



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

SECURITY AND CONTINUITY OF OPERATIONS

October 30, 2013

In reply refer to: NN-1

Dan Seligman
Columbia Research Corporation
PO Box 99249
Seattle, WA 98139

FOIA #BPA-2013-01448-F

Dear Mr. Seligman:

This is a partial response to your request for records that you made to the Bonneville Power Administration (BPA), under the Freedom of Information Act, 5 U.S.C. 552.

You requested the following:

“All other audits and investigation reports since October 1, 2009 related to the operation of BPA’s Human Capital Management office. The term "audit" includes internal audits conducted by BPA staff...and BPA contractors (e.g., AVUE Technologies).”

Response

BPA is releasing the enclosed audit reports with some information redacted under Exemption 6 of the FOIA.

BPA asserts this exemption for information which could reasonably be expected to constitute an unwarranted invasion of personal privacy if disclosed. The withheld information consists of names, and in some cases, the positions of individuals if the position could identify the individual. There is no public interest in the disclosure of this information because it does not shed any light on how BPA has performed its statutory duties.

We have located one other responsive document that will require review. It will be released as soon as that review is complete.

Please contact Kim Winn, FOIA Specialist, at 503-230-5273 with any questions about this letter.

Sincerely,

/s/Christina J. Munro

Christina J. Munro

Freedom of Information/Privacy Act Officer

Enclosures



INTERNAL AUDIT REPORT

**Close-out Review of the Human Capital Management
Enterprise Process Improvement Program Project**

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: May 23, 2011

REPLY TO
ATTN OF: DN-7

SUBJECT: Close-out Review of the Human Capital Management Enterprise Process Improvement Program Project

TO: Ex 6

Attached is our report on the subject review under the Bonneville Power Administration (BPA) Enterprise Process Improvement Program (EPIP). BPA's Business Operations Board (BOB) has required that Internal Audit review each of the nine EPIP projects approximately a year after the BOB decides that implementation of the future-state design for a project is complete. These close-out reviews are intended to assure the board regarding each project's level of success in:

- Achieving the future state vision.
- Making process improvements and assigning responsibility for continuous improvement.
- Implementing key metrics and meeting targets in the year after project completion.
- Realizing expected cost savings through FY 2008.
- Assigning approved residual work to managers responsible for implementation.

Our review of the Human Capital Management (HCM) EPIP project showed that HCM is well on its way to achieving the EPIP vision of a business focused, lean, and operationally excellent organization. However, HCM's success in achieving the full scope of the EPIP vision cannot be assessed until several key IT developments are completed in FY 2011-12 and a few other EPIP sub-projects are completed or enhanced. Also, we found that HCM needs to validate the status of all EPIP sub-projects, better document ownership of some improvements going forward, and continue developing or improving key metrics used to monitor several process improvements. Finally, we found that the HCM EPIP met its cost savings target set for FY 2008, and that HCM has assigned clear responsibility for completing residual work (key IT developments). We are making eight recommendations to help assure success of remaining EPIP initiatives and related continuous improvement in HCM processes.

HCM management reviewed and commented on our draft report and we have considered their inputs in presenting our findings. HCM concurred with our recommendations, but noted that one recommendation involves an EPIP sub-project to be completed by Business Process and Continuous Improvement (NB). Tracking of final management decisions and actions on recommendations is required to support BPA internal control assurance. HCM and NB decisions and related action plans should be coordinated through the Internal Control Oversight Team's representative for Internal Business Services within 60 days of this report.

We greatly appreciate the assistance and cooperation of HCM staff during this review. If you have any questions about this report, please contact Ex 6 or

Ex 6

Ex 6

Attachment

cc:

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Ex 6

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Ex 6 :dh:3/23/11 (Memo - EPIPclose-HCM-5-23-11.doc)

BACKGROUND

INTRODUCTION

In 2003, the Bonneville Power Administration (BPA) created an initiative intended to help achieve one of the agency's key strategic objectives: effective cost management through agency systems and processes. The initiative is the Enterprise Process Improvement Program (EPIP).

EPIP OVERVIEW

The EPIP's goal is to help BPA become more efficient and more effective by reducing costs and delivering higher value to the BPA region and to agency employees. Beginning in 2005, BPA analyzed and recommended hundreds of specific improvements in the processes comprising nine agency functions that have the greatest potential for cultural and financial impacts:

- Energy Efficiency
- Public Affairs
- Transmission Operations and Maintenance
- Marketing and Sales
- Transmission Plan, Design, Build
- Asset Management
- Human Resources and Staff Management
- Information Technology
- Supply Chain

A separate EPIP project was established in each of these nine areas to identify improvement opportunities and a future-state design, develop improvement recommendations and initiatives to achieve the future state, and execute the multi-year improvement plan.

The BPA Business Operations Board (BOB) oversees the EPIP and monitors each EPIP project until its completion. To help assure the BOB regarding overall project success, the board requires that BPA Internal Audit review each project about a year after project close-out. Project close-out occurs when the project manager, BPA's project management office, and the executive sponsor have certified and approved that implementation of the future-state design is complete. This report covers Internal Audit's close-out review of the Human Resources and Staff Management EPIP project, which later became known as the Human Capital Management (HCM) EPIP project.

HCM EPIP PROJECT OVERVIEW

The HCM EPIP project was initiated in November of 2004 to address operational efficiencies and make recommendations for change. From detailed analysis of 8 processes and 6 functional areas in HCM, the HCM EPIP report identified over

70 recommendations for improvements. The direction and recommendations of the study were adopted by the BOB on June 14, 2005, and implementation planning began in July 2005. Following the approval of the study, the HCM EPIP Implementation Team consolidated over 70 recommendations into 27 specific sub-projects targeting efficiency gains and other improvements across HCM functions (see Appendix 1). We performed a cross-walk of the original HCM EPIP recommendations to the sub-projects as shown in Appendix 2 and noted that HCM had expanded the efficiency improvement efforts to areas that were not on the original report. These areas include Leadership Succession Planning (R6008), People and Culture Perspective (R6009) and Manager Training Evaluation (R6024).

OBJECTIVES AND SCOPE

Based on the EPIP Project Closure Process (PCP)¹ requirements and input from EPIP program officials and BPA's Chief Operating Officer (COO), Internal Audit close-out reviews of EPIP sub-projects are designed to determine each project's level of success in the five areas below:

1. The vision for the future state presented in the final EPIP report approved by the BOB has been achieved and is sustainable.
2. Recommended process improvements have been implemented and transferred to permanent owners(s) who will have responsibility for monitoring and continuous improvement.
3. Metrics listed in the certificate of completion and final quarterly report (a) have been developed (related targets set, monitoring procedures established and being used as tools to manage the business); and (b) were achieved in the first full fiscal year following project completion.
4. Cost savings expected were achieved as of the final tracking report for 4th quarter fiscal year 2008.
5. Residual work approved at closing has been cataloged and appropriately handed off to a manager responsible for continued implementation efforts.

The HCM EPIP team officially closed the EPIP project on September 29, 2009, about a year after BPA implemented the PCP. In addition, beginning in August 2009, the COO requested that EPIP project close-outs identify the key process improvement recommendations whose implementation would confirm that the intent of the EPIP project was achieved. The key improvements are an initial focus for Internal Audit and

¹ The EPIP Project Closure Process, dated June 16, 2008, is guidance which establishes: (1) criteria to determine a project's readiness for closing; (2) procedures for approving project closing; (3) a repository of records necessary for audit follow-up; (4) a clear transition for continuous improvement; (5) the chain of ownership for process improvements; and (6) the chain of ownership for any residual work. The guidance provides a specific list of documents that need to be available in an "audit folder" for any future follow-up reviews.

can help limit the scope of review on larger EPIP projects. Of the 27 HCM EPIP sub-projects, we reviewed 13, including 10 selected by the Chief Human Capital Officer (CHCO) as key in showing EPIP value achievement, and 3 of our selection.² CHCO selections, made in October 2009, included both “priority” and “residual” sub-projects, with one phase of R6027 Service Connection listed in each category (see Appendix 3).

Where the EPIP project’s records repository required by the PCP was adequate, we used those records for our review. To test whether EPIP sub-projects are in place and functioning as intended, we interviewed HCM and other employees and examined various documents including the Quarterly Progress Reports dated September 29, 2008, and January 27, 2009. To evaluate the effectiveness of the sub-projects, we verified that HCM’s metrics were achieved for the EPIP sub-projects reviewed.

FINDINGS

SUMMARY

At roughly 18 months after EPIP project closure, we found that HCM’s level of success in achieving the objectives that comprise the EPIP vision is mixed but clearly increasing as time passes. HCM appears to be well on its way to achieving the business focus objective and has made significant strides in pursuing the EPIP’s operational excellence objective and its vision of a lean organization. However, several IT projects integral to the vision of a highly automated and efficient HCM operation will not be completed until the end of FY 2011 or well into FY 2012. In addition to the IT-focused residual work, HCM needs to address a few other process improvements that are either not complete or need work to be adequately efficient and effective.

Concerning specific process improvements, 8 of the 13 sub-projects reviewed are fully or substantially complete, although a key one, Hiring, is being redesigned, and two others are needing decisions on attaining an effective level of automation. Among the five sub-projects either partly complete or not yet started, related decisions and actions are needed on staffing, funding, and obtaining necessary user inputs to reach completion. Overall, for effective accountability and ownership, documentation is needed on the status of all 27 sub-projects and on the formal assignment of the EPIP recommended improvements to owners.

Since EPIP project closeout, HCM has been actively developing metrics to track EPIP related improvements. For our detailed review, we shifted scope to focus on those metrics actually developed and used in FY 2010. This involved metrics for five of the eight fully/substantially complete sub-projects. While HCM met FY 2010 targets for 75 percent of these metrics, it needs to improve effectiveness or timeliness for a few of them. Meanwhile, work to develop and use metrics to monitor process improvements needs to extend to all EPIP sub-projects that have been or will be completed.

² We initially selected four sub-projects to add to those selected by the CHCO. However, we found that one we selected, R6024 - Manager Training Evaluation, was reclassified and finished outside the EPIP environment. As a result we did not finish evaluating R6024.

Focusing on FY 2008, when tracking of savings ended for the EPIP projects, we found that the HCM EPIP achieved the savings expectations set for the project at that time. Also, the HCM organization achieved related FTE reductions of 34 percent through FY 2008.

Finally, we found that HCM has clearly assigned responsibility for the residual work and completion of the IT projects involved is expected in FY 2011-12. These IT developments are still key to realizing many of the benefits intended for the HCM EPIP.

VISION

The overall vision of the HCM EPIP Report was to create a World-class workforce by assuring that the right people with the right skills are in the right positions, at the right time through HR Leadership. The report also defined the following overarching objectives for the HCM organization:

- **Business Focused:** Align HR strategy and resources in support of Agency goals and objectives.
- **Process Centric and Results Oriented:** Develop an organization that continually looks for the most effective and efficient way to provide service and support.
- **Highly Automated:** Enable managers and employees to easily secure HR information and make business and personal decisions quickly and more independently through the use of automated business systems.
- **Operationally Excellent:** Create a lean and effective, organization that enables its employees to operate as a team.
- **Achieve a 40 percent cost reduction by September 30, 2008.³**

At roughly 18 months after EPIP project closure, we found that HCM's level of success in achieving the objectives that comprise the EPIP vision is mixed but clearly increasing as time passes. HCM appears to be well on its way to achieving the business focus objective. It provides strategic advice through its Business Partners, affords one point of contact for each hiring manager, and has developed a BPA Talent Management Strategy (TMS) and a workforce plan. We observed that the HCM employees have a clear understanding and appreciation of the strategic nature of their work and the need for being proactive in identifying areas and projects which would likely need employees with new skills. Many employees across the six HCM groups and hierarchy seem to understand the TMS and were able to articulate the connection between their work and the strategies identified by the TMS.

³ A revised cost reduction goal of 36.5 percent was subsequently approved at the BOB meeting on September 5, 2006. Later EPIP quarterly reports show a revised 25 percent baseline cost reductions target for FY 2008. Overall, with additions and scope changes, the HCM EPIP was expected to reduce costs by 17.2 percent by the end of FY 2008.

Also, HCM has made significant strides in pursuing the EPIP's operational excellence objective and its vision of a lean organization. This is evident in FTE reduction of 33 percent (BFTE down from 113 in FY 2004 to 76 in FY 2010) and resulting cost savings of nearly 20 percent through FY 2008. HCM achieved its FTE reduction and cost savings primarily by consolidating staff resources in the HCM organization and enabling greater agency reliance on self-service processes such as web based training registration and the use of HR Help for routine assistance questions.

HCM's notable success in achieving more business focused and leaner processes has not yet been equaled regarding the automation and efficient service delivery objectives. The several IT projects discussed in the Residual Work section later in this report are integral to the vision of a highly automated and efficient HCM operation, but will not be completed until the end of FY 2011 or well into FY 2012. Although the first phase of Service Connection (Phase I) implemented in June 2010 has created some efficiencies by linking HCM to other functions such as Space management, Desktop operations and Security offices, the tool continues to have several limitations requiring manual processes.

As discussed in the next section of this report, in addition to the IT-focused residual work, HCM needs to address a few other process improvements that are either not complete or need work to be adequately efficient and effective. Until both the residual work and these other projects are complete we cannot determine how successful the HCM EPIP has been in achieving and sustaining its vision.

PROCESS IMPROVEMENTS

The table below summarizes our evaluation of the 13 in-scope sub-projects. We found that 8 of 13 can be considered fully or substantially complete, although 2 of these employed a different solution than planned. We found that implementation of three of the fully/substantially complete sub-projects appears effective, but that five have questionable effectiveness or known inefficiencies. Of the remaining five in-scope sub-projects, we found three partially complete, one cancelled, and one not yet started. On ownership for 12 sub-projects (excluding the cancelled project), we found no transfers to permanent owners documented as the PCP prescribes, but did find either owner name (7) or organization (5) for all of them. However, while retirements or transfers have changed ownership of two sub-projects, no changes were reflected in any formal handoff documents. Also, knowledge in HCM of the recommended EPIP improvements behind the sub-projects is limited.

HCM EPIP Projects	Selected by	Audit evaluation of project improvement		
		Completed	Effective	Transfer to owner documented
1. R6001-Service Delivery Model	CHCO-Priority to assure value	Full	Yes	Name at closure but not updated
2. R6003-FTE Forecasting & Reporting	Internal Audit	Full	No (too manual)	Position at closure
3. R6007-Workforce Planning	Internal Audit	Full	Yes	Name at closure and updated
4. R6010-Position Management	Internal Audit	None (cancelled)		
5. R6011-PD/Crediting Plan	CHCO-Priority to assure value	Partial		Position at closure
6. R6012-Recruiting	CHCO-Priority to assure value	Substantial (no media strategy)	In question	Name at closure and updated
7. R6014-HR Recruit Requisition	CHCO-Residual IT development	Full	Yes	Position at closure
8. R6015-On-Line Application	CHCO-Priority and Residual	None		Position at closure
9. R6016-Hiring	CHCO-Priority to assure value	Substantial (redesigning)	No (too inefficient)	Position at closure
10. R6018-Performance Management	CHCO-Residual IT development	Partial		Name at closure and updated
11. R6021-Automated Leave Request	CHCO-Residual IT development	Full (alternate solution)	In question	Name at closure and updated
12. R6026-Personnel Action PIP	CHCO-Residual IT development	Full (alternate solution)	In question	Name at closure and updated
13. R6027-Service Connection (Phase I, II)	CHCO-Priority and Residual	Partial		Name at closure but not updated

Eight sub-projects fully or substantially complete

R6001, R6003, R6007 and R6014 can be considered fully implemented. Their completion is evidenced in the re-structuring of the HCM organization, the streamlining of the FTE forecasting process, the implementation of workforce planning, and the implementation of the recruit requisition component of Phase I of Service Connection in June 2010. However, we noted that the FTE forecasting process (R6003) continues to be somewhat of a manual process.

While sub-projects R6021 and R6026 can also be considered fully complete, each utilized a different solution than originally planned. Sub-project R6021 (Automated Leave Request) has been implemented as a Sharepoint tool while originally intended to be part of the Peoplesoft Optimization project. Meanwhile, R6026 (Personnel Actions) has been implemented through both HR Help (change in work schedule, change in hours, name change, etc.) and Service Connection (end of detail, temporary promotion, etc.). The original intent was to have all routine actions be implemented as part of Service Connection.

Recommendation 1: Human Capital Management should determine how automation benefits intended for EPIP sub-projects R6021 and R6026 can best be achieved and document the decision and schedule for required process changes (i.e., consolidation in HRMIS or Sharepoint, or alternative changes).

Of the two substantially complete sub-projects, R6012 (Recruiting) has been mostly implemented with development of an effective student and apprentice recruiting program in Transmission Services and Finance. HCM is yet to follow suit with recruiting development in other BPA organizations. In addition, media strategy for internet recruiting has not been developed and the project failed to meet two of its targets related to female hiring in FY 2010. The project owner also mentioned that there is a need for better monitoring the effectiveness of various recruiting initiatives. Currently the newly hired Talent Acquisition Manager is looking to improve this process further. In addition, diversity has eight cross agency targets for FY 2012 indicating the importance of this sub-project.

Sub-project R6016 (Hiring) is substantially complete but a Hiring Implementation Team (HIT) is now re-designing the process to meet a new Presidential directive (May 2010) and to reduce inefficiencies. While several of the future state recommendations are complete (having a documented and repeatable process, achieving a “single point of HR contact” for hiring managers, etc.), HCM personnel assert that the sub-process is not efficient. The HIT team is trying to identify bottlenecks and come up with solutions.

Five sub-projects are either partially complete or not implemented

Sub-project R6011 (PD/Crediting) is partially complete, with PDs/crediting plans developed for engineering and IT positions. Implementation for other positions is on hold due to delayed appointment of a permanent manager for the Talent Acquisition group and lack of personnel with subject matter expertise.

Sub-project R6018 (Performance Management) is partially complete with the initiative, “Performance Management Process Facilitates Career Development Planning between Supervisor and Employee,” not implemented. Also, an “e-performance” tool expected by SOY FY 2011 was delayed when not ranked high enough for timely funding by the Agency Priority Steering Committee (APSC).

Recommendation 2: Human Capital Management should determine and document a revised schedule to obtain approved funding and complete work on the e-performance component of EPIP sub-project R6018.

At completion of our review HCM notified us that responsibility for sub-project R6027 (Service Connection) has been shifted to the Business Process and Continuous Improvement group (NB). Currently the project is partially complete with implementation of Phase I (when three services -- Acquiring Talent, Contractor

Onboarding, and Personnel Moves -- were implemented). Phase II implementation has been scaled down from the original 29 services to stabilizing the three services in production, evaluating Bonneville Administrative Request System (BARS) services for potential automation, and developing a decommissioning plan for BARS. Further, the seven BARS services being considered for automation may not necessarily be moved to Service Connection at all. One or two services could be moved to Service Connection in the future if they are deemed to be cost effective.

Interviews of various Phase I users outside of HCM indicate that, while some efficiencies have been achieved, there are still many upgrades necessary to maximize efficiency. Interviewees also uniformly endorsed the need for a user forum and a site for reporting problems with their modules. They also said that managers and contracting officer's technical representatives (COTRs) need additional training to use Service Connection. We found no documentation of such user inputs and training needs.

Recommendation 3: Business Process and Continuous Improvement should obtain input from Service Connection users on EPIP sub-project R6027 needs, including manager and COTR training, and use the inputs in continuous improvement efforts.

Two in-scope sub-projects -- one we selected and one the CHCO noted as both a priority and a residual work item -- have not been implemented. The project closure report indicates that 6010 (Position Management) was formally cancelled and deemed "inherently a manager function with guidance provided by HR professionals." We found no cancellation date nor who approved this action. Meanwhile, as a priority, we expected R6015 (On-Line Application) to be at least partially complete. Yet, it has not started due to factors including delays in Talent Acquisition manager appointment, APSC approval and HRMIS 9.0 implementation. It is funded and the tool has been selected but we were told there could be more delay since the current manager wants to explore additional options not considered earlier.

Recommendation 4: Human Capital Management should review the HCM EPIP's 27 sub-projects to confirm and document those considered fully or substantially complete and those still scheduled for future completion, and to adequately document all decisions made to not implement sub-projects.

Ownership of improvements partially documented

The PCP specifies that, as each recommended improvement is completed, the deliverable is transferred to a permanent owner who has ongoing responsibility for monitoring and continuously improving it. Further, it requires documentation of the transfer, of the individual's acceptance of the responsibility, and of any subsequent hand-offs if this person retires, changes jobs, etc., so that there is an unbroken chain of custody for continuous improvement and metrics monitoring. Finally, the PCP also requires documentation of improvements that will never be implemented.

Except for the cancelled sub-project, we did not find such a clear accountability structure established for any of the 12 remaining in-scope sub-projects. However, seven had assigned owners listed on closure reports and the other five listed an organizational position as responsible for applying metrics and tracking benefit attainment. We also noted that retirements or transfers have changed ownership for two of the seven sub-projects with named owners but the changes were not reflected in any formal handoff documents.

HCM appears to be widely pursuing continuous improvement, with efforts underway for at least six of the fully/substantially implemented EPIP sub-processes. For example, the entire hiring process is now being re-engineered, in part to meet the new presidential initiative and to address identified inefficiencies. Further, a consultant was hired in August 2010 to identify further improvements in training self-registration, which are expected to be implemented in the next several months.

We noted that HCM's operational excellence pursuit and momentum could be further supported by a clear line of sight from EPIP recommended improvements to current efforts. Discussions with HCM managers and other personnel showed that very few of the personnel who were familiar with the EPIP are still with HCM. We also noted that many new personnel and new managers have very little awareness and knowledge of the recommended improvements that led to the current sub-projects. R6002 (HR Portal) provides an example of this line of sight need. While EPIP documents show that it is complete, we observed that HR Portal has not been updated since 2008, and that some HCM managers consider the project to be partially complete while others believe it to be complete with unclear ownership.

Recommendation 5: Human Capital Management should cross walk the EPIP recommendations to the "HCM Roadmap" of current sub-projects and assure that all relevant deliverables have a designated owner with documented accountability for continuous improvement and monitoring as outlined in the Project Closure Process requirements (June 16, 2008).

CLOSING METRICS

It appears HCM is making substantial progress in developing metrics to track all EPIP related process improvements. The Manager of Integrated Strategy & Policy heads a project to identify a full Talent Management monitoring framework, and HCM began reporting to the BOB on some of these metrics in January 2011.

Seven of twelve FY 2009 metrics that HCM reported to evidence achievement of EPIP objectives were not tracked in FY 2010 because HCM did not consider them relevant after EPIP closeout. For this reason we deleted the quarterly reporting metrics from our review scope and focused on those listed in individual sub-project closing documents, as well as those on the certificate of completion. We noted in the preceding section that eight fully or substantially complete sub-projects best demonstrate EPIP results at this point in time. We found that HCM developed 20 metrics to monitor 5 of

these 8 fully/substantially complete sub-projects (with some duplicate metrics between sub-projects). We found that HCM met targets for 16 (75 percent) of those metrics in FY 2010. We also noted that three of the metrics do not provide effective or timely monitoring. Our results are summarized below and are detailed in Appendix 4.

Sub-project	Metrics identified	Used in FY10	Met in FY10
R6001-Service Delivery Model	Clients satisfied with HCM programs and transactions	Satisfaction rate	Yes (metric ineffective)
	Processes reviewed to identify inherent risks that are unacceptable	Audit findings addressed	Yes
	Effective feedback and motivation on employee survey	Employee engagement scores	Yes
	People's work environment on employee survey	Employee engagement scores	Yes
	Professional standards (certification)	% certifications	Yes
	Training plans for HCM	% plans in place	No
	HCMLT and reorganization in place	ADKAR scores, FTE, Budget, BSC	Yes (four)
R6003-FTE Forecasting & Reporting	None		
R6007-Workforce Planning	BPA workforce plans implemented	% plans completed	Yes
	Processes reviewed to identify inherent risks that are unacceptable	Audit findings addressed	Yes
R6012, 14, 16- Recruiting, Hiring	Talent management, including diversity strategy	% minority/women hires (6 metrics)	Yes (four); No (two)
	Diversity hire separation ratio	None, substituted 6 above	
	Processes reviewed to identify inherent risks that are unacceptable	Audit findings addressed	Yes
	Quality of candidates	% quality candidates	Yes (metric not timely)
	Key performer turnover rate	% key performer turnover	Yes
	Hiring satisfaction rate	% satisfaction rate	Yes (metric not timely)
	Time to fill	Days to fill	No
R6021-Automated Leave Request	None		
R6026-Personnel Action/PIP	None		

Seven metrics were identified on the closure documents for sub-project R6001 (Service Delivery Model). We verified that all were developed and tracked for FY 2010. An additional three metrics also were tracked (FTE, costs and HCM goals) for a total of ten. HCM achieved FY 2010 targets for nine of the metrics. However, we do not believe the "Internal Customer Satisfaction" metric was effective since it tracked satisfaction with Internal Business Services rather than specific HCM programs, such as employee relations, conflict management and hiring, to name a few. HCM needs to develop more effective customer satisfaction metrics for its programs using means such as more

specific surveys, focus groups, etc. If HCM requires, Internal Audit can assist in employing suitable techniques to support such metrics.

Recommendation 6: Human Capital Management should identify and implement techniques to effectively measure internal customers' satisfaction with specific HCM programs.

Two metrics were identified for sub-project R6007 (Workforce Planning). HCM met FY 2010 targets for both metrics.

From a set of eight metrics identified on closure statements for sub-projects R6012, R6014, and R6016, HCM tracked results related to six of these in FY 2010. Not tracked were the diversity hire/separation ratio and the reduction in total staff hours metric. HCM decided the diversity metric was too confusing and chose to use six other metrics related to diversity. The staff hours metric could not be readily calculated since automation efforts are not complete, and HCM decided it was not practical to calculate it manually. In total, with use of the multiple diversity metrics, eleven metrics were tracked for R6012, R6014, and R6016, as shown in the table above. HCM met eight of the FY 2010 targets set for these metrics. However, we noted that two metrics, the Hire Satisfaction Rate and the Quality of Candidates, were measured by an Office of Personnel Management (OPM) survey and the data was not available to BPA in time for effective use in managing the business. HCM needs more timely metrics for monitoring the related improvements, and Internal Audit can assist if HCM requires help to develop them.

Recommendation 7: Human Capital Management should identify methods to obtain timely inputs on quality of candidates and hiring satisfaction for use in monitoring ongoing effectiveness of related EPIP improvements.

HCM did not develop any reliable metrics for FY 2010 to monitor sub-projects R6003, R6021, and R6026. Although inputs related to R6026 were obtained through a quarterly transactional survey that measured satisfaction with HR Help, the survey results were meaningless due to the low number of participants completing their surveys.

Recommendation 8: Human Capital Management should develop a key metric(s) and monitoring procedures for improvements under each HCM EPIP sub-project implemented (as identified in actions under Recommendation 4) whenever feasible, or document why development is infeasible.

COST SAVINGS

Our evaluation of an EPIP project's success regarding cost savings reflects the fact that tracking of savings was phased out for all EPIP projects after FY 2008. So, focusing on savings produced as of FY 2008, we found that the HCM EPIP succeeded in achieving its expected cost savings.

The HCM EPIP 4th quarter tracking report for FY 2008 shows that HCM's operating budget target for that fiscal year was to be at or below \$17.4 million. This amount includes assumptions regarding inflation rates and exclusions and inclusions due to scope changes. HCM met the target when its actual FY 2008 expenditures came in at \$17.0 million. This is a 19.8 percent reduction compared to the \$21.2 million level projected for HCM operating costs in FY 2008 without any EPIP driven savings.

RESIDUAL PROJECTS

The Project Closure Process specifies that remaining EPIP deliverables (residual work) be catalogued and appropriately handed off to the manager responsible for their continued implementation. Also, the hand-off must be explicit so the recipient knows that he/she is now accountable for successful completion of the work. The CHCO and the certified closing documents identified the following residual work around several IT projects that will be implemented through the leadership of the HCM Manager of Internal Operations along with various process owners:

- Service Connection
- HRMIS 9.0 optimization to include ePerformance, On-Line Application, Leave and Absence management, Personnel actions, and Health and Safety.
- Call Center Technology for HR Help
- Electronic personnel folder
- User Productivity Kit for Peoplesoft 9

The current manager of HCM Internal Operations appears to be fully accountable for coordinating implementation of all of the above except the Service Connection project. The Supervisor of Business Process and Continuous Improvement is now responsible for implementing Phase II of the Service Connection project, and is reporting directly to the Executive Vice President for Internal Business Services.

As of our review, many of these IT projects are not fully operational. Their status is summarized below:

- Service Connection: Phase I was implemented in June 2010 which included the implementation of three services, Acquiring Talent, Contractor

Onboarding, and Personnel Moves. Phase II implementation has been scaled down from the original 29 services to stabilizing the three services in production, evaluating BARS services for potential automation and developing a decommissioning plan for BARS. Phase II is expected to be completed by March 31, 2011.

- HRMIS 9.0 optimization: The ePerformance tool has not been implemented due to lack of APSC approval. The Online Application tool project has been delayed due to several factors, including lack of funding, changes in HCM Talent and Acquisition managers, non-availability of subject matter experts, and lack of IT resources. Leave and Absence management has been fully implemented as a Sharepoint application, while Personnel actions have been implemented as part of HR Help and Service Connection. Minimal work has been performed on the Health and Safety technology initiative.
- HR Help Call Center: Minimal work has been performed on this project, but HCM is focused on completing either this or the Health and Safety technology initiative discussed above, by the end of FY 2011.
- Electronic personnel folder: Project work has begun and HCM expects it to be operational within HCM by FY 2011 and across BPA by FY 2012.
- User Productivity Kit: Work on this project has been progressing and is expected to be completed by Q3 of FY 2011.

Appendix 1

Consolidation of 70+ HCM EPIP Recommendations into 27 Sub-Projects

(In-Scope Projects are in bold)

HCM EPIP Sub-Projects	Description
R6001	Service Delivery Model
R6002	HR Portal
R6003	FTE Forecasting and Reporting
R6004	Reporting
R6005	HR Strategy
R6006	Policy Consolidation
R6007	Workforce Planning
R6008	Leadership Succession System
R6009	People & Culture Perspective of Agency's Balanced Scorecard
R6010	Position Management
R6011	PD Crediting Plan
R6012	Recruiting
R6013	Student Recruiting
R6014	HR Recruit Requisition
R6015	On-Line Application
R6016	Hiring
R6017	Diversity PIP
R6018	Performance Management
R6019	Recognition Strategy.
R6020	Recognition Automation Agency
R6021	Automated Leave Request
R6022	Training Determination and Delivery
R6023	Training Self Registration
R6024	Manager Training Evaluation
R6025	Conflict Management
R6026	Personnel Action PIP
R6027	Service Connection (Phase I and II)

Appendix 2

Sub-Projects Linked to HCM EPIP Report Recommendations

Sub-project(s) matched to HCM EPIP report recommendations	HCM EPIP report recommendations (page nos.)	Number of recommendations from the KEMA report combined	HCM EPIP recommendation (consolidated)
R6001, 6002, 6003, 6004, 6027	Administrative Transactions (8, 27, 81, 88)	14	Consolidate, centralize, standardize & eliminate duplication; eliminate unnecessary processes
R6010, 6011, 6012, 6013, 6014, 6015, 6016	Filling Vacancies (39, 41)	5	Automate to the fullest; self-enables; eliminate need for administrative support
R6023	Training Registration (29, 49)	6	Standardize, automate & centralize registration
R6022	Training Determination & Delivery (57)	4	Focus internal training & development on strategic objectives; centralize determination & delivery
R6017	Agency Diversity Process (65)	4	Standardize processes; tie to strategic initiatives
R6005, 6006, 6007	HR Policy & Procedures (70, 72)	3	Consolidate into HR; clarify business unit role
R6025	Conflict Management (76, 93)	6	Compile policies & create 'wizards'; develop training; simplify; streamline
R6027	Reorganizations (81)	6	Form task group of key staff and assess requirements and alternatives
R6001	Staff Management (87)	6	Assign to EBR as Strategic Partners
R6007, 6016	Acquiring & Positioning (91)	4	Develop agency staffing plan; project & prioritize hiring needs; consolidate information

Sub-project(s) matched to HCM EPIP report recommendations	HCM EPIP report recommendations (page nos.)	Number of recommendations from the KEMA report combined	HCM EPIP recommendation (consolidated)
R6022	Learning Environment (93)	1	Assess future training & development needs
R6017	HR, Diversity & EEO (98)	3	Reposition functions; update website; evaluate Pluralism Council
R6018, 6019, 6020	Maintaining a supportive and effective Work Environment (99)	3	Consulting coordination; align employee services; develop performance management and recognition strategy
	Employee Services (102)	2	Participate in federal automation initiatives; on-line annuity estimator; OPM retirement modernization
R6001, 6015, 6021, 6026, 6027	Human Resources (103)	4	Process centralization and standardization; automation
R6001	HR & Staff Management Organizations – consolidated recommendations	Theme of the EPIP	Consolidate HR & streamline in single organization; consolidation & centralization of administrative transactions; combine & assign to EBR

Total recommendations covered by sub-projects = 71.

Total recommendations listed on HCM EPIP Report = 71.

R6008 (Leadership Succession Planning), R6009 (People and Culture Perspective) and R6024 (Management Training Evaluation) were not part of the original EPIP recommendations.

List of Key Projects Identified by CHCO

Appendix 3

Below are proposed metrics for Internal Audit's use in reviewing the implementation of the HCM EPIP.

1. Pursuit of new HCM Service Delivery Model

HCM has reorganized and has revised all of the positions reporting to the CHCO. With recruitment of additional new talent, HCM will have the strongest mix of internal talent combined with individuals who have been living best practices in other organizations and industries. Goals for implementing the Service Delivery model include:

EPIP Sub -project	Outcomes	Metric
R6001 Service Delivery Model	<ul style="list-style-type: none"> • New management team and successfully passed probationary period • Up-skilling of current /new staff with leadership skills and expertise needed to accomplish the new role as a strategic partner to the Agency by EOY09. • Implementation of performance consultant positions • Implementation of matrix teams around BU lines. 	<ul style="list-style-type: none"> • Internal customer satisfaction rate of 3.5> • 25% of 201 series position to have professional certification • Training and/or developments plans in place for 85% of HCM • ADKAR scores appropriate for the stage of change • FTE 84 for FY10; and 77 for FY11 • Budget between 97.5-103% • HCM Balanced Scorecard

2. Integration of all EPIP implementation related to Hire Process

HCM will conduct process audits on key EPIP processes. The audits will address process ownership, process standards, employee execution, employee skill gaps, and review of process metrics. The process audits will compare the process against requirements, verify the process against predetermined instructions and standards, measure conformance and examine resource demands.

EPIP Sub -project	Outcomes	Metric
R6011 PD/Crediting R6012 Recruiting R6015 On-Line Application R6016 Hiring R6027 Service Connection	<ul style="list-style-type: none"> • End to end tracking system in place (Service Connection) • Reduction in FTE involved in processing applications 	<ul style="list-style-type: none"> • Quality of candidate >85% • Hiring satisfaction rate >85% • Time to fill < 82.25 days • Key performance turnover (6% turnover in critical occupations) • Reduction in total staff hours (#apps x hours x \$ for FY09)/(#apps x hours x \$ for FY10)

3. Residual Automation Projects and Optimization of PeopleSoft 9.0

With the recent approval of the APSC in August of 2009, the HCM Manager of Internal Operations will oversee the completion of these IT dependent EPIP projects.

EPIP Sub -project	Outcomes	Metric
R6014 Recruit Request R6015 On-Line Application R6018 Performance Management * R6021 Automated Leave Request R6026 Personnel Action ** R6027 Service Connection (BARS)	<ul style="list-style-type: none"> • Service Connect – Implementation by 12/09 for Release 1.0. • HRmis 9.0 Optimization to include ePerformance and Recognition, Health and Safety, On-Line Application, Leave and Absence Management, and Personnel Actions. • Electronic Official Personal Files (EOPF) • User Productivity Kit for PeopleSoft 9.0. 	<ul style="list-style-type: none"> • Efficiency gains in IT, Workplace Services , Security and HCM of approximately 300 hr/work week • Automated systems are embedded in associated business process

Audits will consider requirements of the EPIP Project Closure Process, dated June 16, 2008. All HCM documentation is located at \\HFILE\EPIP\Team Folders\Human Capital Management Team. Project notebooks are located at V6 on first floor of HQ.

* Erroneously listed as R6017 in the original document.

** Erroneously listed as R6016 in the original document.

Appendix 4**HCM Metrics Analysis**

Process	Description	Metrics identified on project closure documents	Metrics tracked by HCM during FY 2010	Comments
R6001	Service Delivery Model	Measure Internal Satisfaction with HCM. Clients are satisfied with HCM programs and transactions.	Internal customer satisfaction rate of 3.5>	Yes, but the measure is a generic IBS survey that does not target specific programs such as Library, ER.
		HCM business processes are reviewed to identify those with inherent risks that are considered unacceptable.	Audit findings from FY 09 Occupational Health and Reasonable accommodation program audits completed by EOY 2010 and risk-assessment completed training self-registration process.	Yes, audit findings from FY 09 audit were addressed in FY 2010; training self-registration process is being re-engineered based on an analysis of the process.
		Effective feedback and motivation on employee survey.	Employee Engagement Scores on Gallup Q 12 \geq 3.76	Yes, 3.78.
		People's work environment on employee survey.	Same as above	Same as above.
		Professional standards (certification)	25% of 201 series position to have professional certification	Yes.
		Training plans for HCM	Training and/or developments plans in place for 85% of HCM	Not met for FY 2010.

		HCMLT and Reorganization in place	ADKAR scores appropriate for the stage of change	Yes.
			FTE 84 for FY10; and 77 for FY11	Yes met for FY 10 and not met for FY11- estimated to be 80.
			Budget between 97.5%-103%	Yes.
			HCM Balanced Scorecard	Yes.
R6003	FTE Forecasting and Reports	Not Identified.	Not Identified.	
R6007	Workforce Planning	Agency Level workforce plans are implemented.	At least 80% of FY 2010 Workforce action plans are completed effectively.	Yes.
		HCM business processes are reviewed to identify those with inherent risks that are considered unacceptable.	Audit findings from FY 09 Occupational Health and Reasonable accommodation program audits completed by EOY 2010 and risk-assessment completed training self-registration process.	Yes, audit findings from FY 09 audit were addressed in FY 2010; training self-registration process is being re-engineered based on an analysis of the process.
R6012, R6014, R6016	Recruiting, Hiring	Talent management including diversity strategy.	Student Hires Minority $\geq 10.20\%$; Student Hires Women $\geq 41.30\%$; Apprentice Hires Minority $\geq 10.5\%$; Apprentice Hires Women $\geq 4.8\%$; New Hires Minority $\geq 14.90\%$; New Hires Women	All metrics but two met: Apprentice Minority Hires was 5% (target 10.5%) and New Hires Women was 29.76% (target 34.4%).

			$\geq 34.40\%$	
		Diversity hire separation ratio	N/A	Was not tracked due to the metric being replaced by the above six diversity related targets. This metric was considered to be confusing and HCM discontinued tracking of this metric.
		HCM business processes are reviewed to identify those with inherent risks that are considered unacceptable.	Audit findings from FY 09 Occupational Health and Reasonable accommodation program audits completed by EOY 2010 and risk-assessment completed training self-registration process.	Yes, audit findings from FY 09 audit were addressed in FY 2010; training self-registration process is being re-engineered based on an analysis of the process.
		Quality of candidates	Quality of candidate >85%	Yes but tracked by OPM survey; not an effective metric as results were not available timely.
		Key performer turnover rate	Key performance turnover (6% turnover in critical occupations)	Yes.

		Hiring satisfaction rate	Hiring satisfaction rate >85%	Quality of candidate and Hiring satisfaction rate have been tracked by OPM survey and BPA met these metrics. However, the data did not come to HCM timely to be useful.
		Time to fill	Time to fill < 82.25 days	No- came in at 148 days.
			Reduction in total staff hours (#apps x hours x \$ for FY09)/(#apps x hours x \$ for FY10	Could not be calculated as all automation efforts are not implemented yet.
R6021	Automated Leave Request	Not Identified	Not Identified	
R6026	Personnel Actions	Not Identified	Not Identified	

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Summary of Internal Audit Verification of Completed Actions			Date: 3/22/13
Audit/Review Verified			
Title:	DOE Human Capital Accountability Program – FY 2010 Audit (BART Follow-up)	No. and Date	32124/72
Owner (Org.):	Ex 6	Internal Control Oversight Team Representative:	Ex 6
Internal Audit Verification Results			
<p><u>Audit/Review Recommendation No. 1:</u> The overall assessment of BPA’s Human Capital organization revealed that the organization would benefit from obtaining training in the staffing and classification areas.</p> <p><u>Management Decision on Follow-through:</u> BPA has put in place training for on boarding and developing Recruiting and Staffing advisors (RSA's) Training includes Internal training, Online, Job shadowing, Classroom (example, specific training to category rating and veterans preference), Training specific to audit findings, Training supplied by AVUE, Classroom – Foundational and System Training - See Workshops listed below scheduled for Sept/Oct 2012, Online tutorials, Individual one on one training, Team Development internal and externally by Teams and Leaders Strategy and visioning sessions: Values, Norms and guiding Principles, Team dynamics, OPM training, OPM DEU Certification Basic Staffing and Placement</p> <p>WORKSHOP 1 Classification/Position Management in ADS Basics</p> <ol style="list-style-type: none"> Understanding the relationship between position classification and recruitment and placement, in particular series and specialization determinations. Understanding the flow from position management to recruitment and staffing in Agree. Creating positions in AVUE and validating the recruitment criteria against position structure, duty assignments, grade determinations, organizational alignment, and position management principles. Creating effective recruiting strategies by examining classification options and alternatives. Documenting changes to positions and validating changes are reflected in staffing criteria in AVUE. Using AVUE for desk auditing. Understanding how AVUE determines and document FLSA exemption determinations. Understanding veteran’s preference and veteran hiring initiatives. Review of the Merit System. <p>WORKSHOP 2 Collaborating with Management</p> <ol style="list-style-type: none"> Working with management in defining work correctly, validating the work performed is described accurately, and advising management on various strategies to marry organizational needs with classification policies and principles. Advising management on the distinctions between classification, compensation, and performance management matters. Advising management on position management and organizational optimization matters. <p><u>Action Owner(s), Organization:</u> Ex 6</p> <p><u>Information That Confirms Action Taken and Completion Date:</u> Obtained and reviewed evidence of training in the staffing and classification areas: Outlook meetings, agendas, table of contents, and other training materials from various trainings - OPM, AVUE, DEU, Workshop 1,</p>			

BPA Audit and Review Tracking (BART) System

Workshop 2, etc. Completion Date: September 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and the management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 2: The HCMAP team strongly advises BPA to eliminate the use of the personnel assessment tool, Staffing Pilot. While the use of this assessment tool is not prohibited, it does appear to be contradictory to the Hiring Reform as outlined in President Obama's Memorandum on Improving the Federal Recruitment and Hiring Process dated May 11, 2010.

Management Decision on Follow-through: BPA is no longer using the Staffing Pilot process.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: NHQ provided a report showing the vacancy announcements using the staffing pilot tool prior to the date of testing. The DOE audit report was issued in June 2011. One instance of a modified staffing process was noted subsequent to that date. Per discussion with Ex 6 and Ex 6, the modified process was not contradictory to the Hiring Reform and should not be considered an exception in this testing. No additional instances were noted subsequent to the DOE audit report. It appears that the recommendation has been implemented. Completion Date: February 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 3: Implement the use of E-OPF: Based on the E-Gov initiative, government wide, the use of E-OPF is a departmental mandate and all Servicing Human Resource Offices are expected to comply. Per Congressional Mandate of all agencies under Title V.

Management Decision on Follow-through: BPA is in the process of finalizing electronic eOPF with implementation complete FY12. Efforts have included a review of existing OPF for all employees and analysis of required documentation, categorization, upload and review of content. eOPF is BPA's standard for compliance with Departmental and Federal mandates

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: eOPF was implemented June 19, 2012. Ten vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Obtained eOPF notices which evidenced the system as operational. In addition, testing of other recommendations includes documents from eOPF which further evidences the implementation of the system. Completion Date: FY12.

Internal Audit Evaluation of Action Taken vs. Management Decision: Action taken and management decision appear consistent. The recommendation appears implemented.

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Audit/Review Recommendation No. 4: Orientation and EOD forms: During the review, the team noted several missing documents and incomplete forms associated with the orientation process. In particular, the OF-306 should be completed in its entirety, meaning, upon appointment, all employees should sign as the “appointee” and not the “applicant”.

Management Decision on Follow-through: Instances of missing documentation and incomplete orientation forms identified during the HCMAP audit have been corrected.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Ten eOPF files were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Four orientation forms should be included with additional forms as needed. The required forms include: 1) SF-61, 2) OF-306, 3) I-9 and 4) SF-144. All four required forms were included in the sample eOPF files, and all OF-306 documents were signed with no exceptions identified. Completion date: September 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 5: Annual Self Audits for DE: Begin to conduct the Annual Self Audits as instructed by the Delegated Examining Operations Handbook, Chapter 7, section D.

Management Decision on Follow-through: BPA schedules a quarterly audit on its Delegated Examining Unit and will incorporate an annual audit schedule beginning FY12 for review of targeted FY11 DEU selections. BPA's audit procedures will adhere to the Delegated Examining Operations Handbook (DEOH) including Chapter 7, Section D.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Quarterly self audit spreadsheets for FY11 Q3, FY12 Q3, and FY 13 Q1 were obtained. In addition, obtained a copy of the FY11 DOE Quarterly Self Audit Q1 results and a copy of a letter that states Ex 6 has completed Delegated Examining Certification. This is in compliance with the Delegated Examining Operations Handbook, Chapter 6, Section D. Completion Date: February 2013

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 6: Review of certificates for DE: Ensure that all returned Delegated Examining certificates are audited in accordance with the Delegated Examining Operations Handbook (DEOH), Chapter 6, section C.

Management Decision on Follow-through: BPA has initiated a new procedure to ensure

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certificates are audited before the first day of appointment of all selections. The Talent Acquisition (NHQ) group has designed and implemented an adhesive audit checklist form attached to certificates and incorporated into the case file to ensure compliance to audit requirements.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Ten vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Reviewed documentation in files noting that four files were missing audit checklists. Of the files with audit checklists, observed that the audit checklist date was prior to the hiring date of the employee selected. Four exceptions were noted. Completion Date: 12/31/2011

Subsequent to testing, NHQ placed checklists in all files with exceptions to correct them.

Internal Audit Evaluation of Action Taken vs. Management Decision: The recommendation has not been implemented effectively.

Audit/Review Recommendation No. 7: Form BPA F 330 11E: Please seek OMB's approval to use this form in lieu of any official or standard OPM forms.

Management Decision on Follow-through: BPA has reviewed forms and attachments to vacancy announcements posted externally. The correct number of the form in question is Form BPA F 3330 "Applicant Disability, Race/National Origin and Gender Identification" that requests information of candidates during the hiring process and is then separated from the application file once submitted. Until a Talent Acquisition System is implemented to collect online information from applicants relative to this form, BPA will use OPM standard form 181 in lieu of Form 3330.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Ten vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012 (prior to implementing the AVUE system). We looked for forms 181 and forms 3330 in the files. Neither form was located in any of the files. These forms were destroyed after the data was input into the system.

For testing subsequent to the AVUE implementation, we discussed the AVUE process with an internal applicant. Data entry is requested but a specific form is not completed. Screen prints from AVUE were obtained. Neither the BPA form 3330 nor the SF 181 is currently in use. Therefore, with the implementation of AVUE, no forms have been needed. Completion Date: September 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: We were unable to verify that the BPA form 3330 11e was discontinued prior to the AVUE implementation. However, the AVUE implementation has eliminated the use of a form. Therefore, the recommendation and the management action appear consistent and implemented. No remediation is necessary.

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Audit/Review Recommendation No. 8: Certificates: Create certificate of eligibles in accordance with the guidelines indicated in the DEOH, chapter 6. Ensure that the appropriate information is visible on the certificate to include the duty station of the position being filled.

Management Decision on Follow-through: A review of DEOH Chapter 6 and BPA practice demonstrates BPA follows documentation of duty station on the certificate.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Nine vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Reviewed the files to verify that a duty station was included along with the other requirements of chapter 6 of DEOH. No exceptions were noted. Completion Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 9: Job Analysis and Crediting Plans: Begin to include a signed copy of a Job Analysis and Crediting plan in all case examining and merit promotion case files. Refer to appendix C of the DEOH. Develop Job Analysis and crediting plans that have a rational relationship between performance in the position to be filled and the employment practice used. Distinguish Job Analysis and crediting plans by grade level. Discontinue using the same plan and JA for multiple grade levels. Use certification requirements that are not overly restrictive so that competition is fair and open. 5 USC 2301 (b) (1) and 5 CFR 300.103 (a) and 5 CFR 300.103 (b).

Management Decision on Follow-through: BPA has adopted a process and operating procedure to include the Job Analysis and Crediting Plan in each case file per DEOH Appendix C - Records Retention and Disposition Schedule. BPA is currently reviewing existing documentation, guidance and procedures with the assistance of expert classifiers.

It is BPA's current practice to apply in appropriate cases, a multi-grade Crediting Plan that delineates differing criteria for multiple grade levels. When completing Job Analyses, there are instances where the core work requirements are shared among grade levels. However, the degree of complexity or expected competency differs among levels. Position Descriptions are developed and classified at each grade level.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Nine vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. All files in the sample had a job analysis and a crediting plan except one crediting plan was missing. The process and operating procedures have been adopted to include the Job Analysis and Crediting Plan in each case file as required by DEOH appendix C – Records Retention and Disposition Schedule. Completion Date: 12/31/2011

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Subsequent to testing, NHQ placed a crediting plan in the file with the exception to correct the error.

Internal Audit Evaluation of Action Taken vs. Management Decision: Due to one file missing the crediting plan, this recommendation is not considered fully implemented.

Audit/Review Recommendation No. 10: Rating Plans and Criteria: Ensure that all rating factors are measurable. Rate, rank and refer candidates solely on the basis of the relative ability, knowledge and skills of the position, after fair and open competition. Discontinue the practice of including scores for education and awarding applicants extra points for possessing certain level of degrees, a non-merit factor in the rating and ranking process. When recruiting for a position that has a positive education requirement, that requirement should be used solely for conducting the basic qualifications/minimum qualifications for the position. The applicant either has or they do not. 5 U.S.C. 2301 (b) (2) and 5 U.S.C. 2301 (b) (1).

Management Decision on Follow-through: BPA has identified instances of this practice and has corrected subject crediting plans. BPA's standard procedure is to use education requirements solely for minimum qualification screening of applicants.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Nine vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Reviewed crediting plans for scores from education including extra points for certain levels of degrees and to ensure that any education points were for the basic qualifications only. The rating and ranking of candidates appeared to be solely on the basis of the relative ability, knowledge, and skills of the position, after fair and open competition. There was no evidence of including scores for education or extra points for degrees. Positions with an education requirement had education solely for minimum qualification screening of applicants. No exceptions were noted during testing. Completion Date: December 2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 11: Vacancy Announcements: Since BPA uses a manual process to post vacancy announcements, the case examining and merit promotion file should contain a copy of the actual announcement from the OPM website. This is to ensure that all announcements are completely posted on the www.usajobs.gov accordingly. Keeping a record of just the control number is not sufficient in this case.

Management Decision on Follow-through: BPA's standard procedure for posting announcements includes printing a copy of the vacancy announcement from OPM's Website to be included in the case file as part of the manual process currently used. BPA anticipates implementation of an electronic Talent Acquisition System and will ensure through this transition that proof of posting to OPM's website is included in any case file.

Action Owner(s), Organization: Ex 6

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Information That Confirms Action Taken and Completion Date: Evidenced posting vacancy announcements on the OPM website at www.usajobs.gov. Ten vacancy announcements were selected at random for a sample from 1/1/2012 to 12/31/2012. One exception was noted.

With the implementation of AVUE in September 2012, BPA jobs are posted on OPM's website for each job announcement. A current vacancy announcement was randomly selected for testing. Searched at www.usajobs.gov for the same vacancy announcement and located it there. No exception found. Completion Date: September 2012

Subsequent to testing, NHQ placed a copy of the vacancy announcement in the file to correct the exception.

Internal Audit Evaluation of Action Taken vs. Management Decision: One exception was noted with initial testing of the manual process. However, the manual process has now been replaced with an automated process that appears to be working effectively. Therefore, there does not appear to be a need to have any remediation done on this recommendation. This recommendation appears to be implemented with the automated process. The action taken and the management decision appear consistent.

Audit/Review Recommendation No. 12: Vacancy Announcements: Discontinue the practice of using agency specific and or agency unique specialized experience on public notice vacancy announcements. In the event the hiring official requires experience that one can only be obtained at the Department of Energy, then the announcement should be restricted to just DOE employees. Treat employees and applicants fairly and equitably. 5 USC 2301 (b) (2).

Management Decision on Follow-through: BPA will discontinue the use of agency-specific references, acronyms, systems, technologies or other BPA or DOE terms in delegated examining announcements.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Nine vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Reviewed each vacancy announcement to ensure no language was BPA specific or had unique specialized experience (agency specific references, acronyms, systems, technologies, BPA/DOE terms, etc.) that would make the announcement unfair according to 5 USC 2301 (b) (2). No language was found that would deem the announcement unfair to outside competition. No files were for DOE employees only. No exceptions were noted. Completion Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 13: Departmental Protocol: Please note that all personnel matters that involve outside contact with the Office of Personnel Management or any other organization, should come to through the Chief Human Capital Office (HC-1) first. Please discontinue the practice of contacting and submitting official request to the OPM without going

BPA Audit and Review Tracking (BART) System

through Sarah Bonilla, prior to action. This includes request to pass over veterans with designation of 30% disability or higher.

Management Decision on Follow-through: BPA will comply with standard Protocol as requested for any future assistance through OPM.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: BPA communicated to DOE that as of October 2012 all communications would go through DOE, not directly to OPM. Obtained results of a query of communications from the CHCO folder searching for communications directly with OPM. One instance, on December 7th, 2012, was noted where HCM contacted OPM directly. This is an exception. Completion Date: October 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: One exception was found. Therefore, the recommendation does not appear to be implemented effectively.

Audit/Review Recommendation No. 14: Vacancy Announcements: Discontinue the use of agency specific acronyms (an acronym in which only a BPA or DOE employee will recognize).

Management Decision on Follow-through: BPA will discontinue the use of agency-specific references, acronyms, systems, technologies or other BPA or DOE terms in examining announcements.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Nine vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Reviewed the announcements looking for acronyms that were BPA specific. No exceptions were found. Completion Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 15: Processing SF-52's: Discontinue the habit of using the "K12" remark code for Delegated Examining selections. K12 remark code is only applicable for merit promotion or merit selection cases. If BPA wants to annotate the cert number and date on their SF-50's, suggest using a miscellaneous remark code for such statement. Reference the Guide to Processing

Management Decision on Follow-through: This remark has been corrected in all DEU selection cases. BPA has discontinued using K12 remark on DEU selections.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: SF-52's are a rough draft of SF-50's. Ten employee files were selected at random for a sample of new hires from 1/1/2012

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to 12/31/2012. SF-50 forms were reviewed and did not include the "K12" remark code. No exceptions were noted. Completed Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 16: Specialized Experience: When posting multiple graded vacancy announcements, please ensure that there is a meaningful, distinct difference of required experience per grade level. 5 CFR 300.103 and Qualifications Standards (X118).

Management Decision on Follow-through: Every VA is custom to each position. BPA uses templates to initiate construction of the VA and the template has a section for specialized experience at different grade levels. Moving forward, and in consideration of TM #15, BPA will ensure that specialized experience clearly reflects graduation benchmarks associated with each grade level.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Nine vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Reviewed the vacancy announcement looking for a distinction of specialized, required experience between grade levels. In the sample, only four vacancy announcements had more than one grade level. These announcements included a distinction of required experience between the grade levels. The other five announcements were for a single grade level so this recommendation was not applicable for this test. No exceptions were noted. Completion Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 17: Vacancy Announcements: Prepare vacancy announcements consistent with public notice requirements and ensure they include the number of positions to be filled (or a standard statement, e.g. number of positions subject to change), appropriate Equal Employment Opportunity Statement that includes sexual orientation as prescribed in 5 CFR 330.707 and Executive Order 13087, and avoid using language not relative to the competitive process.

Management Decision on Follow-through: BPA has expanded its internal audit capability to include 100% review of DEU appointments and a broader selection of processing and merit promotion actions to identify trends, corrections and proactive systemic remedies and measurement. Further, Talent Acquisition has a HR assistant assigned to quality control of all vacancy announcements for compliance to 5 CFR 330.707.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Nine vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012.

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Reviewed vacancy announcements, searching for the number of positions to be filled, appropriate equal employment opportunity statements and language relative to the competitive process. Reviewed all nine vacancy announcements. No exceptions were noted.

During the manual process, HR was completing a quality control check. The process has been automated with AVUE, now the legal and regulatory guidance including EEO is a default selection for all announcements. This was noted in the AVUE log. No exception noted.

Completion Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 18: Advance In Hires: Discontinue the practice of using superior qualifications appointment for the purpose of setting pay at a rate comparable with the appointee's non-Federal salary. Clearly document why the appointee's qualifications were truly superior to that of others in the field or factors supporting the superior qualifications of the candidate(s). 5 U.S.C. 1104(c) and 5 CFR 531.212.

Management Decision on Follow-through: BPA has already adopted a new internal process to pre-approve incentive packages, including advance-in-hire, for new appointments independent of former salaries. BPA's internal policy group has initiated the analysis and development of a "Competitive Offer" policy that will ensure proper documentation of superior qualifications through clarifying distinctions and requirements for various authorities. This will also be utilized to increase management understanding of the recruitment incentive options and applicability.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Twenty employees were selected out of a total population of 111 recent hires between 1/1/2012 and 12/31/2012 for a random sample. For each employee, a "Request and Justification for Superior Qualifications or Special Needs Pay Setting Authority" document was obtained.

Five exceptions were noted:

- where the justification did not clearly satisfy the recommendation (three exceptions)
- where the document was not properly completed (two exceptions)
 - either by not checking the appropriate box or
 - not having a proper review from management

Per Ex 6, the "Competitive Offer" policy has not been developed. Completion Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The recommendation does not appear to be implemented based on five exceptions found. Also, the Competitive Offer policy was not developed.

Audit/Review Recommendation No. 19: Remove language not pertinent to the competitive examining process from all Delegated Examining vacancy announcements, e.g., TIG requirements, VEOA statements, SF-50's, etc. 5 CFR 330.707 (b.)

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Management Decision on Follow-through: BPA will discontinue the use of DEU related requirements or authorities in Merit Promotion Vacancy Announcements.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Nine vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. After review of all nine delegated examining vacancy announcements in the sample, no language suggesting an unfair advantage to outside candidates was identified. All language within the examined announcements appeared reasonable. Completion Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 20: BPA should establish a position description library which will assist in the housing of all classified position descriptions and the evaluation statements that support each classified PD. In the event of BPA's next HCMAP audit, for all selected positions, BPA should be able to pull each PD and Evaluation Statement, make copies (file the original back in library) and provide to the HCMAP team up request.

Management Decision on Follow-through: Going forward, BPA will ensure that the position description for each new vacancy has a clear evaluation statement attached.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Ten vacancy announcements were picked at random for a sample of new hires from 1/1/2012 to 12/31/2012. The position description software was observed and deemed the documents could be provided upon request. No exceptions were noted for the position descriptions. However, the evaluations for each position were not in the case file. Ten exceptions for the evaluation statements. Completion Date: September 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: The position descriptions are available when requested. However, this recommendation is partially implemented since evaluation statements are not in the case file. There are ten exceptions for the evaluation statements.

Audit/Review Recommendation No. 21: Discontinue the use of educational, licensure, certification requirements, or degrees of proficiency in factor descriptions unless these requirements can be validated and are required by the position. Try focusing on special knowledge or skill requirements that are essential to successful performance. Reference: The Classifiers Handbook

Management Decision on Follow-through: BPA currently uses educational, licensure and certification requirements only when relevant and required for the position. It is current practice not to use positive education requirements in the factor evaluation for positions.

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Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Seven vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Reviewed the various announcements and factor descriptions looking for any language referencing education, licensure or certification requirements that was required by the position. An exception was noted with a welder position requesting college transcripts since education was not a required element for the position nor was it listed within the factor descriptions for the rating process. Completion Date: September 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: The recommendation does not appear to be fully implemented. One exception was noted.

Audit/Review Recommendation No. 22: Include all documentation that justifies management and HR's decision regarding accretion of duties promotion actions. There should be documentation that shows a comparison of old duties to new duties, whether other employees were effected or not, whether the accretion was a planned management action, etc. Suggest creating a checklist covering all aspects of the classification and staffing process to ensure that no merit system principles were violated.

Management Decision on Follow-through: BPA HCM Policy Unit has prioritized review of the Personnel Letter on Accretions to ensure that a thorough review of the relevant organizational chart ensures that no other employee is adversely affected from a merit systems perspective. Further, the Personnel Letter will reinforce the concept that an accretion should not change supervisory or lead status, or the series of the job. Target date: June 2012

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: From a population of three, selected a sample of three for testing for employees receiving accretion of duties during the period 1/1/12 through 12/31/12. Reviewed each accretion of duties memo to confirm that each provided justification of management and HR's decision regarding the accretion of duties promotion actions, whether there was comparison of old duties to new duties, whether other employees were affected or not, whether the accretion was a planned management action, whether there was a change in supervisory/lead status and a change to the series of the job. Three inconsistencies with two employees in the sample were noted:

- Inadequate language comparing old duties to new ones
- No language to insure no other employees were impacted
- No mention of a change in supervisory/lead status or change in series mentioned

The personnel letter has not been updated to reflect language noted in the recommendation.

In addition, no checklist covering the classification and staffing process has been created to ensure that no merit system principles are violated. Completion Date: June 2012.

Internal Audit Evaluation of Action Taken vs. Management Decision: This recommendation does not appear fully implemented with two exceptions noted. The personnel letter should be

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updated and a checklist should be created to ensure no merit system principles are violated.

Audit/Review Recommendation No. 23: Issue timely Notices of Results to all applicants.

Management Decision on Follow-through: Some Notices of Results intended to automatically send to applicants at each of four the critical stages were not sent as a result of a system error in HRMIS. BPA has identified and corrected the error so that NORs are sent to candidates at every stage of the staffing process as outlined in the DOE memorandum.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Since AVUE is currently processing all applications, all NORs are automatically sent from AVUE. Obtained an AVUE automation log and AVUE communications based on two positions posted in the Fall of 2012. Due to the newly implemented AVUE system, automatic emails are sent when a candidate reaches each step of the hiring process. The sample includes the automatic emails that were sent or the communication within the AVUE system. Reviewed the emails and confirmed they were sent at reasonable times.

(In addition to the AVUE system being tested, obtained a sample of ten new hires from 1/1/2012 to 12/31/2012 to test the manual process in place prior to AVUE. Observed a printout of communications sent to candidates throughout the hiring process for the sample. No exceptions were noted.) Completion Date: September 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 24: Begin to keep and maintain OPF's according to departmental policy and the Guide to record keeping. Ensure that there is a record of all student agreements as it pertains to the overall SEEP program.

Management Decision on Follow-through: BPA has successfully implemented eOPF. BPA has maintained OPF's according to departmental policy and the Guide of record keeping. We currently maintain records of all student agreements.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Obtained a copy of a recent audit done in FY12 in internal audit regarding the tuition assistance program. Included with that audit, student agreements were obtained with no exceptions noted. The entire population was included in the sample for the school year September 2011/August 2012. Since that audit did not include testing whether the student agreements were included in eOPF, additional testing is necessary.

The population for the school year September 2012/August 2013 includes 66 students. From that population, a randomized sample size of 14 students was selected for testing. Obtained Pathway's Participation Agreements as well as screen shots from eOPF. All agreements were

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obtained from the eOPF system. No exceptions were noted. Completion Date: January 2013

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 25: The department has created a single Reemployment Priority Lists (RPL) based on geographic locations for which all components within the local commuting area must clear. Case files must be indicative of the RPL clearance process.

Management Decision on Follow-through: We are working with DOE to establish appropriate process and in our transition to AVUE; we are working on incorporating the RPL process. We are currently operating in an interim process which will be finalized by the end of year and include our SOP process and management of RPL.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Per discussion with Charley Mantei, the RPL comes from a RIF (reduction in force) from each agency. BPA hasn't had a RIF. Therefore, there is no RPL for BPA. There would only be a RPL as it would relate to DOE. DOE has said they will manage the RPL if there is any for BPA. BPA has written a SOP for the RPL process as requested by the DOE.

Obtained the RPL SOP. Reviewed the procedures for language that there is an RPL for different geographical locations. Noted that page 3 of the SOP indicates that the Assistant will email or telephone DOE to request a current list of RPL candidates for the local commuting area of the position being advertised/filled. The Assistant asks DOE to respond in writing and to provide RPL candidate applications. The RPL SOP states that the RSA will document the case file accordingly. This process will meet the recommendation and the management decision. Case files are not indicative of the RPL clearance process at this time but should be going forward. However, according to Ex 6, since BPA hasn't had a RIF and there aren't any other DOE locations at BPA sites, it is unlikely that there would have been any RPL candidates involved in BPA hirings to date. Therefore, no exceptions will be considered for this testing. Passed on further testing of files due to the low risk related to this recommendation. Completion Date: March 2013

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

Audit/Review Recommendation No. 26: Ensure that all candidates' qualifications are reviewed and assessed in accordance with the Qualification Standards and any other rating criterion that is directly related to the position being filled.

Management Decision on Follow-through: BPA has transition to AVUE that provides automated assessment which enforces additional controls supplemented by a Position Management SOP and Assessment SOP that are both currently in draft form and will be finalized as we continue to implement AVUE.

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Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Ten vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Examined the vacancy announcement files for completed review checklists which are consistent with the SOPs. Reviewed the date on the checklist to ensure it was prior to the date of the certificate of eligibles. Noted that three files failed to include the qualification standards and/or crediting plan. Could not assure that all candidates' qualification standards were reviewed for these exceptions. However, with the implementation of AVUE, this process is no longer in use.

The Position Management SOP was finalized 1/24/13 and the Assessment Approach SOP was finalized 3/7/13. Both SOPs have been placed into use.

When a candidate applies through AVUE, the system automatically determines if the applicant minimally qualifies based on how the questions are answered. If the candidate meets minimum qualifications, NHQ will review the applications and select the top for manager review. Only if that candidate is not selected would annotation be noted within the AVUE system. Obtained an AVUE log which shows the annotation for why a candidate was not selected. Observed the AVUE system hiring processes proceed for the case selected at random and verified that AVUE enforces additional controls supplemented by a Position Management SOP and an Assessment SOP that have both been finalized as indicated in the Management Decision for this Recommendation. However, there was no direct evidence that candidates' qualifications are reviewed and assessed. The qualification standards can be seen as applied due to applicants being found qualified and not qualified. However, there are questions about whether the right qualification standards were used in the assessment. We make a basic assumption that AVUE was set up and has been maintained correctly so we have reasonable assurance that the qualification standards are properly applied in AVUE. Completion Date: September 2012

Internal Audit Evaluation of Action Taken vs. Management Decision: The manual process was tested and three exceptions were found. AVUE, the current automated process, appears to be implemented, was tested without exception. Therefore, no remediation is needed for this recommendation.

Audit/Review Recommendation No. 27: Certify eligible applicants by grade level and numerical rating (when applicable) augmented by veterans' preference status accordingly. Ensure that veterans' preference is applied and annotated accurately whenever applicable.

Management Decision on Follow-through: In addition to training our staff, BPA has transition to AVUE that enforces Federal rule logic for veterans preference based on individual applications. In addition, NHQ will continue a second review prior to issuing any certificates.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Ten vacancy announcements were selected at random for a sample of new hires from 1/1/2012 to 12/31/2012. Four of the files did not include any candidates with veterans' preference so that left 6 for actual testing. Reviewed and discussed veterans' preference rule logic for each candidate in the sample with Charley Mantei. Reviewed the documentation to determine if qualified veterans receive

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preference and the proper annotation was included. Did not find any candidates that were qualified veterans who were passed over. One exception was found where a veteran candidate file failed to have an annotation.

When a veteran candidate applies through AVUE, the system automatically assumes they are a preference candidate. If the candidate meets minimum qualifications, NHQ will review the DD-214 (veteran preference form) to determine if the candidate was indeed a preference. Only if that candidate is not an eligible veteran would annotation be noted within the AVUE system.

Observed the AVUE system and noted that the test of one (vacancy announcement 200277) confirmed that AVUE system automatically flagged the two veterans within the applicant pool as veterans. No annotation was noted for this vacancy announcement. We observed that the system didn't float a 30% or over veteran. Therefore, a 30% or over veteran applicant needs a manual workaround (system over-ride) because AVUE is not correctly automated. This is a known problem. This is needed to ensure proper treatment of the applicant when they are a 30% or over veteran.

The Management Decision indicates that AVUE enforces Federal rule logic for veteran's preference. AVUE is set up to allow the applicant to indicate veteran's preference. However, the system falls short of ensuring Federal rules for veteran's preference. Therefore, it does not appear that AVUE can guarantee enforcement of the Federal rules for veterans preference based on individual applications. Additional testing of a sample would be needed to add comfort in this area.

Two of the ten files did not contain a checklist; therefore, there was no evidence that NHQ conducted a second review prior to issuing the certificate. Two additional exceptions were noted in the ten files from the sample. Completion Date: 12/31/2011

Internal Audit Evaluation of Action Taken vs. Management Decision: This recommendation does not appear effectively implemented since three exceptions were noted. One file failed to have veterans' preference annotated and two files had no evidence of review prior to issuing the certificates. The following issue was noted: If a candidate uploads their DD-214, but fails to select the veteran's preference, AVUE will not flag them as preference.

Audit/Review Recommendation No. 28: Establish procedures for objections and requesting veteran passovers.

Management Decision on Follow-through: BPA follows guidelines in DEU handbook for pass over procedure.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: The standard operating procedure Objections and Veteran Pass-Over Requests was obtained. Confirmed that the new Objections and Veteran Pass-Over Request standard operating procedure was consistent with the DEU Handbook. Completion Date: September 2011

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken and management decision appear consistent. The recommendation appears implemented.

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Summary of Internal Audit Verification of Completed Actions			Date: 2/13/13
Audit/Review Verified			
Title:	Close-out Review of HCM EPIP Project		No. and Date 32124-72
Owner (Org.):	Ex 6	Internal Control Oversight Team Representative:	Ex 6
Internal Audit Verification Results			
<p><u>Audit/Review Recommendation No. 1:</u> Human Capital Management should determine how automation benefits intended for EPIP sub-projects R6021 and R6026 can best be achieved and document the decision and schedule for required process changes (i.e., consolidation in HRMIS or SharePoint, or alternative changes).</p> <p><u>Management Decision on Follow-through:</u> Will take alternative or modified action. Automated Leave Request was implemented. There are no plans to consolidate all personnel actions into Service Connection as originally envisioned. We request that this item be closed.</p> <p><u>Action Owner(s), Organization:</u> Ex 6</p> <p><u>Information That Confirms Action Taken and Completion Date:</u> Recommendation no. 1 refers to sub-projects R6021 and R6026. A sub-project is a specific Human Capital Management (HCM) EPIP Project.</p> <p>Sub-project R6021 refers to the Automated Leave Request. On March 4, 2013, Internal Audit (IA) obtained a link to BPA’s Leave Calendar’s frequently asked questions (FAQs) website. The FAQs website evidences that the Automated Leave Request has been implemented through SharePoint.</p> <p>Sub-project R6026 refers to the Personnel Action PIP. Ex 6 stated that the plans to consolidate all personnel actions into Service Connection were determined to be out-of-scope. In a follow-up conversation with Ex 6 clarified Ex 6’s statement by stating that personnel actions go through either Service Connection or HR Help. This is evidenced by the Service Connection internal webpage, under the “Personnel” section (click on the expand button to see personnel actions available through Service Connection). Also, the HR Help internal webpage lists some examples of personnel actions that HR Help can assist with. These include: Requests for name changes, copies of position description or personnel actions, etc.</p> <p>IA reviewed the evidence provided by Ex 6 and Ex 6 and determined that sub-projects R6021 and R6026 were considered for automation benefits. Sub-project R6021 was implemented through SharePoint and R6026 was implemented through Service Connection and HR Help instead of entirely through Service Connection.</p>			

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There is no definite date of completion that could be determined for sub-project R6026. However, per conversation with Ex 6, 2010 is the approximate completion year for sub-project R6026. The implementation date of Service Connection to address sub-project R6021 could not be obtained. The implementation date of HR Help to address sub-project R6021 was July 23, 2012.

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken is consistent with management decision. The alternative or modified action taken by management has been implemented.

Audit/Review Recommendation No. 2: Human Capital Management should determine and document a revised schedule to obtain approved funding and complete work on the e-performance component of EPIP sub-project R6018.

Management Decision on Follow-through: Will take recommended action. Planning is complete. E-performance is currently on-track for implementation in FY14. We request that this item be closed.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Recommendation no. 2 refers to sub-project R6018. A sub-project is a specific Human Capital Management (HCM) EPIP Project.

The recommendation refers to sub-project R6018, which refers to the Performance Management project. IA obtained an e-mail response on March 2, 2013 from Ex 6 containing a revised E-performance implementation schedule to obtain approved funding and complete work on sub-project R6018. The revised schedule is as follows:

September 1, 2013 - ePerformance for managers (annual managers and supervisors)

September 1, 2014 - ePerformance for employees (annual employees, hourly employees, hourly supervisors)

Note: In the e-mail dated March 5, 2013, Ex 6 stated, "We are 1 year behind based on the most recent timeline." To avoid confusion, she only stated that to explain that implementation is

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not scheduled until September 1, 2014, which she considered practically FY15. However, September 1, 2014 is still considered FY14 so they are still on track.

The schedule was completed March 1, 2013.

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken is consistent with management decision. The recommended action taken by management has been implemented.

Audit/Review Recommendation No. 3: Business Process and Continuous Improvement should obtain input from Service Connection users on EPIP sub-project R6027 needs, including manager and COTR training, and use the inputs in continuous improvement efforts.

Management Decision on Follow-through: Will take recommended action. Service Connection users were consulted and their inputs obtained 3/2/11. (Per Ex 6 .) Service Connection as a project has been closed out and turned over to the organization NB for Operations. We request that this item be closed.

Internal Auditor Note: They inaccurately stated that Service Connection was moved to organization NB. They meant to refer to organization NJO.

Action Owner(s), Organization: Ex 6 and
Ex 6

Information That Confirms Action Taken and Completion Date: Recommendation no. 3 refers to sub-project R6027. Specifically, sub-project R6027 refers to the Service Connection project.

IA obtained from Ex 6 (succeeding process owner for the Service Connection project) a record of Service Connection users' inputs and corresponding changes that took place along with the dates of release of each change. He explained that the inputs obtained provide reason behind the integration of Service Connection, CRM, and HRmis in spring of 2011. The record of inputs provides adequate evidence that Service Connection users' were consulted and their inputs were obtained on Service Connection needs. Also, the changes applied after spring 2011 evidences ongoing improvement efforts.

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In addition, IA obtained excerpts of the reorganization package, which evidences the move of sub-project R6027 to the NJO (Information Technology) organization to continue operations.

Internal Audit Evaluation of Action Taken vs. Management Decision: There is adequate evidence of Service Connection users' inputs regarding Service Connection needs regarding and that inputs were used for continuous improvement efforts. Thus, the recommended action has been implemented.

Audit/Review Recommendation No. 4: Human Capital Management should review the HCM EPIP's 27 sub-projects to confirm and document those considered fully or substantially complete and those still scheduled for future completion, and to adequately document all decisions made to not implement sub-projects.

Management Decision on Follow-through: Will take alternative or modified action. The Agency 2011 Talent Management Strategy established priority initiatives for implementation. Priority areas were identified as 1) Drive high performance in the federal workforce, 2) Improve accessibility, efficiency, and effectiveness of federal hiring process, 3) Improve ability to anticipate and meet Agency skill and competency needs. Please refer to FY11 & FY12 Talent Management KAT and Engagement and Diversity XATs for specific implementation initiatives and outcomes. We request that this item be closed.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: Since management took alternative or modified action, all of the 27 sub-projects were not tracked. Instead, three priority initiatives were chosen for implementation that relate to 13 in-scope sub-projects. Ex 6 provided BPA's 2011-2012 Talent Management Strategy, which is an integrated strategic plan for shaping and maintaining the Agency's workforce. The document identifies the three priority initiatives chosen for implementation:

- 1) Drive high-performance in the federal workforce;
- 2) Improve accessibility, efficiency, and effectiveness of federal hiring process; and
- 3) Improve ability to anticipate and meet agency skill and competency needs

Obtained and reviewed Talent Management (TM) Quarterly Reports for FY11 and FY12: These reports include specific implementation initiatives and outcomes related to the three priority initiatives. Four reports were obtained for FY12 Q1-Q4:

- a. FY12 Q1 BOB Report.docx
- b. FY12 Q2 BOB Report.docx
- c. FY12 Q3 BOB Report.docx

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d. FY12 Q4 BOB Report.docx

The outcomes of specific initiatives are expressed in writing and in a color key (e.g. green =on track, red=not on track). Thus, these reports provide sufficient documentation that HCM developed key metrics and monitoring procedures for improvements.

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken is consistent with management decision. The alternative or modified action taken by management has been implemented.

Audit/Review Recommendation No. 5: Human Capital Management should crosswalk the EPIP recommendations to the “HCM Roadmap” of current sub-projects and assure that all relevant deliverables have a designated owner with documented accountability for continuous improvement and monitoring as outlined in the Project Closure Process requirement (June 16, 2008).

Management Decision on Follow-through: Will take alternative or modified action: The Agency 2011 Talent Management Strategy established priority initiatives for implementation. Priority areas were identified as 1) Drive high performance in the federal workforce, 2) Improve accessibility, efficiency, and effectiveness of federal hiring process, 3) Improve ability to anticipate and meet Agency skill and competency needs. Please refer to FY11 & FY12 Talent Management KAT and Engagement and Diversity XATs for specific implementation initiatives and outcomes. We request that this item be closed.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: As evidence, Ex 6 provided the 2011-2012 Talent Management Strategy. BPA’s Talent Management Strategy is an integrated strategic plan for shaping and maintaining the Agency’s workforce. The document identifies the following three priority initiatives chosen:

- 2) Drive high-performance in the federal workforce;
- 3) Improve accessibility, efficiency, and effectiveness of federal hiring process; and
- 4) Improve ability to anticipate and meet agency skill and competency needs

Obtained and reviewed Talent Management (TM) Quarterly Reports for FY11 and FY12: These reports include specific implementation initiatives and outcomes related to the three priority

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initiatives. For FY12, four reports were obtained:

- a. FY12 Q1 BOB Report.docx
- b. FY12 Q2 BOB Report.docx
- c. FY12 Q3 BOB Report.docx
- d. FY12 Q4 BOB Report.docx

The outcomes of specific initiatives are expressed in writing and in a color key (e.g. green =on track, red=not on track). The reports provide documentation of accountability for Human Capital Management and are used for continuous improvement and monitoring, which relates back to the recommendation.

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken is consistent with management decision. The alternative or modified action taken by management has been implemented.

Audit/Review Recommendation No. 6: Human Capital Management should identify and implement techniques to effectively measure internal customers' satisfaction with specific HCM programs.

Management Decision on Follow-through: Will take alternative or modified action: HCM implemented various transactional surveys and a Hiring Manager Survey. In FY12, HCM launched the HR HELP and the Talent Acquisition System feedback surveys. We request that this item be closed.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date IA obtained from Ex 6 the FY12 HR Help feedback survey results. The HR Help survey evaluated reasons why internal customers contact HR Help and asks questions pertaining to their satisfaction or dissatisfaction with different attributes such as communication, professionalism, quality, timeliness, etc.

IA also obtained the Talent Acquisition System feedback survey/hiring survey along with survey results for FY12 from Ex 6. To clarify, there is only one survey called the Manager Satisfaction survey, which evaluates both the Talent Acquisition System and the hiring process. The link to the survey provided shows statements related to Talent Acquisition System and hiring and requires the surveyor to rate each statement from "strongly disagree" to "strongly agree." The results from the survey were summarized in the chart provided by Ex 6.

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These surveys were the techniques used by HCM to effectively measure internal customers' satisfaction with specific HCM programs such as hiring and talent acquisition.

The survey results were obtained in year 2012.

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken is consistent with management decision. The alternative or modified action appears to be implemented.

Audit/Review Recommendation No. 7: Human Capital Management should identify methods to obtain timely inputs on quality of candidates and hiring satisfaction for use in monitoring ongoing effectiveness of related EPIP improvements.

Management Decision on Follow-through: Will take alternative or modified action: HCM began implementation of an automated Talent Acquisition System in September 2012. It will obtain timely inputs on quality of candidates and hiring satisfaction for use in monitoring ongoing effectiveness. We request that this item be closed.

Action Owner(s), Organization: Ex 6 , Ex 6

Information That Confirms Action Taken and Completion Date: IA obtained an article from BPA's internal website pertaining to the automation of the hiring system, which BPA refers to as the Talent Acquisition System. The article states the system was ready for use on September 4, 2012. According to the article,

“The online system automates and standardizes steps in posting and applying for jobs. We'll also make significant strides in reducing the amount of paper used during the hiring process while saving everyone time through a more efficient process. The initial launch is just the beginning look for enhancements through the rest of the calendar year and beyond.”

To obtain timely inputs on quality of candidates and hiring satisfaction, HCM implemented a Hiring Manager survey and kept record of the survey results for use in ongoing monitoring.

Completion date for Talent Acquisition System was September 4, 2012. Completion date for survey was year 2012.

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Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken is consistent with management decision. The alternative or modified action taken by management has been implemented.

Audit/Review Recommendation No. 8: Human Capital Management should develop a key metric(s) and monitoring procedures for improvements under each HCM EPIP sub-project implemented (as identified in actions under Recommendation 4) whenever feasible, or document why a development is infeasible.

Management Decision on Follow-through: Will take alternative or modified action: As part of the Talent Management Strategy and in consultation with the BOB, key metrics for our HR programs are identified, tracked and reported quarterly. We request this item to be closed.

Action Owner(s), Organization: Ex 6

Information That Confirms Action Taken and Completion Date: IA obtained from Ex 6 the Talent Management Quarterly Reports for FY12. These reports track key metrics related to the HCM EPIP sub-projects. The reports include details on implementation and progress tracking throughout the year. Specifically, implementation and progress are expressed in writing and in a color key (e.g. green=on track, red=not on track). These reports provide sufficient documentation that HCM developed key metrics and monitoring procedures for improvements.

Internal Audit Evaluation of Action Taken vs. Management Decision: The action taken is consistent with management decision. The alternative or modified action taken by management has been implemented.

memorandum

Bonneville Power
Administration

DATE: February 27, 2012

REPLY TO
ATTN OF: DNG-7

SUBJECT: NHI Project – Measuring Business Outcomes (Performance Auditing)

TO: Ex 6 Ex 6

As you requested, we have been providing consulting services to Ex 6 is developing a future vision for Performance Auditing within HCM. Objective of the Performance Auditing future vision is for the proactive and timely resolution of problem areas identified, increased regulatory compliance within HCM programs and reduction of the audit requirements imposed by the DOE. Following is a summary update of the objective and scope of this phase of our consult services and some suggestions made for advancing the development of the future vision.

Summary of Objective

BPA currently has a requirement from the DOE to perform a quarterly self-audit on personnel actions and recruit actions and provide the results back to the DOE. BPA's self-audits are conducted by NHI personnel. We were asked to help facilitate a review of the current state of past self-audit results, with the goal of aiding HCM in defining a framework and tools for categorizing and tracking infractions for timely correction and for identifying and addressing underlying root causes.

Scope and summary of review

NHI provided us the following documents prepared from their self-audits for our review:

- FY11 DOE Quarterly Self-Audit – Q1 Results
- FY11 DOE Quarterly Self-Audit – Q2 Results
- PAR/eOPF¹ – Preliminary List of Issues² with 4th Qtr 2011 Audit
- Recruit – Preliminary List of Issues³ with 4th Qtr 2011 Audit

We limited our review to the documentation provided and did no further validation of the accuracy of the self-audit results. Our review included discussions with various HCM personnel to clarify some of the listed infractions as documented in the above documents.

Based upon our review and discussions of NHI's quarterly self-audit results, the following current state was indicated:

- Significant volume of infractions
- Reviewers of documentation not catching infractions

¹ Personnel Action Request/electronic Official Personnel Folder

² "Issues" has the same meaning as "infractions."

³ See footnote 2 above.

- Repeat infractions
 - Missing information/documentation
 - Data/coding errors
 - Lack of consistency with documentation preparation

Examples of specific repeat infractions include, but are not limited to, the following:

- Illegal hiring
- Selection of wrong candidates
- Selection of candidates from expired certificates
- Personnel actions not signed timely
- Missing application
- Late applications accepted
- Educational Degree information not verified
- Missing signatures

Summary of suggestions

During our discussions, suggestions for process improvements were provided to **Ex 6** efforts to define a framework and tools for categorizing and tracking infractions for timely correction and for identifying and addressing underlying root causes. Following is a summary of our suggestions:

- NHI should provide quarterly written communication of self-audit results timely to HCM management and NHO/NHQ personnel as applicable.
- NHI should define procedures for overseeing corrections, implementing remediation, providing communication, and providing training processes.
 - HR Specialists and Assistants in NHO and NHQ should receive quarterly training to address specific infractions and underlying process issues identified in self-audits results.
 - NHO and NHQ should define reviewer knowledge and experience requirements and assign reviewers that have sufficient experience and training to review documentation and identify infractions.
 - NHI should identify owners in NHO and HNQ to oversee corrections of infractions, to oversee remediation of underlying root causes to prevent repeat infractions, and to provide quarterly training related to the infractions identified in the self-audits.
 - NHI should submit audit results to DGC for monitoring of timely corrections and remediation of underlying process issues using the BART (BPA Audit Resolution Tracking) process, which is used for tracking resolution of BPA's internal and external audit results.
 - NHO and NHQ should define procedures for HR Specialists and Assistants to follow in the file preparation and review processes. These procedures should be written, organized formally, reviewed and updated regularly and readily available.

I look forward to continuing to work with Ex 6 as HCM's future vision of performance auditing develops. If you have any questions, please contact me at extension Ex 6.

Ex 6

Internal Audit– DNG

cc:

Ex 6

Official File – DN (36146-01)

Ex 6 :2/27/2011(Report – NHI Perf Aud Cons 12 - memo)

From: Ex 6
Sent: Tuesday, September 18, 2012 4:23 PM
To: Ex 6
Cc:
Subject: Ethics Hotline Case BPA-12-06-0003

Ex 6 Per our conversation, I summarized my investigation of the referenced hotline case below. Please let me know if you have any questions.

The complaint regarding Ex 6 was investigated based on a request made to me on June 13th by Ex 6 and Ex 6. Ex 6 had received a complaint anonymously in a blue envelope stating a hiring manager had to select an unqualified veteran because of an error that HCM staffing made. She had scanned the document and sent it to as well as Ex 6 scheduled a meeting with me and Ex 6 to discuss the complaint.

Ex 6 and I discussed the complaint and I agreed to perform some background research into the underlying hire process by contacting Ex 6 to review the personnel file with me to determine if there appeared to be any basis for this complaint.

The original objective was for Ex 6 to get the file and review it with me to determine if the employee was indeed "unqualified" and to understand why he was hired if he was unqualified. I contacted Ex 6 and requested that she meet with me after she obtained the file. She obtained the file from Ex 6 and Ex 6 reviewed the file prior to meeting with me. They concluded that the employee was unqualified, as he had failed the technical interview, but proper procedures were followed for this candidate that was a disabled veteran. I met with and Ex 6 and they verbally provided me this summary.

I reported back to Ex 6 and Ex 6 what I had learned from Ex 6 and Ex 6. Ex 6 didn't think it made sense for BPA to hire someone that failed the technical interview. She asked me to contact the hiring manager to get further explanation as to why the candidate was hired after failing the technical interview.

Ex 6 had been Ex 6 supervisor. I was not able to contact him but learned that he had unexpectedly retired the week before. I reported back to Ex 6 that I wasn't able to reach Ex 6. She obtained Ex 6 home number and gave that to me. I phoned and discussed the situation with him. He said he wasn't the one that made the decision. He referred me to his manager Ex 6 (district manager). I contacted and he said he didn't make the decision. He referred me to Ex 6, his manager (regional manager). I contacted Ex 6 who told me that Ex 6 the chairman on the interview committee made the decision. Ex 6 said he had approved that decision after discussing it with

Ex 6 suggested that I contact Ex 6 and get additional information from him so I called him as well.

I met with Ex 6 and Ex 6 to discuss the information that I had obtained from these interviews. Ex 6 requested that I contact the HR specialist that worked on this particular case to confirm the information provided to me by the managers interviewed.

As requested, I scheduled and met with Ex 6, Ex 6, and Ex 6 (all in NHQ) individually since they had all been involved with the hiring of Ex 6. From these interviews, I was provided a copy of the actual vacancy announcement (9353-11-DE-A1) and was referred to the DEU rules, and Veterans' Guidance documents to explain the hiring of Ex 6. I reviewed these documents and then met a second time with Ex 6 and Ex 6 together to discuss my understanding of the situation and to confirm it.

After all the interviews, I concluded that the situation was as follows:

Inadvertently, the vacancy announcement did not require the technical interview before making a determination of minimum qualification. The draft vacancy announcement had all the proper reviews, including OPM's review, but this error was not noticed during the review process. After Ex 6 was determined not qualified from failing a technical interview, he contacted HCM to request another interview and to bring to their attention that he thought he was qualified based on the vacancy announcement's statement of minimum qualifications. HCM reviewed the vacancy announcement, the file, OPM regulations and relevant laws, and realized that the vacancy announcement was in error and the candidate did meet minimum qualifications.

To correct the file, HCM re-ran the certificate of eligible candidates to include Ex 6. Because the candidate met minimum qualifications (from the rating portion of the process) and was a preference candidate (disabled veteran), he floated to the top of the certificate of eligible candidates ahead of other non-veterans. He was not required to take and pass the technical interview to meet minimum qualifications.

The hiring manager did not want to hire Ex 6 because he failed the technical interview that is part of the selection process for the position. HCM told the hiring manager that they could close the vacancy announcement and reopen a new vacancy announcement to correct the error with the existing vacancy announcement. The hiring manager decided not to do that because they were already six months in getting to this point in the hiring process. (It took until April to get the new hires onboard - a ten month process to hire.) This situation and decision to hire Ex 6 was discussed and approved by the regional manager and Ex 6

Ex 6 was offered and accepted a position for the announcement. Ultimately, six applicants on the certificate were hired - all three veterans and three non-veterans.

Based upon discussions held and documentation reviewed, Ex 6 was qualified based upon the criteria of the vacancy announcement. The HCM process followed was in accordance with applicable rules and regulations.



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

FREEDOM OF INFORMATION ACT/PRIVACY PROGRAM

April 18, 2014

In reply refer to: D-B1

Dan Seligman
Columbia Research Corporation
PO Box 99249
Seattle, WA 98139

FOIA #BPA-2013-01448-F

Dear Mr. Seligman:

This is a partial response to your request for records that you made to the Bonneville Power Administration (BPA), under the Freedom of Information Act, 5 U.S.C. 552.

You requested the following:

“All other audits and investigation reports since October 1, 2009 related to the operation of BPA’s Human Capital Management office. The term “audit” includes internal audits conducted by BPA staff...and BPA contractors (e.g., AVUE Technologies).”

Response

BPA is releasing the enclosed audit reports with certain information redacted under Exemption 6 (5 U.S.C. § 552(b)(6)) of the FOIA.

Exemption 6 protects information in “personnel and medical files and similar files” when the disclosure of such information “would constitute a clearly unwarranted invasion of personal privacy.” Exemption 6 requires balancing the public interest in the information against the individual privacy interest at issue. Here, we assert this exemption to redact information that could reasonably identify individuals who have applied for positions at BPA.

Information that falls under Exemption 6 cannot be discretionarily released; the right of privacy belongs to the individual, not to the agency. Therefore, we did not analyze this information under the discretionary release guidelines in Attorney General Holder’s March 19, 2009, FOIA Memorandum.

BPA is still processing four additional audits; one that requires an Exemption 4 analysis. We estimate we can provide you with another partial release by Friday, June 20, 2014.

Please contact Kim Winn, FOIA Specialist, at 503-230-5273 with any questions about this letter.

Sincerely,

/s/Christina J. Munro

Christina J. Munro

Freedom of Information/Privacy Act Officer

Enclosure: CD

FY 2011 - 4th Quarter - Category Ranking Scores and Information

EmplID	Name	DeptID	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)				BB	(b) (6)		9/25/2011	101	(b) (6)	84	
				GS			7/3/2011	101		91	
				GS			7/3/2011	101		GS-09 =91 GS-07 =94 GS-05 = 91	GS-07: HRMIS says 94, however, the scores for the selectees were not in there? GS-05: HRMIS says 91, however, the 3 applicants had scores 80-84 and there were qualified applicants with higher grades? PULL CASE FILE TO CHECK CERTS.
				GS			7/3/2011	101		GS-09 =91 GS-07 =94 GS-05 = 91	GS-07: HRMIS says 94, however, the scores for the selectees were not in there? GS-05: HRMIS says 91, however, the 3 applicants had scores 80-84 and there were qualified applicants with higher grades? PULL CASE FILE TO CHECK CERTS.
				GS			7/3/2011	101		GS-09 =91 GS-07 =94 GS-05 = 91	GS-07: HRMIS says 94, however, the scores for the selectees were not in there? GS-05: HRMIS says 91, however, the 3 applicants had scores 80-84 and there were qualified applicants with higher grades? PULL CASE FILE TO CHECK CERTS.
				GS			7/3/2011	101		GS-12 = 96 GS-11 = 99 GS-09 = 99	
				GS			7/3/2011	101		GS-12 = 100	There was a 5 pt TP vet who should have been on top but nothing in HRMIS to show why she wasn't on the cert. PULL CASE FILE TO CHECK CERTS
				GS			7/17/2011	101		GS-07 = 91	

FY 2011 - 4th Quarter - Category Ranking Scores and Information

EmplID	Name	DeptID	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)				GS	(b) (6)		7/17/2011	101	(b) (6)	GS-11 = 81 GS-09 = 95 GS-07 = 100	
				GS			7/3/2011	101		GS-11 = 81 GS-09 = 95 GS-07 = 100	
				GS			8/14/2011	101		GS-11 = 81 GS-09 = 95 GS-07 = 100	
				GS			7/3/2011	108		GS-11 = 90 GS-10 = 91 GS-09 = 91	
				GS			7/3/2011	108		GS-13 = 91	Verify CPS vet declined the job.
				GS			7/3/2011	108		GS-13 = 91	Verify CPS vet declined the job.
				GS			7/3/2011	101		GS-12 = 91 GS-11 = 91 GS-09 = 91	GS-12: Only one qualified applicant
				GS			7/31/2011	101		GS-11 = 91 GS-09 = 91	
				GS			7/17/2011	101		GS-11 = 91 GS-09 = 91	
				GS			9/25/2011	101		GS-14 = 94	
				GS			8/28/2011	108		GS-12 = 91	
				GS			8/14/2011	108		GS-13 = 91 GS-12 = 91	
				GS			9/11/2011	108		GS-13 = 91 GS-12 = 91	

FY 2011 - 4th Quarter - Category Ranking Scores and Information

EmplID	Name	DeptID	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)				GS	(b) (6)		9/25/2011	101	(b) (6)	GS-12 = 91 GS-11 = 91 GS-09 = 91	
				GS			9/25/2011	101		GS-12 = 85 GS-11 = 91 GS-09 = 91	GS-12 - Only 3 qualified applicants - all referred
				GS			9/25/2011	101		GS-12 = 85 GS-11 = 91 GS-09 = 91	GS-12 - Only 3 qualified applicants - all referred
				GS			9/11/2011	101		GS-12 = 85 GS-11 = 91 GS-09 = 91	GS-12 - Only 3 qualified applicants - all referred

FY 2012 - 2nd Quarter - Category Ranking Scores and Information

EmplID	Name	DeptI D	Position #	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)					GS	(b) (6)		1/6/2012	101	(b) (6)	GS-15 = 85	
					GS			2/12/2012	101		GS-12 = 96 GS-11 = 96	
					GS			3/25/2012	108		GS-12 = 91 GS-11 = 91 GS-09 = 91	
					GS			3/25/2012	108		GS-12 = 91 GS-11 = 91 GS-09 = 91	
					GS			1/1/2012	108		GS-11 = 98 GS-09 = 96	CPS Veteran hired
					GS			1/1/2012	108		GS-11 = 98 GS-09 = 96	CPS Veteran hired
					GS			1/29/2012	101		GS-11 = 91 GS-09 = 99	
					GS			1/15/2012	101		GS-11 = 91 GS-09 = 90	Need to verify if GS-09 cert was issued because in HRMIS it appears that there were CPS, CP & TP vets who should have been on the cert. (no selection from GS-09)
					BB			1/15/2012	101		91	
					GS			1/29/2012	501		GS-13 = 91	
					GS			1/29/2012	101		GS-09 = 91	
					GS			1/15/2012	101		GS-11 = 91	

FY 2012 - 2nd Quarter - Category Ranking Scores and Information

EmplID	Name	DeptI D	Position #	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)						(b) (6)				(b) (6)	GS-13 = 85	(GS-11 = in HRMIS 93, but no Q applicants lower)
					GS			1/29/2012	101		GS-12 = 83	
					GS			3/11/2012	108		GS-11 = 91	
					BB			3/11/2012	101		GS-12 = 85	
					BB			3/11/2012	101		91	
					BB			3/11/2012	101		91	
					BB			3/11/2012	101		91	
					GS			1/15/2012	108		GS-13 = 91	(in HRMIS 93, but no Q applicants lower)
					GS			2/12/2012	101		GS-13 = 83	
					GS			2/12/2012	101		GS-13 = 83	
					GS			2/12/2012	101		GS-13 = 83	All Q applicants were referred
					GS			3/11/2012	101		GS-11 = 91 GS-09 = 91 GS-07 = 100	NV - (b) (6) "Q" but not rating on GS-11, had 98 and 100 on the other two grades. GS-07 had a TP w/98.
					GS			3/11/2012	101		GS-14 = 91	Some Q applicants not rated?
					GS			3/25/2012	101		GS-13 = 90	TP veteran showed as NV on cert, another non veteran was selected?

FY 2012 - 2nd Quarter - Category Ranking Scores and Information

EmplID	Name	DeptI D	Position #	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)					GS	(b) (6)		1/6/2012	101	(b) (6)	GS-15 = 85	
					GS			2/12/2012	101		GS-12 = 96 GS-11 = 96	
					GS			3/25/2012	108		GS-12 = 91 GS-11 = 91 GS-09 = 91	
					GS			3/25/2012	108		GS-12 = 91 GS-11 = 91 GS-09 = 91	
					GS			1/1/2012	108		GS-11 = 98 GS-09 = 96	CPS Veteran hired
					GS			1/1/2012	108		GS-11 = 98 GS-09 = 96	CPS Veteran hired
					GS			1/29/2012	101		GS-11 = 91 GS-09 = 99	
					GS			1/15/2012	101		GS-11 = 91 GS-09 = 90	Need to verify if GS-09 cert was issued because in HRMIS it appears that there were CPS, CP & TP vets who should have been on the cert. (no selection from GS-09)
					BB			1/15/2012	101		91	
					GS			1/29/2012	501		GS-13 = 91	
					GS			1/29/2012	101		GS-09 = 91	
					GS			1/15/2012	101		GS-11 = 91	

FY 2012 - 2nd Quarter - Category Ranking Scores and Information

EmplID	Name	DeptI D	Position #	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)						(b) (6)				(b) (6)	GS-13 = 85	(GS-11 = in HRMIS 93, but no Q applicants lower)
					GS			1/29/2012	101		GS-12 = 83	
					GS			3/11/2012	108		GS-11 = 91	
					BB			3/11/2012	101		GS-12 = 85	
					BB			3/11/2012	101		91	
					BB			3/11/2012	101		91	
					BB			3/11/2012	101		91	
					GS			1/15/2012	108		GS-13 = 91	(in HRMIS 93, but no Q applicants lower)
					GS			2/12/2012	101		GS-13 = 83	
					GS			2/12/2012	101		GS-13 = 83	
					GS			2/12/2012	101		GS-13 = 83	All Q applicants were referred
											GS-11 = 91	NV - (b) (6) "Q" but not rating on GS-11, had 98 and 100 on the other two grades. GS-07 had a TP w/98.
					GS			3/11/2012	101		GS-09 = 91	
											GS-07 = 100	
					GS			3/11/2012	101		GS-14 = 91	Some Q applicants not rated?
					GS			3/25/2012	101		GS-13 = 90	TP veteran showed as NV on cert, another non veteran was selected?

FY 2012 - 1st Quarter - Category Ranking Scores and Information

EmplID	Name	DeptID	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)				GS	(b) (6)		10/9/2011	101	(b) (6)	GS-13 = 98	Only qualified applicant
				GS			10/23/2011	101		GS-13 = 100	Only qualified applicant
				GS			11/20/2011	101		GS-13 = 91	
				GS			10/9/2011	101		GS-12 = 93 GS-11 = 89	No Q candidates between 91-93 - follows SOP
				GS			10/9/2011	101		GS-12 = 93 GS-11 = 91	No Q candidates below 93 - follows SOP
				GS			11/6/2011	101		GS-14 = 91	Verify why CP vet (b) (6) wasn't on the cert. May have withdrew.
				GS			11/6/2011	101		GS-14 = 87	Only one NV applicant left off w/85. Didn't follow SOP.
				GS			10/23/2011	101		GS-13 = 87 GS-12 = 89 GS-11 = 91	GS-13: Only three qualified applicants - all referred. GS-12: Only two qualified applicants - all referred.
				GS			11/6/2011	101		GS-13 = 91	
				BB			11/20/2011	101		87	Had a TP w/83. Didn't follow SOP. No vets on certificate. Avoided the TP blocking the cert? If you stopped at 91 by the SOP it would not be a problem, but you went down further but not merged the entire category.
				GS			11/6/2011	101		99	Had 6 TP veterans between 91-97. Didn't follow SOP. TP vet was selected, but did those others miss consideration?
				GS			11/20/2011	101		"	"
				GS			12/18/2011	101		GS-13 = 99	Only two qualified candidates - both referred.

FY 2012 - 1st Quarter - Category Ranking Scores and Information

EmplID	Name	DeptID	Position Title	Pay Plan	Grade	Series	Eff Date	NOA Code	Job Opening	BQ Score Used	NOTES
(b) (6)				GS	(b) (6)		10/9/2011	108	(b) (6)	GS-13 = 91 GS-12 = 91	
				GS			12/4/2011	101		GS-12 = 100 GS-11 = 96 GS-09 = 97	GS-12: Would have 1 TP and 6 NV down to 91. CPS vet only referred. GS-11: Would have had 4 NV candidates down to 91. GS-09: Would have had 1 TP vet and 14 NV if went to 91. Didn't follow SOP
				GS			11/6/2011	108		GS-12 = 91 GS-11 = 91 GS-09 = 91	
				GS			10/9/2011	108		GS-12 = 96	vet and 1 NV on the certificate. Didn't follow SOP
				GS			12/4/2011	108		GS-13 = 89	HRMIS said 89 but then only those with 91 and above, and CPS/CP vets were on the certificate.

FY 2012 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected
(b) (6)			Veteran's preference and ICTAP information was in BPA only announcement.	3	NONE: use only necessary information in BPA announcements.	(b) (6)	
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Selection was made from an expired certificate	2	Document the certificate extension.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Min Qual Sheet not signed/dated - (b) (6)	3	Get the sheet signed.		
			No 5pt TP given to (b) (6) with dates 06/13/2010 to 12/26/2010 (196 days). Was NQ - didn't affect cert.	2	Correct veteran's preference on min qual sheet and throughout the system.		
			RNO data left on applicant(s): (b) (6)	2	Remove the RNO data sheets.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Merged the BQ and WQ categories when there were enough BQ candidates to make 2 selections. Both selectees were from the BQ group and so there were no illegal selections.	1	Follow regulations/directives to correct the situation.		
			SME's used sticky notes for each comment on rating sheets. These can easily come off. The notes need to be annotated on the actual sheet so they can't be lost or changed .	1	For now, tape the notes to the sheets in a way that they can't be removed/lost.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Didn't follow the SOP definitions for category rating. Didn't define the categories prior to announcement.	1	Follow regulations/directives to correct the situation.		
			On both GS-11 & GS-12 certificates there were NV applicants with ratings of 91-99 who were not referred, missed considerations.	1	Follow regulations/directives to correct the situation.		
			On GS-12 certificate, 5pt TP w/98 not referred. Missed consideration, possible illegal appointment of NV.	1	Follow regulations/directives to correct the situation.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.					

FY 2012 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected
(b) (6)			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.	(b) (6)	
			Didn't follow the SOP definitions for category rating. Didn't define the categories prior to announcement.	1	Follow regulations/directives to correct the situation.		
			BQ & WQ could be legitimately merged and that would have produced 15 apps for 6 positions. Therefore, (b) (6) w/79 should not have been referred/selected.	1	Follow regulations/directives to correct the situation.		
			BQ & WQ could be legitimately merged and that would have produced 15 apps for 4 positions. Therefore, (b) (6) w/79 should not have been referred/selected.	1	Follow regulations/directives to correct the situation.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			5pt TP given to (b) (6) with dates (b) (6) (no campaign badge). Was NQ - didn't affect cert.	2	Correct veteran's preference on min qual sheet and throughout the system.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			RNO data left on applicant(s): (b) (6)	2	Remove the RNO data sheets.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			No PD cover sheets in the casefile	3	Add the cover sheets to the PDs.		
			RNO data left on applicant(s): (b) (6)	2	Remove the RNO data sheets.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Returned certificate had no sticker to show it was audited upon return.	3	Audit the certificate and put the appropriate sticker to document.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.					

FY 2012 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected
(b) (6)			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.	(b) (6)	
			No copy of the USA jobs posting in the casefile.	2	Try to locate either a copy or a confirmation number and place in the file.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			No sources listed in Job Analysis - need to show SME/Mgr coordination	3	NONE: should document sources (especially SME/Mgr) for Job Analysis.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Didn't follow the SOP definitions for category rating. Didn't define the categories prior to announcement.	1	Follow regulations/directives to correct the situation.		
			Only two applicants referred - Two NV w/93 not referred. Only pref eligible declined and so the two missed valid consideration.	1	Follow regulations/directives to correct the situation.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			Returned certificate had no sticker to show it was audited upon return.	3	Audit the certificate and put the appropriate sticker to document.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		
			No PD cover sheet for GS-14 in the casefile	3	Add the cover sheets to the PDs.		
			Veteran's preference and ICTAP information was in BPA only announcement.	3	NONE: use only necessary information in BPA announcements.		
			Followed the SOP for category rating, however, the documentation wasn't included.	3	Add the documentation for category rating to the casefile.		
			No PD cover sheet in the casefile	3	Add the cover sheet to the PD.		
			Veteran's preference was adjudicated correctly, however, it was not entered into HRMIS and didn't show the two CP veterans on the Evaluation of Candidates sheet. Both were NQ so it didn't affect the certificate.	3	Should enter the preference status of all candidates into HRMIS and re-run the Evaluation of Candidates.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		

FY 2012 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected
(b) (6)			No Job Analysis in the casefile	3	Add the Job Analysis to the casefile.	(b) (6)	
			Veteran's preference and ICTAP information was in BPA only announcement.	3	NONE: use only necessary information in BPA announcements.		
			No justification for Selective Placement Factors	2	Need to add justification to the job analysis.		
			Well-Qualified not defined for ICTAP in BPA announcement - was on the USA jobs version	3	NONE: should include in all versions of DE announcements in the future.		

FY 2012 - 3rd Quarter - PAR and eOPF Issues and Trends

Employee	NHQ/NHO Employees	Complete List of Issues for each Casefile	NHQ Infraction Category	NHO Infraction Category	Corrective Action to be taken	Date Corrected
(b) (6)		Authority Code incorrect - not selected from DEU	2		Do a correction to the action	7/17/2012
		Authority Citation incorrect - not selected from DEU	2		Do a correction to the action	7/17/2012
		No copy of Military Orders (LWOP for military leave)		1	Get a copy into the eOPF	7/19/2012
		Authority Citation incorrect - cert # should be 9317-00	2		Do a correction to the action	7/23/2012
		Remark code for tenure has a major typo (060-03-2012)		3	Do a correction to the action	7/23/2012
		OF 306 signature illegible		2	rescan the document in eOPF	7/19/2012
		SF 61 has top portion missing		2	rescan the document in eOPF	7/19/2012
		Multiple copies of resume, min qual and rating sheets in eOP (one document)	1	1	remove the extra documents	7/17/2012
		Authority Citation incorrect - cert # should be 10060-00	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9712-00-A1	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9393-00A1	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9349-14	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9819-13	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9951-00	2		Do a correction to the action	7/19/2012
		No I-9 in the eOPF		1	Get a copy in the eOPF	7/19/2012
		Authority Citation incorrect - cert # should be 10060-00	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9394-00	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 10060-00	2		Do a correction to the action	7/19/2012
		No I-9 in the eOPF		1	Get a copy in the eOPF	7/23/2012
		No I-9 in the eOPF		1	Get a copy in the eOPF	7/19/2012
		OF 306 didn't scan correctly - messed up		2	rescan the document in eOPF	7/19/2012
		Authority Citation incorrect - cert # should be 9324-00A1	2		Do a correction to the action	7/19/2012
		No I-9 in the eOPF		1	Get a copy in the eOPF	7/19/2012

FY 2012 - 3rd Quarter - PAR and eOPF Issues and Trends

Employee	NHQ/NHO Employees	Complete List of Issues for each Casefile	NHQ Infraction Category	NHO Infraction Category	Corrective Action to be taken	Date Corrected
(b) (6)						
		Authority Citation incorrect - cert # should be 9616-00A1	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9616-00A1	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 10060-00	2		Do a correction to the action	7/20/2012
		Authority Citation incorrect - cert # should be 9950-00	2		Do a correction to the action	7/19/2012
		OF 306 signature illegible		2	rescan the document in eOPF	7/18/2012
		No PD in the library	2		Get a copy in the library	
		Authority Citation incorrect - cert # should be 9803-12	2		Do a correction to the action	7/20/2012
		Authority Citation incorrect - cert # should be 9616-00A1	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9693-13	2		Do a correction to the action	7/20/2012
		No resume in the eOPF		1	Get a copy in the eOPF	7/19/2012
		Authority Citation incorrect - cert # should be 10060-00	2		Do a correction to the action	7/19/2012
		No Accretion of Duties memo in the eOPF		1	Get a copy in the eOPF	7/20/2012
		Authority Citation incorrect - cert # should be 10060-00	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9616-00A1	2		Do a correction to the action	7/19/2012
		No resume in the eOPF		1	Get a copy in the eOPF	7/23/2012
		Authority Citation incorrect - cert # should be 9981-00	2		Do a correction to the action	7/19/2012
		Authority Citation incorrect - cert # should be 9394-00	2		Do a correction to the action	7/19/2012
		No vet pref given - dates of service 02/91 to 11/91		1	Do a correction to the action	7/19/2012

FY 2013 - 1st Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series / Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	Correction Made by (initials)	Notes
(b) (6)			Selection was made from an expired certificate	2	Document the certificate extension	(b) (6)	2/1/2013	JR good DLS	Annotated cert with extension date.
			No SME used on development of Job Analysis (PD was only source)	3	NONE: should document sources (especially SME/Mgr) for job analysis.		2/14/2013	email msg DLS	Notified RSA of this requirement. Hand wrote SME comment in the Job Analysis note field.
			After one selectee decline, the certificate was reissued with the old dates on it and included the person who declined. Was expired even before issuing.	2	Correct the second certificate to be a supplemental one with more current dates if possible. If not, annotate the actual issue/expire date on the certificate.		2/1/2013	rr	Cert is correct. Only issued a new cover sheet. Also annotated cert extended for another 60 days.
			The scores for WQ/Q not in HRMIS or on the reports and the location was wrong.	3	Put the scores into HRMIS, correct the location for the job and re-run the reports with correct data.		2/1/2013	rr	Corrected and run new evaluation candidates.
			Everyone in the system had "Q" and some with 0-20 points. Reports are all incorrect.	3	Put correct ratings and scores into HRMIS and re-run the reports with correct data.		2/1/2013	vlm / good DLS	Correct Ratings were in HRMIS, re-ran all 3 screening levels and printed new ADS and Candidate Eval. 02/04/13: 0-20 point HRMIS entry escalated to (b) (6) level for solution. 02/06/13: per (b) (6), waiting on TECH spt to assist with problem. 02/14/13: sent follow up e-mail for status.
			The min qual sheets were not all annotated with complete information when applicants who met the GS-9 level were "NQ" for the GS-10.	2	Complete all the minimum qualification sheets with reasons for any "NQ" ratings.		1/23/2013	rr	I completed the minimum qualification sheets with the reason not qualify.
			RNO data left on application: Shelton, Jill	2	Remove the RNO data		1/23/2013	rr	removed the RNO from the application
			There were HR documents for an employee attached to one of the applications.	2	NONE: Already removed during audit and returned to NHQ.		1/23/2013	rr	removed from the application
			No SME used on development of Job Analysis (PD was only source)	3	NONE: should document sources (especially SME/Mgr) for job analysis.		2/1/2013	vlm/BO / good DLS	RSA updated CP/JA to reflect SME - printed new copy ofr case file, and updated PD Library.
			Raters wrote notes on the applications.	2	Remove any notes if able and make sure in the future that panel members know not to write on applications.		2/1/2013	vlm / good DLS	Reviewed all applications for comments by raters and removed / erased notes as much as possible. Sent message to RSAs to remind managers/SMEs.
			No SME used on development of Job Analysis (PD was only source)	3	NONE: should document sources (especially SME/Mgr) for job analysis.		2/14/2013	email msg DLS	Notified RSA of this requirement. Hand wrote SME comment in the Job Analysis note field.
			Min qual sheet given to CPS (b) (6) and was marked that a VA letter was in the file, however, none was found Did not affect the certificate/selection.	3	Locate the VA letter or change the vet's preference on documents.		2/1/2013	JR good DLS	Placed (b) (6) VA letter in the case file. The VA letter was in the MP casefile.
			(b) (6) was marked as "NS" on GS-9 selected when he had actually declined.	2	Correct the certificate.		2/1/2013	JR good DLS	Corrected the GS-09 certificate to read "DD" vice "NS" for (b) (6)
			ICTAP Eligible was passed over for this selection (was on the GS-9 level).	1	Follow regulations/directives to correct the situation			/s/JSU	Identified another position for ICTAP candidate - we offered and she accepted. Working with Robin Henderson on 2/8/13 to resolve and fix cert. and correctly apply ICTAP Priority Placement.
			Disability form left on application: (b) (6)	2	Remove the Disability Form		2/6/2013	/s/JSU	RNO form removed from (b) (6) application.
			Non-Selects/Declinations not annotated on the certificates	2	Annotate the certificates correctly.		2/6/2013	/s/VLM	Cert. annotated correctly.
			Someone wrote on application: (b) (6)	2	Remove any notes if able and make sure in the future that panel members know not to write on applications.		2/6/2013	/s/VLM	Scribbles, scratches and marks removed from (b) (6) application.
			Raters wrote notes on the applications.	2	Remove any notes if able and make sure in the future that panel members know not to write on applications.		2/1/2013	JR good DLS	Reviewed all applications for comments by raters and removed / erased notes as much as possible. Sent message to RSAs to remind managers/SMEs.
			No annotation on min qual sheet for degree/date or license when they were a requirement.	3	Need to annotate the applicants met positive education requirement or licensing on the min quals sheet.		2/1/2013	JR good DLS	Annotated Min Qual sheets.

FY 2013 - 1st Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series / Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	Correction Made by (initials)	Notes
(b) (6)			There were no "BQ" candidates, 3 "WQ" candidates. They should have merged the categories and referred the 3 candidates. However, they sent all "Q" applicants (merging another category incorrectly). Selectee was in the "WQ" category so it didn't affect the selection.	2	Correct the certificates to show only the candidates who were merged from the "WQ" category.	(b) (6)	2/5/2013	JR good DLS	Categories were merged to form a BQ category. A total of 7 candidates were "WQ" and referred based off of the cut off scores of the Standardized Category Rating Scoring sheet used (June 28, 2012 to present).
			No annotation on min qual sheet for degree/date or license when they were a requirement.	3	Need to annotate the applicants met positive education requirement or licensing on the min quals sheet.		2/5/2013	JR good DLS	Annotated Min Qual sheets.

FY 2013 - 1st Quarter - PAR and eOPF Issues and Trends

Employee	NHQ/NHO Employees	Complete List of Issues for each Casefile	NHQ Infraction Category	NHO Infraction Category	Corrective Action to be taken	Date Corrected	Reviewed with HRA (initials)
(b) (6)		K12 remark had wrong cert # - should be 10312-13	2		Correct SF 50 remark	1/18/2013	rr
		K12 remark had wrong cert # - should be 10312-13	2		Correct SF 50 remark	1/18/2013	rr
		K12 remark had wrong cert # - should be 10312-13	2		Correct SF 50 remark	1/18/2013	rr
		K12 remark had wrong cert # - should be 10245-13	2		Correct SF 50 remark	1/18/2013	DLS 02/05/13
		K12 remark had wrong cert # - should be 10080-BL	2		Correct SF 50 remark	1/18/2013	/s/ AAG
		K12 remark had wrong cert # - should be 10214-BL-A1	2		Correct SF 50 remark	1/18/2013	/s/JSU
		No Tenure completion remark on SF 50.		2	Correct SF 50 remark	1/18/2013	N/A
		K12 remark had wrong cert # - should be 10134-00	2		Correct SF 50 remark	1/18/2013	/s/JSU
		K12 remark had wrong cert # - should be 10464-00	2		Correct SF 50 remark	1/18/2013	/s/JSU
		K12 remark had wrong cert # - should be 10143-00	2		Correct SF 50 remark	1/18/2013	/s/JSU
		K12 Remark left off. Should have cert #10151-09.	2		Correct SF 50 remark	1/18/2013	DLS 02/07/13
		K12 remark had wrong cert # - should be 10421-14	2		Correct SF 50 remark	1/18/2013	/s/ AAG
		DD214 or other documentation for 10% preference was not indexed correctly.		3	Reindex the documents so they are available.	1/18/2013	N/A
		Authority Citation incorrect - cert # should be 9867-14-R1	2		Correct Authority Citation	1/18/2013	rr
		K12 remark had wrong cert # - should be 10297-BL	2		Correct SF 50 remark	1/18/2013	/s/ AAG
		No official transcript in eOPF (required for qualification).		2	Locate official transcripts and scan into eOPF	1/18/2013	rr
		K12 remark had wrong cert # - should be 10291-DH	2		Correct SF 50 remark	1/18/2013	/s/ RV
		*Authority code should be AYM for direct hire authority	2		Correct SF 50 remark	1/18/2013	/s/ RV
		*No RPL annotation on the SF 50	2		Correct SF 50 remark	1/18/2013	/s/ RV

*Need NHO folks to verify this information for me.

FY 2013 - 2nd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Initials	Date Corrected	What was done	Coordinator initials
(b) (6)			Applicant is listed as a TP, however, he has a VA letter attached to show a 30% disability (CPS). Was well qualified and should have been on the certificate. Lost certification (b) (6). No illegal appointment as a TP was selected.	1	Will need to follow guidance to handle the missed consideration.	(b) (6)	RV	5/23/2013	Pending OPM response	RV
			Positive Education requirement not annotated on minimum qualification sheets.	3	Complete the minimum qualification sheets as appropriate.		rr	5/2/2013	completed and annotated min quals sheets.	rr
			HRA or Rater used highlighter on application (b) (6)	2	None - remind SMEs/Raters not to write on applications.		rr	5/2/2013	reminder completed	rr
			Original selection made from an expired certificate. After declination, the old cert was sent again (not reissued with new dates), which made that selection from an expired certificate.	2	None - remind RSA/HRA that when a supplemental certificate is issued it must have a new issue/expiration date. Put an explanation in the case file.		rr	5/2/2013	requested and completed (email from SO to reflect to the selection)	rr
			Certificate was annotated that the veteran declined the offer, it should have been "failed to respond"	2	Correct the designations on the certificates.		rr	5/2/2013	completed and annotated on the cert.	rr
			TP designation not entered into HRMIS, applicant didn't qualify so certification was not affected. (b) (6)	3	Update the system and documentation.		rr	5/3/2013	Corrected in HRMIS (TP) and new avaluation sheet completed	rr
			Positive Education requirement not annotated on minimum qualification sheets.	3	Complete the minimum qualification sheets as appropriate.		rr	5/2/2013	Correction pending – OPM auditors have case file	rr
			TP vet declined and certificate was just annotated instead of a new one issued. Same dates,so looks like it was expired before the selection was even made.	2	None - remind RSA/HRA that when a supplemental certificate is issued it must have a new issue/expiration date. Put an explanation in the case file.		JR	5/23/2013	RSA/HRA counseled regarding when a supplemental certificate is issued it must have a new issue/expiration date. HRA placed word document explanation in the case file.	RV
			RNO data left on application (b) (6)	2	Remove any RNO/medical info from the casefile.				Removed RNO data	RV
			No job analysis worksheet in the file.	3	Locate the job analysis and put it in the casefile.		rr	5/5/2013	Correction pending – OPM auditors have case file	rr

FY 2013 - 2nd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Initials	Date Corrected	What was done	Coordinator initials
(b) (6)			Rating sheet has two ratings but only one SME/Rater signed the forms (b) (6)	3	Get rating sheet signed by the other SME.	(b) (6)	rr	5/5/2013	Correction pending – OPM auditors have case file	rr
			Rating sheet has two ratings but only one SME/Rater signed the forms (b) (6)	3	Get rating sheets signed by the other SME.		rr	5/9/2013	rating sheets signed by (b) (6) and added to the case file	rr
			This person was selected from cert (b) (6) In AVUE, the certificate was under vacancy (b) (6). It was an error that the certificate was numbered with 200153 instead of 2(b) (6), however, since that is the way it was issued, then that is the way it should have stayed.	3	Verify the K12 remark is the actual certificate number. Refresh HRA/RSA on entering certificate numbers into AVUE and the process for the K12 or authority citation entry.		JM	5/16/2013	The K12 remark has been verified and a correction was request sent to NHO on 5/23/13. As far as Avue correction, per (b) (6) once the cert is issued this cant be fixed with out canceling and causing more issues.	RV

FY 2013 - 2nd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Initials	Date Corrected	What was done	Coordinator initials
(b) (6)			There is a memo attached to the position side which shows recruitment was initiated around a current BPA employee. Looks like a preselection and where an Accretion of Duties possibly should have been done instead.	1 or 3	Need to get further information on why this went out as a recruitment. If no further information, then it can be considered a #1 major infraction.	(b) (6)	RV	5/23/2013	(b) (6) worked with the manager and RSA regarding this recruitment and followed up on the impression of a pre selection. Upon further investigation (b) (6) found out that there was no pre selection and received a statement from the manager reflecting this information. (b) (6) also counseled RSA on 04/12/13 regarding types of information and documentation that is submitted into Avue.	RV
									(b) (6) uploaded documentation 8/6/13 into Avue.	

Employee	NHQ/NHO Employees	Complete List of Issues for each Casefile	NHQ Infraction Category	NHO Infraction Category	Corrective Action to be taken	Date Corrected
(b) (6)		K12 remark is wrong. Should read 200099-GS-13, dated 11/29/2012.	2		Correct SF 50 remark	Corrected 5/23/13
		External announcement but no RPL annotation to show it was cleared.	2		Correct SF 50 remark	Corrected 5/23/13
		K12 remark should read 200149-GS-11-PM	2		Correct SF 50 remark	Corrected 5/23/13
		Unofficial transcripts in eOPF, has a positive education requirement so official transcripts should have been required at offer.		2	Obtain a copy of official transcript for eOPF	Received transcripts and have uploaded them on 5/23/13
		K12 should read 200262-GS-14-PM, dated 02/07/13 (instead it reads 200062-GS-14-PM-020713-0819	2		Correct SF 50 remark	Corrected 03-05-3013
		SME/Rater wrote on application/resume	3		none - remind people to "not" mark up application/resumes	
		External announcement but no RPL annotation to show it was cleared.	2		Correct SF 50 remark	corrected 4/30/13
		K12 remark is incorrect. Was selected from 10465-VRA	2		Correct SF 50 remark	corrected 4/30/13
		Original authority citation was incorrect and has been on both of the extensions. Certificate was 8830-13 (not 8830-11-DE).	2		Correct authority citation back to the original	corrected 4/29/13
		SF 61 not scanned in correctly, signature portion missing.		3	rescan form	corrected
		Original action had the correct K12 remark, however, a correction was done that made it wrong.	2		Correct SF 50 remark	Corrected 5/23/13

* Original action was incorrect, therefore, these are the NHQ/NHO employees on that action.

** Original action was correct and then changed, these are the NHQ/NHO employees on the correction action.

FY 2013 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			NO ISSUES					101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct	(b) (6)	in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			Serious inconsistencies in the minimum qualification ratings. See Tab #3	1	Reconstruct case file.		in process	101
			Specialized experience was defined on Vacancy. However, the Specialized Experience screen out questions on the questionnaire do not appear justified by the vacancy definition, Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101
			(b) (6) - marked non-vet, was well qualified. Applicant entered the DD214 info and marked the button for CP status. Both DD214 and VA Ltr was attached to application. No illegal appointment because another veteran was chosen. However, applicant has a lost certification	1	During reconstruction, verify if applicant should be placed on a priority placement list.		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			Specialized experience was defined in the vacancy announcement, and there are specialized experience questions in the questionnaire(these screen applicants out of min quals). There isn't any direct correlation between the specialized experience questions and the specialized experience listed in the vacancy. These do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			There is a list of the "Screen Out Elements/KSAs" in the vacancy, along with the other KSA's/Elements. The screen out ones are not the technical KSAs, rather they are the soft ones (ie, problem solving, customer service). The KSAs are listed and marked whether or not they are used for screen out on the Job Analysis, however, there is no justification given.	1	Reconstruct case file.		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101

FY 2013 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			(b) (6) attached a DD214 and a VA Ltr for 60% preference, but no preference given because he didn't type in the info to the online DD214 and he didn't hit the radio button. Applicant was rated not qualified.	3	Nothing unless rated qualified during reconstruction	(b) (6)	in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			Specialized experience was defined in the vacancy announcement, and there are specialized experience questions in the questionnaire(these screen applicants out of min quals). There isn't any direct correlation between the specialized experience questions and the specialized experience listed in the vacancy. These do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			There is a list of the "Screen Out Elements/KSAs" in the vacancy, along with the other KSA's/Elements. The screen out ones are not the technical KSAs, rather they are the soft ones (ie, problem solving, customer service). The KSAs are listed and marked whether or not they are used for screen out on the Job Analysis, however, there is no justification given.	1	Reconstruct case file.		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101
			(b) (6) was marked as TP and was well-qualified. He entered the dates on the DD214 (b) (6) and there are no campaign badges. Should not have preference, but AVUE granted him TP. Doesn't affect the certificate or selection.	1	System issue - work with AVUE to correct		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			(b) (6)- marked TP and rated well-qualified. There is a VA Ltr showing he has CP preference. He filled in the DD214 portion of the application but failed to check the radio button on preference. Another veteran was selected so there was no illegal hire, but there was lost certification.	1	During reconstruction, verify if applicant should be placed on a priority placement list.		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			(b) (6) was marked as TP and was well-qualified. He entered the dates on the DD214 (b) (6) and there are no campaign badges. Should not have preference, but AVUE granted him TP. Doesn't affect the certificate or selection.	1	System issue - work with AVUE to correct		in process	101

FY 2013 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			Specialized experience was defined in the vacancy announcement, and there are specialized experience questions in the questionnaire(these screen applicants out of min quals). There isn't any direct correlation between the specialized experience questions and the specialized experience listed in the vacancy. These do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.	(b) (6)	in process	101
			(b) (6) was marked as TP and was well-qualified. He entered the dates on the DD214 (b) (6) and there are no campaign badges. Should not have preference, but AVUE granted him TP. Doesn't affect the certificate or selection.	1	System issue - work with AVUE to correct		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			Specialized experience was defined in the vacancy announcement, and there are specialized experience questions in the questionnaire(these screen applicants out of min quals). There isn't any direct correlation between the specialized experience questions and the specialized experience listed in the vacancy. These do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101
			(b) (6) - marked TP and rated well-qualified. There is an SF 50 and his DD214 showing he has CP preference. He filled in the DD214 portion of the application but failed to check the radio button on preference. Another veteran was selected from the DE certificate and a non-vet selected from the merit promotion certificate. So, there was no illegal hire, but there was lost consideration.	1	During reconstruction, verify if applicant should be placed on a priority placement list.		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	501
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	501

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Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.	(b) (6)	in process	501
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	501
			There is a list of the "Screen Out Elements/KSAs" in the vacancy, along with the other KSA's/Elements. The screen out ones are not the technical KSAs, rather they are the soft ones (ie, problem solving, customer service). The KSAs are listed and marked whether or not they are used for screen out on the Job Analysis, however, there is no justification given.	1	Reconstruct case file.		in process	501
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	501
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	501
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	System issue - work with AVUE to correct		in process	101
			Specialized experience was defined on Vacancy. However, the Specialized Experience screen out questions on the questionnaire do not appear justified by the vacancy definition, Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			The selection certificate had no number assigned.	3	Asking AVUE to please correct, the certificate number had been in the wrong place and didn't flow to the certificate.		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	501
			No appropriate job analysis prepared resulting in invalid assessment method.	1	System issue - work with AVUE to correct		in process	501
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	501
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	501
			The selection certificate had no number assigned.	3	Asking AVUE to please correct, the certificate number had been in the wrong place and didn't flow to the certificate.		in process	501
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	501

FY 2013 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct	(b) (6)	in process	501
			(b) (6) - is shown as a NV, however, he attached his DD214 which shows he served in the (b) (6) Was well-qualified, may have lost certification as they referred scores in the 80s.	1	During reconstruction, verify if applicant should be placed on a priority placement list.		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	703
			No appropriate job analysis prepared resulting in invalid assessment method.	1	System issue - work with AVUE to correct		in process	703
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	703
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	703
			The selection certificate had no number assigned.	3	Asking AVUE to please correct, the certificate number had been in the wrong place and didn't flow to the certificate.		in process	703
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	703
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	703
			Vacancy announcement uses federal jargon and is pretty much a copy of the Position Deescription duties and such.	3	NONE: in the future, use plain language for vacancies. This was open to only agency employees, however everyone could apply and be considered for non-competitive hiring authorities.		in process	703
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	130
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	130
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	130
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	130
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	130

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Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct	(b) (6)	in process	130
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	721
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	721
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	721
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	721
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	721
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	721
			(b) (6)- marked non-veteran. There is an SF 50 and his DD214 showing he has TP preference. He filled in the DD214 portion of the application. He was only rated qualified and therefore, it did not affect the certificate or selection.	1	During reconstruction, verify if applicant should be placed on a priority placement list.		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			Specialized experience was defined in the vacancy announcement, and there are specialized experience questions in the questionnaire(these screen applicants out of min quals). There isn't any direct correlation between the specialized experience questions and the specialized experience listed in the vacancy. These do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			The selection certificate had no number assigned.	3	Asking AVUE to please correct, the certificate number had been in the wrong place and didn't flow to the certificate.		in process	101
			There is a list of the "Screen Out Elements/KSAs" in the vacancy, along with the other KSA's/Elements. The screen out ones are not the technical KSAs, rather they are the soft ones (ie, problem solving, customer service). The KSAs are listed and marked whether or not they are used for screen out on the Job Analysis, however, there is no justification given.	1	Reconstruct case file.		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101

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Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			(b) attached a DD214, but no preference given because he didn't type in the info to the online DD214. No selection from DE cert, and applicant wasn't rated high enough for the certificate.	1	During reconstruction, verify if applicant should be placed on a priority placement list.	(b) (6)	in process	721
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	721
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	721
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	721
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	721
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	721
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	721
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	721
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	721
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	721
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	721
			The selection certificate had no number assigned.	3	Asking AVUE to please correct, the certificate number had been in the wrong place and didn't flow to the certificate.		in process	721
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	721
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	721
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	703
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	703
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	703
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	703
			The selection certificate had no number assigned.	3	Asking AVUE to please correct, the certificate number had been in the wrong place and didn't flow to the certificate.		in process	703
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	703

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Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct	(b) (6)	in process	703
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	702
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	702
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	702
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	702
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	702
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	702
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	101
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	101
			Specialized experience was defined in the vacancy announcement, and there are specialized experience questions in the questionnaire(these screen applicants out of min quals). There isn't any direct correlation between the specialized experience questions and the specialized experience listed in the vacancy. These do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	101
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	101
			There is a list of the "Screen Out Elements/KSAs" in the vacancy, along with the other KSA's/Elements. The screen out ones are not the technical KSAs, rather they are the soft ones (ie, problem solving, customer service). The KSAs are listed and marked whether or not they are used for screen out on the Job Analysis, however, there is no justification given.	1	Reconstruct case file.		in process	101
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	101

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Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct	(b) (6)	in process	101
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	702
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	702
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	702
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	702
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	702
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	702
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	500
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	500
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	500
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	500
			The selection certificate had no number assigned.	3	Asking AVUE to please correct, the certificate number had been in the wrong place and didn't flow to the certificate.		in process	500
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	500
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	500
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	702
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	702
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	702
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	702
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	702

FY 2013 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct	(b) (6)	in process	702
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	703
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	703
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	703
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	703
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	703
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	703
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	703
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	703
			Specialized experience not defined on Vacancy (just used the statement from the Qualification Standards). Specialized Experience screen out questions on the questionnaire do not appear justified by the Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	703
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	703
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	703
			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct		in process	703
			Manager's can see all applicants who make it past minimum qualifications, however, can only select from the Best Qualified list.	3	System issue - work with AVUE to correct		in process	703
			No appropriate job analysis prepared resulting in invalid assessment method.	1	Reconstruct case file.		in process	703
			Specialized experience was defined on Vacancy. However, the Specialized Experience screen out questions on the questionnaire do not appear justified by the vacancy definition, Job Analysis, Crediting Plan or Position Description.	1	Reconstruct case file.		in process	703
			The certificate doesn't contain the duty location.	3	System issue - work with AVUE to correct		in process	703
			There is no way for a SO to sign the electronic certificate.	3	System issue - work with AVUE to correct		in process	703

FY 2013 - 3rd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected	NOA
(b) (6)			There were two vacancy announcements posted. The one to USA Jobs had all the required items (except things such as veterans preference, CTAP/ICTAP items were just linked to other websites. The one posted on AVUE was a very brief announcement with many of the required items missing.	1	System issue - work with AVUE to correct	(b) (6)	in process	703

Employee	NHQ/NHO Employees	Complete List of Issues for each Casefile	NHQ Infraction Category	NHO Infraction Category	Corrective Action to be taken	Date Corrected	
(b) (6)		Authority/Authority Citation is incorrect, shows DEU selection instead of Merit Promotion	2		Correct the authority to show selection from merit promotion certificate.	in process	101
		There is no K12 remark.	3		* Use certificate name since the number wasn't entered: 200230-GS12PM-022113-1353	in process	101
		Part of the resume did not scan in correctly		2	Locate the resume and upload again	8/12/2013	130
		There is no K12 remark.	3		* Use certificate name since the number wasn't entered: 200230-GS12PM-022113-1353	in process	130
		Authority/Authority Citation is incorrect, shows DEU selection instead of Direct Hire	2		Correct the authority to show selection from merit promotion certificate.	in process	101
		There is no K12 remark.	3		* Use certificate name since the number wasn't entered: 200066-GS11DH-112912-1045	in process	101
		The resume has numerous black pages		2	Locate resume and upload again	8/12/2013	101
		K12 remark doesn't match in the last 4 numbers. Has 200522-GS15PM0607130757	3		Correct the K12 Remark: 200522-GS15PM-060613-0829	in proces	703
		K12 remark doesn't match in the last 4 numbers. Has 200205-PM 042313 1015	3		Correct the K12 Remark: 200205-PM 042313 1005	in process	101
		K12 remark doesn't match in the last 4 numbers. Has 200205-PM 042313 1015	3		Correct the K12 Remark: 200205-PM 042313 1005	in process	101
		K12 remark doesn't match in the last 4 numbers. Has 200205-PM 042313 1015	3		Correct the K12 Remark: 200205-PM 042313 1005	in process	101
		BUS code changed but no remark code to resume allotment		2	Add the remark code for allotment	8/12/2013	713
		Authority citation doesn't match in the last 4 numbers. Has 200059-GS13CR-121912-1922	2		Correct the citation: 200059-GS13CR-121912-1958	in process	101

Employee	NHQ/NHO Employees	Complete List of Issues for each Casefile	NHQ Infraction Category	NHO Infraction Category	Corrective Action to be taken	Date Corrected	
(b) (6)		RPL date no entered in remark code (shows mm/dd/yy)	1		Correct the date to:	in process	101
		Not all required onboarding documents are in eOPF (SF 144, SF61,VA letter for 30% pref)		2	Locate the documents and upload	8/12/2013	101
		No worksheet for differential documentation		1	Locate the document and upload	8/12/2013	810
		K12 remark doesn't match in the last 4 numbers. Has 200153-GS13PM-02212013-1744		3	Correct the K12 Remark: 200153-GS13PM-02212013	in process	130
		The VA Letter for 30% CPS is blank.		2	Locate letter and upload again	8/12/2013	101
		No RPL Remark		1	Correct to add the remark	in process	101
		No worksheet for differential documentation		1	Locate the document and upload	8/12/2013	810
		Not all required onboarding documents are in eOPF (DD214, VA letter for 30% preference)		2	Locate the document and upload	8/12/2013	101
		K12 remark doesn't match in the last 4 numbers. Has 200350-GS14PM031420131355		3	Correct the K12 Remark: 200350-GS14PM-03142013-1155	in process	702
		K12 remark doesn't match in the last 4 numbers. Has 200523-GS15PM0607130757		3	Correct the K12 Remark: 200523-GS15PM-060713-0753	in process	703
		Not all required onboarding documents are in eOPF (DD214, Official transcripts)		2	Locate the document and upload	8/12/2013	101
		Authority citation doesn't match in the last 4 numbers. Has 200153-GS13CR-01182013-17		3	Correct the K12 Remark: 200153 - GS-13 - CR - 01182013	in process	101
		Required onboarding documents not in eOPF (SF144, SF62, OF306,I-9, Resume)		2	Locate the document and upload	8/12/2013	703

FY 2013 - 3rd Quarter - PAR and eOPF Issues and Trends

Employee	NHQ/NHO Employees	Complete List of Issues for each Casefile	NHQ Infraction Category	NHO Infraction Category	Corrective Action to be taken	Date Corrected	
(b) (6)		Manual certificate had to be created due to error in AVUE. The K12 remark doesn't match the certificate number. It has 200275-GS11PM-02202013-2343	3		Correct the K12 Remark: 200275 GS-11	in process	702

Candidate's Name whose rating was overridden for consideration (b) (6)	GS-12	GS-11	GS-9	Vet Preference	Comments
	<p>11/18/12 15:46 Changed from being Best Qualified to not meeting minimum qualifications. Assigned assessment status of "Removed - Not Qualified" to (b) (6) for grade 12. Reason: Applicant does not have external experience that equals grade level GS-11 for qualifying at the GS-12</p>	<p>11/19/12 11:08 Changed from being Best Qualified to not meeting minimum qualifications. Reason provided was: Assigned assessment status of "Removed - Not Qualified" to (b) (6) for grade 11. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions</p>	<p>11/16/12 15:39 - Assigned assessment status of "Passed" to (b) (6) grade 09. Reason: BQ Verified</p>	CPS	<p>Selected at GS-9 level - I agree this applicant does not meet minimum qualifications at the GS-12 level; however I feel he does meet minimum quals at the GS-11 level. According to his application he has previously held a GS-9 position in HR for more than 1 year. In my opinion the intrpretation of the specialized experience as stated in the anounce was much too restrictive. Applicant received 5 emails from the Avue system. First one on 12-26-12 informing him he met minimum qualifications, but the email didn't inciate at what grade level(s). 3 emails were sent on 12-24-12 informing he he was found best qualified. None of the 3 emails indicatd at what grade levels. Since there were 3 emails, the assumption is the emails were for each grade level. It doesn't appear he was ever notified that his rating had been changed for the GS-11 and GS-12 grade levels. On 5/7/13 applicant received email from Avue system notifying him of selection at the GS-9 level.</p>
	NA	NA	<p>11/19/12 12:47 Changed from being Best Qualified to not meeting minimum qualification. Reason: Applicant disqualified for specialized experience requirement of in a Human Resources role, performing research and analysis of HR data, making recommendations, such as gathering data on staffing cycle times and time-to-hire to make recommendations for program improvements. Provided transactional staffing and recruitment information to applicants and managers, such as methods for submitting personnel action requests; promotion eligibility timeframes; or information on agency policy for vacancy announcement open periods. Participated in operational or planning meetings to discuss program or project milestones or activities. In a developmental capacity, assisted higher level HR professionals by classifying positions in such occupational fields as laborer, clerical, or assistant positions. Changed from being Best Qualified to not meeting minimum qualifications</p>	TP	
	Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	None	
	NA	Well Qualified Rating not changed at this grade	BQ Rating not changed at this grade	None	
	Well Qualified Rating not changed at this grade	Changed from being Best Qualified to not meeting minimum qualifications	BQ Rating not changed at this grade	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
	Changed from being Best Qualified to not meeting minimum qualifications	Best Qualified rating not changed at this grade level	Best Qualified rating not changed at this grade level	None	
	Well Qualified a this grade level	Well Qualified a this grade level	Changed from being Best Qualified to not meeting minimum qualifications	TP	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
	<p>11/18/12 15:21 Changed from being Best Qualified to not meeting minimum qualifications. Applicant is currently a GS-7 and has no higher graded external experience to qualify at the GS-12</p>	<p>11/19/12 10:00 Changed from being Best Qualified to not meeting minimum qualifications Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions</p>	<p>11/16/12 14:51 Changed from being Best Qualified to not meeting minimum qualifications. Applicant DISQUALIFIED or specialized experience requiring research and analysis of HR data to make recommendations for time to hire; providing information on how to submit personnel action request; classification of positions</p>	CP	
	Qualified for Consideration	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
	Well Quaified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
	Well Qualified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level

(b) (6)

Well Qualified	11/19/12 11:48 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions	11/19/2012 12:08 Changed from being Best Qualified to not meeting minimum qualifications. Applicant disqualified for specialized experience requirement of in a Human Resources role, performing research and analysis of HR data, making recommendations, such as gathering data on staffing cycle times and time-to-hire to make recommendations for program improvements. Provided transactional staffing and recruitment information to applicants and managers, such as methods for submitting personnel action requests; promotion eligibility timeframes; or information on agency policy for vacancy announcement open periods. Participated in operational or planning meetings to discuss program or project milestones or activities. In a developmental capacity, assisted higher level HR professionals by classifying positions in such occupational fields as laborer, clerical, or assistant positions.	TP	
NA	NA	Changed from being Best Qualified to not meeting minimum qualifications	None	
11/19/12 04:48 Changed from being Best Qualified to not meeting minimum qualifications. Applicant DISQUALIFIED or specialized experience requiring research and analysis of HR data to make recommendations for time to hire; providing information on how to submit personnel action request; classification of positions - does not have one year at the GS-11 grade level to qualify for the GS-12	11/19/12 09:50 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions.	Best Qualified	CPS	
Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Well Qualified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Qualified for Consideration	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	none	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	Best Qualified	None	
NA	NA	Changed from being Best Qualified to not meeting minimum qualifications	None	
11/18/12 15:32 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified does not have one year of specialized experience equal to the GS-11 grade level	11/19/12 10:00 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions	11/21/12 10:08 Changed from being Best Qualified to not meeting minimum qualifications. Applicant disqualified for specialized experience requirement of in a Human Resources role, performing research and analysis of HR data, making recommendations, such as gathering data on staffing cycle times and time-to-hire to make recommendations for program improvements. Provided transactional staffing and recruitment information to applicants and managers, such as methods for submitting personnel action requests; promotion eligibility timeframes; or information on agency policy for vacancy announcement open periods. Participated in operational or planning meetings to discuss program or project milestones or activities. In a developmental capacity, assisted higher level HR professionals by classifying positions in such occupational fields as laborer, clerical, or assistant positions.	CP	
Qualified for Consideration	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Qualified for Consideration	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Well Qualified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Changed from being Best Qualified to not meeting minimum qualifications	Well Qualified	Best Qualified	None	

(b) (6)

11/18/12 15:39 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant does not meet the one year specialized experience at the GS-11 grade level. No external experience, is currently a GS-8	11/19/12 09:52 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions	11/15/12 13:05 Reason: Applicant disqualified for not meeting one year specialized experience requirements - not classification, no research gathering data, trends or time-to-hire. Experience is all in the processing of actions Best Qualified.. 12/20/12 09:07 Assigned assessment status of "Passed". Reason: Per review of application by SME - qualified for GS-09	CPS	
Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	None	
Qualified for Consideration	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Changed from being Best Qualified to not meeting minimum qualifications	Best Qualified	Best Qualified	None	
Well Qualified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
Changed from being Best Qualified to not meeting minimum qualifications	Best Qualified	Best Qualified	None	
Well Qualified	11/19/12 11:54 Changed from being Best Qualified to not meeting minimum qualifications. Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions	11/19/12 12:09 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requirement of in a Human Resources role, performing research and analysis of HR data, making recommendations, such as gathering data on staffing cycle times and time-to-hire to make recommendations for program improvements. Provided transactional staffing and recruitment information to applicants and managers, such as methods for submitting personnel action requests; promotion eligibility timeframes; or information on agency policy for vacancy announcement open periods. Participated in operational or planning meetings to discuss program or project milestones or activities. In a developmental capacity, assisted higher level HR professionals by classifying positions in such occupational fields as laborer, clerical, or assistant positions.	TP	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
11/18/12 15:51 Changed from being Best Qualified to not meeting minimum qualifications Reason: Applicant's experience is EEO, and there is no external experience that meets the specialized experience requirements at the next lower grade level	11/19/12 09:53 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions	11/16/12 17:47 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant DISQUALIFIED or specialized experience requiring research and analysis of HR data to make recommendations for time to hire; providing information on how to submit personnel action request; classification of positions	CPS	
11/19/12 09:09 Changed from being Best Qualified to not meeting minimum qualifications Applicant DISQUALIFIED or specialized experience requiring one year of independently analyzing staffing and recruitment performance data across a wide range of organizational segments, developing proposals to restructure interrelated program areas	11/19/12 09:54 Changed from being Best Qualified to not meeting minimum qualifications Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions	Best Qualified	CPS	
Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	Changed from being Best Qualified to not meeting minimum qualifications	None	

<p>(b) (6)</p> <p>12/24/12 16:11 Changed from being Well Qualified to not meeting minimum qualifications. Reason: Experience providing advice and consultation to mgmt on well-established policies, such as specific positions, org design, position mgmt, or assignment of work issues. Do not see experience collaborating with mgmt or analyzing issues.</p>	<p>11/19/2012 11:39 Assignment Status of "Removed - Not Qualified. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions - Does not meet Time in Grade for Merit Promotion</p> <p>12/20/12 08:53 Assigned assessment status of "Passed" to (b) (6) for grade 11. Reason: Per review of application by SME - qualified for GS-11 Best Qualified</p>	<p>11/19/12 12:09 Assigned assessment status of "Passed" to (b) (6) or grade 09. Reason: BQ verified</p>	<p>TP</p>	
<p>11/19/12 09:29 Changed from being Best Qualified to not meeting minimum qualifications Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requiring collaborated with management to perform recruitment and placement functions for effective service delivery for an organization with difficult staffing problems, such as complicated organizational structures or rapid changes in technology or mission focus. Using well-developed consultative skills, provided advisory services on issues requiring policy interpretation, such as developing proposals to restructure interrelated program areas and/or providing recommendations on retention, performance enhancement, classification/ compensation, and economy and efficiency of operations issues. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Independently analyzed staffing and recruitment performance data across a wide range of organizational segments and prepared recommendations or presented findings, such as identifying trends and patterns in the quality and effectiveness of service delivery, to address changing business needs and improve competitiveness and effectiveness of the recruitment program.</p>	<p>11/19/12 09:54 Changed from being Best Qualified to not meeting minimum qualification. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions</p> <p>12/20/13 08:53 Assigned assessment status of "Passed" to (b) (6) law for grade 11. Reason: Per review of application by SME - qualified for GS-11 Best Qualified</p>	<p>11/15/12 11:49 Assigned assessment status of "Passed" to (b) (6) for grade 09. Reason: Qualified - based on education only Ultimately rated Best Qualified</p>	<p>CPS</p>	
<p>Well Quaiified</p>	<p>Well Qualified</p>	<p>Changed from being Best Qualified to not meeting minimum qualifications</p>	<p>None</p>	<p>Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level</p>
<p>11/18/12 15:25 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified - currently a GS-4 Intermittent with no higher graded level external experience to qualify for the GS-12</p>	<p>11/19/12 10:01 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions</p>	<p>11/16/12 15:15 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant DISQUALIFIED or specialized experience requiring research and analysis of HR data to make recommendations for time to hire; providing information on how to submit personnel action request; classification of positions</p>	<p>CP</p>	
<p>Changed from being Qualified to not meeting minimum qualifications</p>	<p>Changed from being Well Qualified to not meeting minimum qualifications</p>	<p>Changed from being Best Qualified to not meeting minimum qualifications</p>	<p>None</p>	
<p>NA</p>	<p>NA</p>	<p>Changed from being Best Qualified to not meeting minimum qualifications</p>	<p>None</p>	
<p>11/18/12 15:26 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified as does not one year of specialized experience at GS-11 grade level</p>	<p>11/19/12 10:00 Changed from being Best Qualified to not meeting minimum qualifications Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions</p>	<p>11/16/12 14:00 Assigned assessment status of "Passed" to (b) (6) for grade 09. Reason: BQ Verified</p>	<p>CP</p>	

(b) (6)	Changed from being Best Qualified to not meeting minimum qualifications	Best Qualified	Best Qualified	None	
	Well Qualified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	TP	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
	11/19/12 09:40 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requiring collaboration with management to perform recruitment and placement functions for effective service delivery for an organization with difficult staffing problems, such as complicated organizational structures or rapid changes in technology or mission focus. Using well-developed consultative skills, provided advisory services on issues requiring policy interpretation, such as developing proposals to restructure interrelated program areas and/or providing recommendations on retention, performance enhancement, classification/ compensation, and economy and efficiency of operations issues. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Independently analyzed staffing and recruitment performance data across a wide range of organizational segments and prepared recommendations or presented findings, such as identifying trends and patterns in the quality and effectiveness of service delivery, to address changing business needs and improve competitiveness and effectiveness of the recruitment program.	11/19/12 09:57 Changed from being Best Qualified to not meeting minimum qualifications. Reason: Applicant disqualified for specialized experience requirement advising and counseling management on well-precedented staffing policies, such as advising on recruitment sources, recruitment approaches, and advertising timeframes, or impact of reduction-in-force procedures. Provided advice and consultation to management on well-established policies, such as advising on specific positions, organization design, position management, classification/compensation, or assignment of work issues. Reviewed and discussed agency or organizational HR policies and guidelines with higher-grade specialists. Used problem solving skills to identify problems and causation factors and generate solutions and/or offered recommendations for a variety of staffing, recruitment, or classification/compensation problems for a complex organizational environment. Communicated effectively with individuals or groups in formal or informal settings, expressing and/or presenting a variety of staffing, recruitment, and classification information (e.g., factual, technical, sensitive, etc.) to influence management decisions 12/20/12 08:54 Assigned assessment status of "Passed" to (b) (6) for grade 11. Reason: Per review of application by SME - qualified for GS-11. Ultimately found to be Best Qualified	11/16/12 18:13 Reason: Applicant DISQUALIFIED or specialized experience requiring research and analysis of HR data to make recommendations for time to hire; providing information on how to submit personnel action request; classification of positions- lacks one year 11/21/12 10:02 Assigned assessment status of "Passed" to (b) (6) or grade 09. Reason: BQ Verified - (change in assessment status due to incorrect box marked due to columns not lining up). Ultimately found to be Best Qualified	CPS	
	Well Qualified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
	Well Qualified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	None	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
	Well Qualified	Changed from being Well Qualified to not meeting minimum qualifications	Best Qualified	None	
	Well Qualified	Well Qualified	Changed from being Best Qualified to not meeting minimum qualifications	TP	Determined to meet basic qualifications at the higher grade(s), but not at the GS-9 level
	11/18/12 at 15:54 Assigned assessment status of "Removed - Not Qualified" to (b) (6) for grade 12. Reason: Applicant does not have external experience that equals grade level GS-11 for qualifying at the GS-12.				
	12/03/12 11:21 Assigned assessment status of "Passed" to (b) (6) for grade 12. Reason: Additional review determined that applicant does not meet Time In Grade for MP, but does have external specialized experience qualifying for the external GS-12 (vm) 3/8/13 15:51 status was changed to Selected	11/18/12 11:54 -Assigned assessment status of "Removed - Not Qualified" to (b) (6) n for grade 12. Reason: Applicant does not have one year of specialized experience at the next lower grade level. No external experience qualifying for GS-12. 11/19/12 09:58 Assigned assessment status of "Passed" to (b) (6) for grade 11. Reason: BQ verified	11/16/12 17:58 -Assigned assessment status of "Passed" to (b) (6) for grade 09. Reason: BQ Verified		Selected for GS-12 position

Competitive Certificates Issued - August 2010 through June 2012

Recruitment Type	Job Opening #	VA Number	RSA Name	RSA #	Job Opening Status	DeptID	Posting Title	Pay Plan	Occ Series	Grade
Open Competition	(b) (6)				110-Filled/Closed	(b) (6)		GS	(b) (6)	
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			BB		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					080-Ready to Hire			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition					110-Filled/Closed			BB		
Open Competition					080-Ready to Hire			BB		
Open Competition					080-Ready to Hire			BB		
Open Competition					110-Filled/Closed			BB		

Competitive Certificates Issued - August 2010 through June 2012

Recruitment Type	Job Opening #	VA Number	RSA Name	RSA #	Job Opening Status	DeptID	Posting Title	Pay Plan	Occ Series	Grade
	(b) (6)					(b) (6)			(b) (6)	
Open Competition					080-Ready to Hire			BB		
Open Competition					080-Ready to Hire			BB		
Open Competition					080-Ready to Hire			BB		
Open Competition					080-Ready to Hire			BB		
Open Competition										
Open Competition					090-Re-opened			GS		
Open Competition					110-Filled/Closed			GS		
Open Competition										
Open Competition					110-Filled/Closed			GS		

Competive Certificates Issued - August 2010 through June 2012

Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES	Makeup of Cert	What would Cert be if SOP followed
(b) (6)		99	N	0	(b) (6)		TP	One NV at 93 (did they miss consideration?), there were 2 vets on the cert and one was selected.	1-CP, 1-TP, 1-NV	1-CP, 1-TP, 3-NV
		100	N	96			CP	There were 26 NV at 91-99, however there were 2 vets at the top of the list and 5 NV with 100. Selection OK even though SOP not followed.	CPS, CP, 5-NV	CPS, CP, 31-NV
		93	N	0			NV	One NV at 91 (did they miss consideration?), all three referred applicants were NV, also.	3-NV	6-NV
		93	N	0			NV	One NV at 91 (did they miss consideration?), all three referred applicants were NV, also.	3-NV	4-NV
		96	N	81			NV	1 TP at 93 not referred (missed consideration by SOP), eleven NV between 91-95.	7-NV	1 TP, 18 NV
		96	N	81			NV	5 NV from 91-95 didn't get referred (missed consideration?) May be able to justify since 8 NV were referred.	8-NV	13-NV
		94	Y	81			TP	One TP at 96 was on list but sent a letter saying he wasn't qualified? One NV at 92 (missed consideration?)	2-TP, 9-NV	2-TP, 10-NV
		94	Y	81			NV	Same case file as (b) (6) - above	"	"
		99	N	0			NV	9 applicants referred, 10 NV at 91-98 (missed consideration?)	9-NV	19-NV
		100	N	0			NV	One TP at 93, 13 NV with 91-99. TP missed consideration by the SOP	9-NV	1-TP, 22-NV
		100	N	0			NV	Same case file as (b) (6) - above	"	"
		98	N	94			NV	Three NV with 91-97 (missed consideration?)	4-NV	7-NV
		98	N	94			NV	Same case file as (b) (6) - above	"	"
		100	N	0			NV	19 NV referred at 100, 1 TP with 96 and 30 NV at 91-99. TP missed consideration by the SOP	19-NV	1-TP, 49-NV
		91	N	81			NV	TP with 94 NS (passover or withdrawal?) GET THE CASEFILE	1-TP, 8-NV	SAME

Competive Certificates Issued - August 2010 through June 2012

Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES	Makeup of Cert	What would Cert be if SOP followed
(b) (6)		94	Y	81	(b) (6)		CP	3 TP at 91-93 not referred (missed consideration?) GET THE CASEFILE	3-CP, 2-TP, 3-NV	3-CP, 5-TP, 3-NV
		96	Y	0			NV	One TP at 93, 5 NV with 91-93. TP missed consideration by the SOP	8-NV	1-TP, 13-NV
		91	Y	0			NV	One TP at 95 not selected (passover or withdrawn?) GET THE CASEFILE	1-TP, 5-NV	SAME
		91	Y	0			NV	Same case file as July - above	"	"
		91	Y	81			NV	CPS vet not selected (passover or withdrawn?) GET THE CASEFILE	1-CPS, 9-NV	SAME
		99	Y	0			TP	6 TP with 91-98 (missed consideration?)	3-CPS, 1-CP, 3-TP	3-CPS, 1-CP, 9-TP, 15-NV
		99	Y	0			TP	Same case file as (b) (6) - above	"	"
		96	Y	0			NV	4 NV with 91-95 not referred (missed consideration?) CPS withdrew, TP was selected for another vacancy prior to this selection.	1-CPS, 1-TP, 2-NV	1-CPS, 1-TP, 6-NV
		87	Y	81			NV	Should have stopped at 91 but went to 87 and didn't merge the entire category. If they had merged the entire category then there would have been a TP and a NV with 83.	5-NV	3-NV
		97	Y	0			NV	Had a TP with 94 and 14 NV with 91-96 (missed consideration?)	6-NV	1-TP, 20-NV
		96	Y	91			NV	TP with 91 (missed consideration?)	4-NV	1-TP, 4-NV
		100	Y	0			NV	1 TP with 98 and 4 NV with 91-99 (missed consideration?)	6-NV	1-TP, 10-NV
		89	Y	0			NV	Should not have merged (selectee was in top category).	4-NV	7-NV
		79	Y	70			NV	Merged all the way down to part of 3rd category for only 4 positions. Should have stopped with 2 categories*. 1 selectee would not have been within reach.	1-TP, 16-NV	*11-NV
		79	Y	70			TP	Same case file as (b) (6) - above	"	"
		79	Y	70			NV	Same case file as (b) (6) - above	"	"
		79	Y	70			NV	Same case file as (b) (6) - above	"	"

Competive Certificates Issued - August 2010 through June 2012

Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES	Makeup of Cert	What would Cert be if SOP followed
(b) (6)					(b) (6)			Merged all the way down to part of 3rd category for only 4 positions. Should have stopped with 2 categories*. 2 selectees would not have been within reach	1-TP, 16-NV	*11-NV
		79	Y	70			NV			
		79	Y	70			NV	Same case file as (b) (6) - above	"	"
		79	Y	70			NV	Same case file as (b) (6) - above	"	"
		79	Y	70			NV	Same case file as (b) (6) - above	"	"
		90	Y	0			NV	Only 2 "Q" applicants, all referred. TP with 90 not selected (passover or withdrawal?) TP hired from cert issued later - verify all remedies were taken.	1-TP, 1-NV	SAME
		90	Y	0			TP	(see (b) (6) remarks)	"	"
		100	Y	0			NV	2 NV with 93 not referred (missed consideration?) - TP veteran withdrew, leaving only one candidate.	1-TP, 1-NV	1-TP, 3-NV

Competitive Certificates Issued - August 2010 through June 2012

Recruitment Type	Job Opening #	VA Number	RSA Name	RSA #	Job Opening Status	DeptID	Posting Title	Pay Plan	Occ Series
	(b) (6)					(b) (6)			(b) (6)
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			BB	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	

Competitive Certificates Issued - August 2010 through June 2012

Recruitment Type	Job Opening #	VA Number	RSA Name	RSA #	Job Opening Status	DeptID	Posting Title	Pay Plan	Occ Series
Open Competition	(b) (6)				110-Filled/Closed	(b) (6)		GS	(b) (6)
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			BB	
Open Competition					110-Filled/Closed			BB	
Open Competition					080-Ready to Hire			BB	
Open Competition					080-Ready to Hire			BB	
Open Competition					080-Ready to Hire			BB	
Open Competition					080-Ready to Hire			BB	
Open Competition					080-Ready to Hire			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					080-Ready to Hire			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					080-Ready to Hire			BB	
Open Competition					110-Filled/Closed			BB	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					080-Ready to Hire			GS	
Open Competition					080-Ready to Hire			GS	
Open Competition					080-Ready to Hire			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					110-Filled/Closed			GS	
Open Competition					080-Ready to Hire			GS	
Open Competition					080-Ready to Hire			GS	
Open Competition					080-Ready to Hire			BB	

Competitive Certificates Issued - August 2010 through June 2012

Recruitment Type	Job Opening #	VA Number	RSA Name	RSA #	Job Opening Status	DeptID	Posting Title	Pay Plan	Occ Series
	(b) (6)					(b) (6)			(b) (6)
Open Competition					080-Ready to Hire			BB	
Open Competition					010-Open			GS	
Open Competition					010-Open			GS	
Open Competition					110-Filled/Closed			GS	

Competitive Certificates Issued - August 2010 through June 2012

Grade	Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES
(b) (6)			91	N	0	(b) (6)		NV	OK per SOP
			91	N	0			TP	OK per SOP
			91	N	0			TP	OK per SOP
			93	N	0			NV	No one at 91 or 92. OK per SOP
			84	N	0			TP	Merged ok because there were less than 2 applicants above 91. Used 84, however, there was no one at 81-83. OK per SOP
			84	N	0			TP	Merged ok because there were less than 2 applicants above 91. Used 84, however, there was no one at 81-83. OK per SOP
			85	N	75			TP	Report shows cutoff at 85, however, certificate looks like 91. Selection was correct with TP
			87	N	0			NV	Only two "Q" applicants, both referred, OK per SOP
			93	N	0			TP	No applicants from 91-92, OK per SOP
			93	N	0			NV	No applicants from 91-92, OK per SOP
			91	N	0			NV	OK per SOP
			91	N	0			NV	OK per SOP
			93	N	81			NV	Only two "Q" applicants, one NV had only 70, OK per SOP
			83	N	0			NV	Only two "Q" applicants at 91 or above, merged all remaining "Q" applicants. OK per SOP
			100	N	0			NV	Only one "Q" applicant, OK per SOP

Competitive Certificates Issued - August 2010 through June 2012

Grade	Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES
(b) (6)						(b) (6)			
			89	N	81			NV	HRMIS says used 89, however, certificate used 91. Only one "Q" applicant above 91. The other applicant was a TP w/85. OK per SOP
			100	N	81			XP	One NV at 98, no other "Q" applicants. OK per SOP
			91	N	81			NV	OK per SOP
			91	N	0			NV	OK per SOP
			85	N	0			NV	No applicants from 81-84, only one applicant above 91 so merged. OK per SOP
			101	N	0			TP	Scores were actually 96-98 (w/o Vet points), only other "Q" applicant was 86. OK per SOP
			93	N	0			NV	Only one "Q" applicant, OK per SOP
			85	N	0				All "Q" applicants referred, OK per SOP
			91	N	88			NV	OK per SOP
			91	N	81			NV	OK per SOP
			90	N	0			NV	Only two "Q" applicants, both referred, OK per SOP
			90	N	81			NV	Only four "Q" applicants, all referred, OK per SOP
			85	N	0			CP	Only applicant, Direct Hire (not DEU)
			91	N	81			CP	OK per SOP
			85	N	0			NV	Only 3 "Q" applicants, all referred. OK per SOP
			91	N	81			NV	OK per SOP

Competitive Certificates Issued - August 2010 through June 2012

Grade	Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES
(b) (6)			81	N	0	(b) (6)		NV	All "Q" applicants referred, OK per SOP
			81	N	0			NV	All "Q" applicants referred, OK per SOP
			81	N	0			NV	All "Q" applicants referred, OK per SOP
			91	N	0			NV	OK per SOP
			91	N	81			NV	OK per SOP
			91	N	81			NV	OK per SOP
			81	Y	71			NV	Only four "Q" applicants, all referred, OK per SOP (Excepted Appt anyway)
			94	Y	0			NV	TP and CP not selected OK per SOP (Excepted Appt anyway)
			91	N	81			NV	OK per SOP
			91	N	81			NV	OK per SOP
			91	N	81			TP	OK per SOP
			91	N	81			NV	OK per SOP
			91	N	0			CPS	OK per SOP
			89	N	0			NV	Only one "Q" applicant, OK per SOP
			91	Y	81			NV	OK per SOP
			91	Y	81			NV	OK per SOP
			0	Y	0			NV	Only one "Q" applicant, OK per SOP
			91	Y	81			TP	OK per SOP
			91	Y	0			NV	OK per SOP
			91	N	0			NV	OK per SOP
			91	N	0			NV	OK per SOP
			85	Y	0			NV	Only one "Q" applicant, OK per SOP
			91	Y	0			NV	OK per SOP
			91	Y	81			NV	OK per SOP
			0	Y	0			NV	OK per SOP

Competitive Certificates Issued - August 2010 through June 2012

Grade	Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES
(b) (6)			0	N	0	(b) (6)		NV	All "Q" applicants referred, OK per SOP
			98	Y	0			NV	Only one "Q" applicant, OK per SOP
			91	Y	0			TP	OK per SOP
			91	Y	0			TP	OK per SOP
			91	Y	0			NV	OK per SOP
			91	Y	0			NV	OK per SOP
			91	Y	0			NV	OK per SOP
			93	Y	0			NV	Used 93, however, there are no applicants with 91-92, OK per SOP
			93	Y	0			TP	Used 93, however, there are no applicants with 91-92, OK per SOP
			93	Y	0			TP	Used 93, however, there are no applicants with 91-92, OK per SOP
			91	Y	81			NV	OK per SOP
			0	N	0			NV	Excepted Appt - OK
			99	Y	0			NV	Only 2 "Q" applicants, all referred. OK per SOP
			91	Y	0			TP	OK per SOP
			91	Y	0			NV	OK per SOP
			100	Y	0			NV	OK per SOP - DH not DE
			93	Y	0			NV	Only 2 "Q" applicants, all referred. OK per SOP
			96	Y	0			CPS	OK per SOP
			89	Y	81			CP	HRMIS says used 89, however, certificate used 91. OK per SOP
			87	Y	81			CPS	No applicants from 81-86, only 2 applicants above 91. OK per SOP
			96	Y	81			CPS	No applicants from 91-95, OK per SOP
			100	Y	0			NV	Only one "Q" applicant, OK per SOP
			4	N	0			NV	OK per SOP - DH not DE

Competitive Certificates Issued - August 2010 through June 2012

Grade	Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES
(b) (6)			85	Y	0	(b) (6)		NV	Only 2 "Q" applicants, all referred. OK per SOP
			91	Y	81			NV	OK per SOP
			70	Y	0			NV	2 TP not selected both were picked on other certificates.
			70	Y	0			TP	OK per SOP
			91	Y	81			TP	OK per SOP
			0	Y	0			NV	Excepted Appt - OK
			91	Y	81			NV	OK per SOP
			93	Y	0			NV	Only 2 "Q" applicants, all referred. OK per SOP
			91	Y	81			NV	OK per SOP
			91	Y	81			NV	OK per SOP
			85	Y	0			NV	Only 2 "Q" applicants, all referred. OK per SOP
			85	Y	80			NV	OK per SOP
			70	Y	0			CP	OK per SOP
			86	Y	81			NV	OK per SOP
			86	Y	81			TP	OK per SOP
			91	Y	83			TP	OK per SOP
			91	Y	83			NV	OK per SOP
			91	Y	83			NV	OK per SOP
			100	Y	0			NV	OK per SOP - DH not DE
			100	Y	0			NV	OK per SOP - DH not DE
			93	Y	0			NV	No applicants with 91-92, OK per SOP
			83	N	0			NV	No applicants with 81-82, OK per SOP
			83	N	0			NV	No applicants with 81-82, OK per SOP
			83	N	0			NV	No applicants with 81-82, OK per SOP
			91	Y	81			NV	OK per SOP
			85	Y	0			TP	OK per SOP - DH not DE

Competitive Certificates Issued - August 2010 through June 2012

Grade	Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES
(b) (6)			91	Y	0	(b) (6)		NV	OK per SOP
			91	Y	81			TP	OK per SOP
			79	Y	70			NV	OK per SOP
			79	Y	70			NV	OK per SOP
			85	Y	81			NV	OK per SOP
			76	Y	71			CPS	OK per SOP
			85	Y	81			NV	OK per SOP
			85	Y	81			NV	OK per SOP
			85	Y	0			NV	CPS vet not selected, however selected from another vacancy, OK per SOP
			91	Y	81			NV	OK per SOP
			98	Y	0			NV	No "Q" appl with 91-97, OK per SOP
			91	Y	0			NV	OK per SOP
			91	Y	83			TP	OK per SOP
			70	Y	0			NV	OK per SOP
			91	Y	81			TP	OK per SOP
			100	N	0			NV	OK per SOP - DH not DE
			100	N	0			NV	OK per SOP - DH not DE
			91	Y	0			NV	OK per SOP
			93	Y	0			NV	No applicants with 91-92, OK per SOP
			91	Y	81			NV	OK per SOP
			4	N	0			NV	OK per SOP - DH not DE
			74	N	0			NV	OK per SOP - DH not DE
			79	N	0			TP	OK per SOP - DH not DE
			95	Y	0			NV	No applicants with 91-94, OK per SOP
			90	Y	0			NV	OK per SOP
			85	Y	81			NV	No applicants with 81-84, OK per SOP
			70	Y	0			NV	OK per SOP

Competitive Certificates Issued - August 2010 through June 2012

Grade	Job Code	Certificate Issue Date	Best Qual Score	Cat Rating Used	Well Qual Score	Hired	Hired EmplID#	Vet's Code	NOTES/ISSUES
(b) (6)			70	Y	0	(b) (6)		TP	OK per SOP
			81	Y	0			NV	All "Q" applicants referred, OK per SOP
			81	Y	0			NV	All "Q" applicants referred, OK per SOP
			94	N	0			TP	17 NV from 91-94 didn't get referred (missed consideration?) Probably OK since TP was selected and it was an Attorney job.

Category Rating Best Qualified Category Score Review.

Prepared by Dave Shaut, 7/9/12

Summary:

After reviewing the 69 certificates that represent the 84 hires that are most likely to be affected by a more conservative application of Delegated Examining procedures, 13 appointments were highlighted as warranting additional review because the appointment could be illegal. In these cases, changing the best qualified category score excluded a candidate with veteran's preference. Overall, 141 compliant selections were made using category rating procedures.

What prompted the review of Category Rating files from FY 11 to present?

In May concerns were raised that BPA's Category Rating practices were in conflict with established Federal wide-guidance. When the Federal-wide Hiring Improvement Executive Order was implemented at BPA we established a practice of changing the best qualified category score (BQ Score) when business conditions warranted. Criteria for changing the BQ Score included size of referral list, number of anticipated selections, selecting official's capacity to do interviews. Any change to the score was supposed to follow applicable veteran's hiring laws and competitive selection principles. A more conservative reading of the Delegated Examining Operations Handbook is that this score can only be changed before the announcement opens, and not after candidates have been rated.

Review Methodology

The HRMIS Business Analyst provided a report of all certificates that have been produced in HRMIS since November 2010. Using this report the certificates were separated into review groups based on the consequences of mis-applied Category Rating procedures. Certificates used to make hires where the BQ Score was not equal to 91 were the first review groups to be identified.

This report summarizes the results after reviewing review groups 1 and 2. } }

13 selections
(11 certificates)

Review Groups	No. of Selections	No. of Certs
1. Annual, BQ score > 91, selection(s) made	38	33
2. Annual, BQ score < 91, selection(s) made	26	22
3. Hourly, BQ ≠ 91, selection(s) made	20	14
4. Annual & Hourly, BQ score ≠ 91, no selection	0	176
5. BQ = 91, selection(s) made; SES; direct hire*	70	158
Totals	154	403

*direct hire selections do not follow category rating procedures

Dave Shaut and Kathi Grim reviewed the hardcopy files in review groups 1 and 2. We were unable to locate a small number of files, and for these cases reprinted documentation from HRMIS.

This analysis was done using a conservative view of the DEOH Category Rating instructions. In this view there is no flexibility to change the Best Qualified category score after the announcements has opened and the candidates received scores. This review should inform BPA's continued use of this understanding of Category Rating, as well as begin the process of determining of corrective action needs to be taken in a limited number of cases where erroneous hires may have been made.

When certificates of eligibles are created in HRMIS the Talent Acquisition staff enters a BQ Score. This score, and whether a selection was made from each certificate were the main criterion used to determine which files to review first.

What follows is a summary of Groups 1 & 2, which have the highest consequences if Delegated Examining rules were incorrectly applied. In these cases the corrective actions can include notifying candidates with veteran's preference of the mistake and offering priority consideration for equivalent positions.

Findings

After completing the review of groups 1 and 2 we found that the certificates fell into five categories:

- Effective BQ score of 91
- Retroactive Merge
- Errant Consideration
- Lost Consideration
- Erroneous Hire/Illegal Appointment

	Selections	Certificates
Groups 1 & 2 Totals	64	56
Effective BQ Score of 91	22	21
Retroactive Merge	18	15
Errant Consideration	2	2
Lost Consideration	11	9
Erroneous Hire	13	11

ERRONEOUS HIRE

	Selections	Certificates
Groups 1 & 2 Totals	64	56
Effective BQ Score of 91	22	21
Retroactive Merge	18	15
Errant Consideration	2	2
Lost Consideration	11	9
Erroneous Hire	13	11

Certificates in the "Erroneous Hire" category had candidates who were entitled to veteran's preference who scored between 91 and a newly established BQ score. In these cases veterans were not selected. Talent Acquisition's practice has been to modify the Best Qualified score in an attempt to supply the selecting official with an adequate supply of candidates. In some cases there were too many candidates (10+) for a selecting official to interview, or, there were not enough vacancies to be filled to warrant referring a large number of candidates.

I will attach the case summaries, Evaluation of Candidates Reports, Certificates, and justifications (if in file) for the files that may have Erroneous Hires. Here are the links to the specific case summaries:

Corrective action—if HCM decides that the practice of changing BQ Scores after candidates were rated was unsupportable, then these candidates will need to be given priority consideration for these positions as they are readvertised, or offered equivalent positions in the agency. NHI has prepared a table called "Correcting Common DEU Errors," which has explanations of the correction options.

All the case summaries are saved in Sharepoint. Here is the link to Sharepoint site with case file summaries and spreadsheet.

[http://internal.bpa.gov/orgs/ibs/HCM/nhq-talent acquisition/Category Rating Review/Forms/AllItems.aspx](http://internal.bpa.gov/orgs/ibs/HCM/nhq-talent%20acquisition/Category%20Rating%20Review/Forms/AllItems.aspx)

Susan, Ellen, Dave Clark, Roy and Kathi have access to these docs.

LOST CONSIDERATION

	Selections	Certificates
Groups 1 & 2 Totals	64	56
Effective BQ Score of 91	22	21
Retroactive Merge	18	15
Errant Consideration	2	2
Lost Consideration	11	9
Erroneous Hire	13	11

The "Lost Consideration" category consists of certificates where the BQ score was raised and there were candidates who scored between 91 and the newly established BQ score. The candidates from case files in this category that were not referred do not have veteran's preference. This is significant because it means that they are not entitled to priority consideration.

To be eligible for priority consideration four conditions must have been present in the file, and constitute a legal violation.

Conditions for a legal violation

In order for there to be a legal violation, all four conditions must be met:

1. A selection must be made from the erroneous certificate;
2. When the erroneous certification is corrected, the misranked eligible must move within reach of selection;
3. When the erroneous certification is corrected, the selectee must move out of selection range; and
4. The misranked eligible must meet all the qualification requirements for the job.

These are not legal violations because all four conditions were not met; specifically, the selectee is still within reach after the erroneous certification is corrected. In all cases the selectee had a higher score than the candidates that lost consideration.

(DEOH pg 170, [http://www.opm.gov/deu/handbook 2007/deo handbook.pdf](http://www.opm.gov/deu/handbook%202007/deo%20handbook.pdf))

Corrective action--since there has been no legal violation, there is no obligation on the part of the selecting official or the examining office to give the eligible any priority consideration. The file should be updated to reference the finding of lost certification, but no further action is required. (DEOH pg 173, [http://www.opm.gov/deu/handbook 2007/deo handbook.pdf](http://www.opm.gov/deu/handbook%202007/deo%20handbook.pdf))

ALL DE REVIEWS - ERRONEOUS APPOINTMENTS AND CORRECTIVE ACTION REPORT - 6/12/13

PART 1 - CORRECTIVE ACTION REQUIRED

PART 1 - CORRECTIVE ACTION REQUIRED					Corrective Action*				
CASE FILE NUMBER	JOB OPEN #	TITLE	HIRED	VET CODE	SOURCE & FINDINGS # erroneous appt. # lost empl. cons. # lost certif.	PRIORITY CONSIDERATION (Lost Employment Consideration)	PRIORITY CONSIDERATION (Lost Certification, not DEOH Required)	REGULARIZE ERRONEOUS APPOINTMENT	STATUS OF CORRECTIVE ACTION
(b) (6)				NV	BPA 1 erroneous appt. 4 lost empl. cons	(b) (6)		REQUIRED: Request variation for (b) (6)	
				NV	BPA and OPM 1 erroneous appt. 1 lost empl. cons 11 lost certif.			REQUIRED: Request variation for (b) (6)	
				TP NV	BPA 2 erroneous appt. 2 lost empl cons (1 person) 6 lost certif.			REQUIRED: Request variation for both: (b) (6)	
				NV	BPA 1 erroneous appt. 1 lost empl cons. 11 lost certif.			NONE REQUIRED: (b) (6) separated from BPA (b) (6)	
				NV NV	BPA 2 erroneous appt. 2 lost empl cons. (1 person) 13 lost certif.			REQUIRED: Request variation for both: (b) (6)	
				NV	BPA, DOE and OPM 1 erroneous appt. 1 lost empl. cons 30 lost certif.			REQUIRED: Request variation for (b) (6)	
				NV	DOE and OPM 1 erroneous appt. 1 lost empl. cons 0 lost certif.			NONE REQUIRED: (b) (6) separated from BPA (b) (6)	
				NV	BPA and DOE 1 erroneous appt. 1 lost empl. cons 5 lost certif.			NONE REQUIRED: (b) (6) separated from BPA (b) (6)	
				NV	DOE Illegal appt.				<i>Need to reconstruct</i>

ALL DE REVIEWS - ERRONEOUS APPOINTMENTS AND CORRECTIVE ACTION REPORT - 6/12/13

PART 1 - CORRECTIVE ACTION REQUIRED

PART 1 - CORRECTIVE ACTION REQUIRED					Corrective Action*					
CASE FILE NUMBER	JOB OPEN #	TITLE	HIRED	VET CODE	SOURCE & FINDINGS # erroneous appt. # lost empl. cons. # lost certif.	PRIORITY CONSIDERATION (Lost Employment Consideration)	PRIORITY CONSIDERATION (Lost Certification, not DEOH Required)	REGULARIZE ERRONEOUS APPOINTMENT	STATUS OF CORRECTIVE ACTION	
(b) (6)					NV	BPA and DOE 1 erroneous appt. 1 lost empl. cons 14 lost certif.	(b) (6)		REQUIRED: Request variation for (b) (6)	
					NV	BPA, DOE and OPM 1 erroneous appt. 1 lost empl. cons 0 lost certif.			REQUIRED: Request variation for (b) (6)	(b) (6) hired as Account Specialist GS-1101-12
					NV	DOE and OPM 1 erroneous appt. 1 lost empl. Cons 0 lost certif.			REQUIRED: Request variation for (b) (6)	Request sent to DOE to hire (b) (6) for Business Specialist GS-1101-12.
					NV	BPA 1 erroneous appt. 1 lost empl. cons 4 lost certif.			REQUIRED: Request variation for (b) (6)	
					NV	DOE and OPM 1 erroneous appt.			REQUIRED: Request variation for (b) (6)	
					TP NV	BPA 2 erroneous appts. 7 lost empl. cons. 0 lost certif.			REQUIRED: Request variation for both: (b) (6)	(b) (6) hired as (b) (6)
					NV	BPA and DOE 1 erroneous appt that has been regularized by hiring Ronald Huff who lost employment consideration.			REQUIRED: Requested variation for (b) (6) on December 7, 2012	(b) (6) as IT Specialist GS-2210-13

ALL DE REVIEWS - ERRONEOUS APPOINTMENTS AND CORRECTIVE ACTION REPORT - 6/12/13

PART 1 - CORRECTIVE ACTION REQUIRED

PART 1 - CORRECTIVE ACTION REQUIRED					Corrective Action*					
CASE FILE NUMBER	JOB OPEN #	TITLE	HIRED	VET CODE	SOURCE & FINDINGS # erroneous appt. # lost empl. cons. # lost certif.	PRIORITY CONSIDERATION (Lost Employment Consideration)	PRIORITY CONSIDERATION (Lost Certification, not DEOH Required)	REGULARIZE ERRONEOUS APPOINTMENT	STATUS OF CORRECTIVE ACTION	
(b) (6)					NV	DOE and OPM	(b) (6)		REQUIRED: Request variation for both: (b) (6)	
					NV	2 erroneous appts. 2 lost empl. cons (1 person) 0 lost certif.			REQUIRED: Requested variation for (b) (6) December 7, 2012	
(b) (6)					NV	BPA and OPM	(b) (6)		REQUIRED: Requested variation for (b) (6) December 7, 2012	
					TP	1 erroneous appt that has been regularized by hiring Brian Otto who lost employment consideration.				

*BPA used predefined Best Qualified (BQ) score range of 91 - 100

ALL DE REVIEWS - ERRONEOUS APPOINTMENTS AND CORRECTIVE ACTION REPORT - 6/12/13

PART 2 - PENDING DETERMINATION FOR REQUIRED ACTION

PART 2 - PENDING DETERMINATION FOR REQUIRED ACTION					Corrective Action*					
CASE FILE NUMBER	JOB OPEN #	TITLE	HIRED	VET CODE	FINDINGS # erroneous appt. # lost empl. cons. # lost certif.	PRIORITY CONSIDERATION (Lost Employment Consideration)	PRIORITY CONSIDERATION (Lost Certification)	REGULARIZE ERRONEOUS APPOINTMENT	STATUS OF CORRECTIVE ACTION	
(b) (6)						TP vets-bypassed	NONE REQUIRED: no selection made		NONE REQUIRED: no selection made	Received-DOE-notification (6/7/13 e-mail from Tiffany Wheeler) no action required since no selection made.
					NV NV	0 erroneous appt. 0 lost empl. cons. 6 lost certif. (3 people twice)	NONE REQUIRED		NONE REQUIRED	
					CPS	0 erroneous appt. 0 lost empl. cons. 4 lost certif.	NONE REQUIRED		NONE REQUIRED	
					TP	Illegal appt. 1 lost certification of a CP vet.	NONE REQUIRED: BPA verified that selectee is TP vet. Need to provide DOE selectee's application, DD 214 and certificate from which selected.		NONE REQUIRED: BPA verified that selectee is TP vet. Need to provide DOE selectee's application, DD 214 and certificate from which selected.	
					TP TP	0 erroneous appt. 0 lost empl. cons. 21 lost certif.	NONE REQUIRED		NONE REQUIRED	
					NV	0 erroneous appt. 0 lost empl. cons. 4 lost certif.	NONE REQUIRED		NONE REQUIRED	
					NV	Potential TP vet pref errors	NONE REQUIRED: based on 5/2/13 review		NONE REQUIRED	

ALL DE REVIEWS - ERRONEOUS APPOINTMENTS AND CORRECTIVE ACTION REPORT - 6/12/13

PART 2 - PENDING DETERMINATION FOR REQUIRED ACTION

PART 2 - PENDING DETERMINATION FOR REQUIRED ACTION					Corrective Action*					
CASE FILE NUMBER	JOB OPEN #	TITLE	HIRED	VET CODE	FINDINGS # erroneous appt. # lost empl. cons. # lost certif.	PRIORITY CONSIDERATION (Lost Employment Consideration)	PRIORITY CONSIDERATION (Lost Certification)	REGULARIZE ERRONEOUS APPOINTMENT	STATUS OF CORRECTIVE ACTION	
(b) (6)					NV	Illegal appt.	NONE REQUIRED: BPA review found appointment to be correct upon reconstruction. Original certificate with changed (lowered) cutoff score resulted in inappropriate merge. Selectee scored 91 or up. DOE will review.		NONE REQUIRED	Received DOE notification (6/7/13 e-mail from Tiffany Wheeler) that corrective action required since once a certificate (category) merged and selection made, cannot "unmerge" the category even when reconstructing. Case moved to Part 1 - Required Action.
					CPS CPS	Some vets impacted, but CPS vet hired.	NONE REQUIRED: 1 TP vet found not qualified and therefore not referred on GS-9 certificate. No selection made from GS-12 certificate therefore no missed consideration for the TP vet.		NONE REQUIRED: 1 TP vet found not qualified and therefore not referred on GS-9 certificate. No selection made from GS-12 certificate therefore no missed consideration for the TP vet.	
					NV	0 erroneous appt. 0 lost empl cons 2 lost certif.	NONE REQUIRED		NONE REQUIRED	
						Illegal appt	NONE REQUIRED: no selection made		NONE REQUIRED: no selection made	

*BPA used predefined Best Qualified (BQ) score range of 91 - 100

PART 1 - CORRECTIVE ACTION REQUIRED						Corrective Action	
CASE FILE NUMBER	JOB OPEN #	TITLE	HIRED	FINDINGS	CANDIDATE(S) IMPACTED	REGULARIZE ERRONEOUS APPOINTMENT	STATUS OF CORRECTIVE ACTION
10292-12		Secretary GS-318-7	Lequeta Colford	Erroneous appointment resulting from improper application of Interagency Career Transition Assistance Program (ICTAP) selection priority	Jeannette Kelso - ICTAP candidate	REQUIRED: request variation for Lequeta Colford	Hired Jeannette Kelso for HR Specialist GS-201-9. Sent request for variation to DOE.



Department of Energy

Official File

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

FREEDOM OF INFORMATION ACT/PRIVACY PROGRAM

July 11, 2014

In reply refer to: D-B1

Dan Seligman
Columbia Research Corporation
PO Box 99249
Seattle, WA 98139

FOIA #BPA-2013-01448-F

Dear Mr. Seligman:

This is the final response to your request for records that you made to the Bonneville Power Administration (BPA), under the Freedom of Information Act, 5 U.S.C. 552.

You requested the following:

1. The final Human Capital Management Accountability Program ("HCMAP" audit reports of 2007 and 2010, and the preliminary results of 2013.
2. "All other audits and investigation reports since October 1, 2009 related to the operation of BPA's Human Capital Management office. The term "audit" includes internal audits conducted by BPA staff...and BPA contractors (e.g., AVUE Technologies)."

BPA has released two partial responses to your request; one on October 30, 2013, and the second on April 18, 2014.

Response:

BPA is releasing the remaining five audit reports (111 pages): thirty-four pages with certain information redacted under Exemption 6 (5 U.S.C. § 552(b)(6)) of the FOIA.

Exemption 6

Exemption 6 is generally referred to as the "personal privacy" exemption (5 U.S.C. § 552(b)(6)). This exemption protects information in personnel, medical, and similar files when disclosure would constitute a clearly unwarranted invasion of personal privacy. The records at issue here are from investigation, personnel and legal advice files, which are "similar files." Therefore, these records are appropriate for analysis under Exemption 6.

To determine whether any information must be withheld under Exemption 6, an agency must: (1) identify whether the individual has a significant privacy interest in the information; (2) identify whether release would further the public interest by shedding light on the operations and activities of the government; and (3) weigh the identified privacy interests in the information against the public interest in disclosure. If the privacy interest outweighs the public interest in disclosure, releasing the information would constitute a clearly unwarranted invasion of privacy.

The information withheld under Exemption 6 consists of names of individuals that applied for positions at BPA as well as other information that would tend to disclose the identity of these individuals. Releasing the information could subject the individual(s) to unwarranted or unsolicited communications and does not shed any light on operations or activities of the government.

Since no public interest would be served by disclosing this information, and since there is a viable privacy interest that would be threatened by such disclosure, Exemption 6 authorizes withholding the information. Therefore, we have determined that the public interest in the information's release does not outweigh the overriding privacy interests in keeping it confidential. Information withheld under Exemption 6 cannot be considered for discretionary disclosure.

Pursuant to Department of Energy FOIA regulations at 10 C.F.R. § 1004.8, you may administratively appeal this response in writing within 30 calendar days. If you choose to appeal, please include the following:

- (1) The nature of your appeal - denial of records, partial denial of records, adequacy of search, or denial of fee waiver;
- (2) Any legal authorities relied upon to support the appeal; and
- (3) A copy of the determination letter.

Clearly mark both your letter and envelope with the words "FOIA Appeal," and direct it to the following address:

Director, Office of Hearings and Appeals:
Department of Energy
1000 Independence Avenue SW
Washington DC 20585-1615

If you have any questions or concerns about this letter, please contact Kim Winn, Government Information Specialist (FOIA), at 503-230-5273.

Sincerely,

/s/Christina J. Munro

Christina J. Munro
Freedom of Information Act/Privacy Act Officer

Enclosure: Responsive documents

From: Wentworth,Julia J (BPA) - NHI-1
Sent: Tuesday, April 23, 2013 4:41 PM
To: Fox,Roy B (BPA) - NH-1; Clark,David C (BPA) - NHI-1; O'Leary,Launie A (BPA) - NHQ-1; Henderson,Robin Y (BPA) - NHO-1
Cc: Wachal,Ellen E (BPA) - NHQ-1; Cockrum Jr,Mitchell A (BPA) - NHQ-1; Parent,Melissa L (BPA) - NHO-1; Harrison,Krista E (BPA) - NHO-1; Mantei,Charles T (BPA) - NHI-1
Subject: Audit FY 13 Q2 Results Memo

All:

Attached please find the FY 13 Q2 audit along with our report card YTD. We are currently discussing whether to proceed with our meeting tomorrow or whether we will need to postpone it to free up key players to work on responses to our OPM audit. Will let you all know tomorrow.

Summary:

- There were 25 total infractions, down from an average of 84 in FY 12.
- There were 24 infractions per 100 items audited, down from an average of nearly 70 infractions per 100 items audited in FY 12.
- There was one category one infraction.

Category 1:

The auditor identified a case where a veteran incorrectly self reported his veterans status but his DD214 supported CP veteran status. There was no illegal appointment since we hired another veteran. Historically it has not been our practice to review attachments for all qualified applicants. However, because the applicant submitted a DD214, I retained the auditor's characterization of category 1. We will need to evaluate our practice in this area.

Other:

There was one other finding in which the justification for a Merit Promotion action appeared to indicate pre-selection. This was characterized as either category 3 or category 1 depending upon whether the email justification was in fact an accurate representation of the action. Mitch had investigated this matter prior to the audit and found the manager email mischaracterized the situation. Mitch obtained additional documentation from the next level manager validating an appropriate position justification and selection activities following. Therefore, I assigned category 3 to this item. We will need to add the additional documentation to the case file.

Trends:

We had five issues with the K12 notation. Typically this occurs when the certificate number in Avue does not match what is in the SF-50. As part of our Q1 closeout, NHQ and NHO partnered to streamline the nomenclature convention in Avue, which we anticipated would resolve the issue. We need to investigate whether these were legacy issues from before that change or whether the change itself did not resolve the systematic problem.

Meeting:

We will discuss the audit results and our plan of action.



Microsoft Word document

Microsoft Word document

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JJ Wentworth

Bonneville Power Administration
HCM | NHI Integrated Strategy and Policy
(503) 230-4756

Audit Report Card: Infraction Trends

Quarterly Audits Types of Infractions Trends (5 or more instances within a quarter)	FY 2012				FY 2013			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Expired Certificates	11	10	1	4	2			
No Job Analysis	10	6	1	0	0	1		
No SME/Manager Coordination on Job Analysis/Crediting Plan	(not measured)	12	1	5	3			
Min Qual and/or Rating Sheets Not Complete or Not Consistant	11	5	2	6	3			
Unused Certificates Not Documented	7	5	0	1	0			
RNO Data (and medical items) Not Removed	4	8	3	0	2	1		
Veteran Preference Incorrect (not affecting certificate)	1	5	2	2	0			
PAR Actions Approved After Effective Date	9	20	2	0	0			
Category Rating (documentation missing, merge incorrectly)			16	1	1			
Authority Citation incorrect (or K12 Remark citation)			23	14	13	5		
Actions taken to prevent infractions:	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Process Improvement - process change	X	X	X	X	X			
Develop Standard Operating Procedures	X			X	X			
Process mapped out	X				X			
Communication to team on audit results	X	X	X	X	X			

FY 2013 - 2nd Quarter - List of Infractions and Trends (NHQ)

Case file Number	Job Title	Series/Grade	Complete List of Issues for each Case file	Infraction Category	Corrective Action to be taken	NHQ Employees	Date Corrected
(b) (6)			Applicant is listed as a TP, however, he has a VA letter attached to show a 30% disability (CPS). Was well qualified and should have been on the certificate. Missed consideration (b) (6). No illegal appointment as a TP was selected.	1	Will need to follow guidance to handle the missed consideration.	(b) (6)	
			Positive Education requirement not annotated on minimum qualification sheets.	3	Complete the minimum qualification sheets as appropriate.		
			HRA or Rater used highlighter on application (b) (6)	2	None - remind SMEs/Raters not to write on applications.		
			Original selection made from an expired certificate. After declination, the old cert was sent again (not reissued with new dates), which made that selection from an expired certificate.	2	None - remind RSA/HRA that when a supplemental certificate is issued it must have a new issue/expiration date. Put an explanation in the case file.		
			Certificate was annotated that the veteran declined the offer, it should have been "failed to respond"	2	Correct the designations on the certificates.		
			TP designation not entered into HRMIS, applicant didn't qualify so certification was not affected (b) (6)	3	Update the system and documentation.		
			Positive Education requirement not annotated on minimum qualification sheets.	3	Complete the minimum qualification sheets as appropriate.		
			TP vet declined and certificate was just annotated instead of a new one issued. Same dates, so looks like it was expired before the selection was even made	2	None - remind RSA/HRA that when a supplemental certificate is issued it must have a new issue/expiration date. Put an explanation in the case file.		
			RNO data left on application (b) (6)	2	Remove any RNO/medical info from the casefile.		
			No job analysis worksheet in the file.	3	Locate the job analysis and put it in the casefile.		
			Rating sheet has two ratings but only one SME/Rater signed the forms (b) (6)	3	Get rating sheet signed by the other SME.		
			Rating sheet has two ratings but only one SME/Rater signed the forms (b) (6) (b) (6)	3	Get rating sheets signed by the other SME.		
			This person was selected from cert #200153 - GS-09 - PM - 01042013. In AVUE, the certificate was under vacancy #200109. It was an error that the certificate was numbered with 200153 instead of 200109, however, since that is the way it was issued, then that is the way it should have stayed.	3	Verify the K12 remark is the actual certificate number. Refresh HRA/RSA on entering certificate numbers into AVUE and the process for the K12 or authority citation entry.		
			There is a memo attached to the position side which shows recruitment was initiated around a current BPA employee. Looks like a preselection and where an Accretion of Duties possibly should have been done instead.	1 or 3	Need to get further information on why this went out as a recruitment. If no further information, then it can be considered a #1 major infraction.		

**CATEGORY RATING REVIEW
SELECTION RESULTS 10/1/2010 THRU 6/21/2012**

1. SELECTIONS:

Total # selections		159
a) Total # selections for reviewed case files (case files where score for BQ and other categories were changed from the predefined score)	89	
b) Total # selections where case files were not reviewed (case files where the predefined score for BQ and other categories did not change)	70	
a) Total # selections where cutoff score moved up or down	67	
b) Total # selections where cutoff score did not move (includes when BQ score is <i>effectively</i> 91)	92	

2. TOTALS FOR ERRONEOUS CERTIFICATION AND REMEDY (From data in section 3):

Type of Erroneous Certification*	Total #		Remedy
	Vet	NV	
Erroneous Appointment	2	11	Will need to consult with DOE to fashion a remedy.
Lost Employment Consideration	11	23	Will need to consult with DOE to fashion a remedy. DEOH says eligibles <i>may</i> be offered an identical or equivalent job or <i>must</i> be given priority consideration.
Lost Certification	11	154	The DEOH does not require action for this situation. However, DOE communicated to BPA to offer the eligible priority consideration to avoid a prohibited personnel practice (fair and open competition).

***Description for Type of Erroneous Certification:**

1. Erroneous Appointment – an appointment without a proper authority or legal basis. For example, a non-veteran is erroneously appointed because a veteran was incorrectly left off the selection certificate. Another example would be if a veteran is appointed but should not have appeared on the selection certificate because quality categories were inappropriately merged.
2. Lost Employment Consideration – the more serious type of erroneous certification involving violation of law (e.g., Title 5 of the United States Code and the Veterans' Preference Act of 1944.) For example, if a veteran is incorrectly left off a selection certificate and a non-veteran is appointed resulting in an erroneous appointment, then the veteran has lost employment consideration. In order for there to be a legal violation, **all** four conditions must be met:
 - a) A selection must be made from the erroneous certificate;
 - b) When the erroneous certification is corrected, the misranked eligible must move within reach of selection;
 - c) When the erroneous certification is corrected, the selectee must move out of selection range; and
 - d) The misranked eligible must meet all the qualification requirements for the job.
3. Lost Certification – occurs when an eligible is misranked on or left off a certificate but correcting the error would not give the eligible real employment consideration. For example, an eligible was left off a certificate but would not have been within reach for selection, even if he/she had received proper treatment, because a veteran on the certificate would have absolute selection preference for category rating.

**CATEGORY RATING REVIEW
SELECTION RESULTS 10/1/2010 THRU 6/21/2012**

3. DATA FOR CASE FILES WHERE CUTOFF SCORE MOVED UP OR DOWN (excluding where BQ score is *effectively* 91):

Case File #	Job Open # And Score Change (↑ or ↓)	# Candidates on Certificate			# Candidates who missed cutoff			Erroneous Certification					
								# Erroneous Appointments		# Lost Employment Consideration		# Lost Certification	
		Vet	NV	Total	Vet	NV	Total	Vet	NV	Vet	NV	Vet	NV
(b) (6)		4	1	5	0	0	0	0	0	0	0	0	0
		2	7	9	0	23	23	0	0	0	0	0	23
		0	7	7	1	11	12	0	1	1	0	0	11
		0	5	5	0	0	0	0	0	0	0	0	0
		0	8	8	0	5	5	0	0	0	0	0	5
		1	6	7	0	1	1	0	0	0	0	0	1
		0	4	4	0	0	0	0	0	0	0	0	0
		0	6	6	0	0	0	0	0	0	0	0	0
		0	4	4	1	6	7	0	1	1	0	0	6
		2	36	38	0	0	0	1	0	1	0	0	10
		0	9	9	1	10	11	0	1	1	0	0	10
		0	2	2	0	0	0	0	0	0	0	0	0
		0	4	4	0	0	0	0	0	0	0	0	0
		0	9	9	1	13	14	0	2	2 ²	0	0	13
		0	4	4	0	3	3	0	0	0	0	0	3
		0	19	19	1	30	31	0	1	1	0	0	30
		0	3	3	0	0	0	0	0	0	0	0	0
		0	11	11	0	0	0	0	0	0	0	0	0
		0	1	1	0	0	0	0	0	0	0	0	0
		0	3	3	0	0	0	0	0	0	0	0	0
		5	3	8	3	0	3	0	0	0	0	3	0
		0	8	8	1	5	6	0	1	1	0	0	5
		7	0	7	8	13	21	0	0	0	0	8	13
		2	2	4	0	4	4	0	0	0	0	0	4
		0	5	5	0	0	0	0	0	0	0	0	0
		0	6	6	1	14	15	0	1	1	0	0	14

¹ The 2nd entry for this Job Open # is to address action on the supplemental certificate issued to fill additional vacancies.

² One veteran lost 2 employment considerations since 2 positions were filled.

³ One veteran not identified as having veteran's preference at the time the certificate was issued had a 99 score and should have been referred on the certificate regardless of the change in cutoff score.

**CATEGORY RATING REVIEW
SELECTION RESULTS 10/1/2010 THRU 6/21/2012**

Case File #	Job Open # And Score Change (↑ or ↓)	# Candidates on Certificate			# Candidates who missed cutoff			Erroneous Certification					
								# Erroneous Appointments		# Lost Employment Consideration		# Lost Certification	
		Vet	NV	Total	Vet	NV	Total	Vet	NV	Vet	NV	Vet	NV
(b) (6)		0	4	4	1	0	1	0	1	1	0	0	0
(b) (6)		0	2	2	0	0	0	0	0	0	0	0	0
(b) (6)		2	4	6	0	0	0	0	0	0	0	0	0
(b) (6)		3	4	7	0	0	0	0	0	0	0	0	0
(b) (6)		0	2	2	0	0	0	0	0	0	0	0	0
(b) (6)		0	4	4	0	0	0	0	0	0	0	0	0
(b) (6)		3	3	6	0	0	0	0	0	0	0	0	0
(b) (6)		1	5	6	0	0	0	0	0	0	0	0	0
(b) (6)		0	6	6	1	4	5	0	1	1	0	0	4
(b) (6)		0	4	4	0	0	0	0	0	0	0	0	0
(b) (6)		0	3	3	0	0	0	0	0	0	0	0	0
(b) (6)		0	5	5	0	0	0	0	0	0	0	0	0
(b) (6)		1	16	17	0	0	0	1	0	0	12	0	0
(b) (6)		1	16	17	0	0	0	0	1	0	11	0	0
(b) (6)		0	2	2	0	0	0	0	0	0	0	0	0
(b) (6)		1	2	3	0	0	0	0	0	0	0	0	0
(b) (6)		1	2	3	0	0	0	0	0	0	0	0	0
(b) (6)		1	2	3	0	0	0	0	0	0	0	0	0
(b) (6)		1	1	2	0	0	0	0	0	0	0	0	0
(b) (6)		0	5	5	0	0	0	0	0	0	0	0	0
(b) (6)		3	4	7	0	0	0	0	0	0	0	0	0
(b) (6)		1	1	2	0	2	2	0	0	0	0	0	2
(b) (6)		0	2	2	0	0	0	0	0	0	0	0	0
(b) (6)		2	3	5	0	0	0	0	0	0	0	0	0
(b) (6)		2	3	5	0	0	0	0	0	0	0	0	0

⁴ Erroneous appointment and lost employment consideration occurs due to inappropriate merging of categories if adjusted cutoff score for new BQ is not supportable.

⁵ This is the 2nd certificate issued for same vacancy announcement addressed in footnote above and has same basis for erroneous appointment and lost employment consideration.



INTERNAL AUDIT REPORT

**Review of Tuition Assistance Disbursements
for School Year 2011/2012**

BACKGROUND

INTRODUCTION

The Bonneville Power Administration's (BPA) Talent Acquisition (NHQ) organization administers the Tuition Assistance program under the aegis of the Student Career Experience Program (SCEP). Specifically, NHQ recruits and counsels SCEP students, manages their individual work/study agreements and program files, and implements provisions of Personnel Letter 213-01 ("policy"), dated November 2006, which defines the SCEP. In conjunction with Disbursement Operations (FTD), NHQ also deploys tuition funds to eligible students in accordance with provisions of Attachment 2 of PL 213-01, which defines the objectives, eligibility criteria and other provisions of the Tuition Assistance program in detail.

Tuition assistance funds are issued to the student directly for payment of eligible tuition expenses not covered by other forgivable resources (scholarships, grants, stipends, and other monies that do not need to be repaid). The student is required to provide documentation of what was paid by submitting supporting copies of bills/invoices. Any assistance paid may require reimbursement from the student, or may be deducted from a subsequent tuition assistance payment, if subsequent documentation does not completely support the assistance payment.

FTD management requested Internal Audit to perform an assurance audit on the Tuition Assistance disbursements made under SCEP for school year 8/1/11 through 7/31/12. Thirty-five employees participated in the program and received a total of \$190,719.55 in tuition assistance during this time period.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objective of our review was to provide assurance that tuition assistance disbursements made for school year 2011/2012 complied with BPA policy and guidelines. Specifically, we evaluated whether disbursed amounts were calculated in accordance with policy and guidelines, had the required supporting documentation and were used for eligible expenses.

Though we initially selected and tested a random sample of 23 out of the 35 students for testing, the results indicated process issues that would be better understood by expanding our review to all 35 of the students.

The criteria underlying our reviews were primarily derived from the Tuition Assistance Guide and applicable clauses of PL 213-01, which states that "the total eligible costs minus total forgivable resources equal the maximum amount of allowable tuition assistance the student is entitled to request from BPA." Tuition assistance disbursements covering eligible expenses do not need to be repaid to BPA.

Our review consisted of verifying that:

- each student had an SCEP agreement including a new signed worksheet,
- each student was disbursed the amount approved by the Chief Human Capital Officer (CHCO),
- the calculations of eligible expenses and any subsequent refunds due from the students were accurate,
- eligible expenses allowed and not allowed were valid and supported,
- forgivable resources were appropriately included in the calculation for tuition assistance, and
- eligible expenses were appropriately reduced when loans paid a portion of the tuition.

FINDINGS AND RECOMMENDATIONS

SUMMARY

We noted that controls were strengthened by NHQ and FTD in the last year by appending a new worksheet to the SCEP agreement, which is completed and signed by the student and their manager. The purpose of the new worksheet is to better document and attest to that student's eligible costs and forgivable resources. The Tuition Assistance Guide ("guidelines") was also revised to clarify interpretation of eligible expenses for the program.

We found that all students had an SCEP agreement with a new signed worksheet, and that the amount of tuition assistance provided to each student agreed to the amount approved by the CHCO. However, we noted that:

- the policy is outdated and conflicts with the guidelines regarding certain allowable expenses;
- SCEP agreements do not address the policy requirement that students meet one of three criteria to be included in the Tuition Assistance program;
- student documentation was not obtained in a timely way resulting in disbursement of subsequent semester/term payments prior to completing students' analyses, overpayment of funds and students currently owing BPA a refund; and
- there were errors in the underlying calculation of eligible expenses and refunds due from the students.

We recommend that Talent Acquisition improve internal controls over the Tuition Assistance program in each of these areas.

POLICY OUTDATED AND CONFLICTS WITH GUIDELINES

Some parts of the policy no longer appear to accurately reflect the current program. For example, the policy states that debit cards are issued with a set amount loaded and then the student uses it to pay for eligible tuition expenses. However, this method of payment for tuition expenses was discontinued two years ago. For the current school year, the students received a cash disbursement which they were to use to make direct payment for the eligible tuition expenses. Since the policy is outdated, the current procedures are different than those defined in PL 213-01. Our review also noted other areas needing updating.

We also found that the guidelines contradict provisions of PL 213-01 regarding treatment of “mandatory fees”. The guidelines exclude these expenses expressly while all mandatory fees are considered eligible under PL 213-01. Examples where mandatory fees were not included as eligible expenses, but would appear to be eligible under the policy provisions are:

- The U-Pass at University of Washington (mandatory fee effective September 2011) and the health fee at Oregon State University.
- Students enrolled in recreational PE courses such as diving, boating, etc. incur mandatory fees such as a PE activity fee, diving course fee, boat rental fee, etc., which are required fees for courses taken. Unless the policy is revised to exclude these courses, these expenses appear to be eligible expenses.

Recommendation 1: Talent Acquisition should review and present for approval an updated policy that accurately reflects the current intent and requirements for the Student Career Experience Program.

Recommendation 2: Talent Acquisition should revise Personnel Letter 213-01 and/or the Tuition Assistance Guide to clarify and remove any contradictions.

ELIGIBILITY CRITERIA NOT ADDRESSED IN SCEP AGREEMENTS

The policy requires that students meet one of three criteria to be included in the Tuition Assistance program (see Appendix). We found no support for meeting one of these criteria in any of the SCEP agreements for the 35 cases we reviewed.

Recommendation 3: Talent Acquisition should revise the Student Career Experience Program document to require the manager’s description of how the student meets one of the three criteria to be eligible for tuition assistance.

STUDENT DOCUMENTATION NOT OBTAINED IN A TIMELY WAY

Students are required to submit supporting documents for eligible expenses, loans and forgivable resources within 3 weeks of payment. This includes providing an account summary from the school showing expenses and payments on their account. For a

significant number of students, NHQ did not obtain documentation on a timely basis to update their calculations of eligible expenses. Additionally, some students did not provide school account summaries. These issues contributed to subsequent semester/term payments being disbursed prior to completing the students' analyses, which resulted in overpayment of funds for many students during the year. Dates on some documentation (such as fax dates, dates of screen prints, etc.) provided evidence that at least one third of the population provided their documentation later than the required three weeks. However, since the audit start was delayed due to documentation not being available for our testing, it appears that a significant number of students didn't provide documentation until requested in June/July 2012, well after payments were made for the fall through spring terms/semesters.

According to the policy, funds can be held until documentation is provided. NHQ needs to obtain account summaries from the school as required to assure that no forgivable resources were applied to the student's account to pay for eligible expenses that were included in the BPA assistance payment.

Recommendation 4: Talent Acquisition should develop controls to assure documentation from students is obtained, updates of their calculations for tuition assistance are performed in a timely manner and subsequent semester/term payments are withheld until sufficient documentation has been provided to support previous assistance payments.

ERRORS IN REVIEW OF STUDENTS' TUITION ASSISTANCE FILE

Based on criteria from the policy, the guidelines, and discussions with management and staff, we recalculated the eligible expenses, assistance payments and any subsequent refunds due from the students and noted several differences. At the time of our review NHQ identified approximately \$12,300 in refunds due. Our review resulted in total refunds due of approximately \$14,600.¹ Overall, our recalculations had the following results:

- 20 students had eligible tuition expenses the same as calculated by NHQ.
- 9 students had eligible tuition expenses higher than those calculated by NHQ.
- 6 students had eligible tuition expenses lower than those calculated by NHQ.
- 26 students owe the balance due as calculated by NHQ.
- 5 students owe more than the balance due as calculated by NHQ.
- 4 students owe less than the balance due as calculated by NHQ.

Differences between our recalculations and the NHQ calculations were generally due to the following:

- Mandatory fees not included in the calculation for eligible tuition expenses.
- Forgivable resources not included in the calculation for eligible tuition expenses.

¹ Details are available upon request. In some cases, timing differences may have an impact on calculations.

- Loans not appropriately reflected in the calculation.
- Mathematical errors.
- Insufficient documentation to support tuition expenses.
- Ineligible costs included in the calculation for eligible tuition expenses.

NHQ needs to develop review procedures to better assure assistance payment amounts are accurate and valid. This review could be aided by development of a self-assessment checklist with pertinent prompts for the preparer and/or reviewer.

Recommendation 5: Talent Acquisition should institute review procedures for students' tuition assistance files, including the calculation of eligible expenses (mathematical analysis accuracy, eligible expense/forgivable resource identification) and the adequacy of documentation support.

Appendix

The amount of tuition assistance may vary from student to student, based on staffing requirements of each BPA organization and their training budget. BPA is not required to provide tuition assistance to every student. Decisions to award tuition assistance should be based on one of the following criteria:

1. Recruitment Issues: The occupation of the position the student will occupy upon graduation must be one for which BPA is experiencing a shortage or anticipates a succession planning need.
2. Retention Issues: The student requires additional funds to remain in the program and BPA has already invested tuition assistance and organizational resources, which will be lost, if the student is required to leave the program.
3. Other Issues: A special organizational requirement (diversity goals, geographic location, special assignment, etc.) exists for the specific student.

(Source: Personnel Letter 213-01. Attachment 2: TUITION ASSISTANCE COMPONENT)



Assessment of Select Category Rating Cases and Review of Category Rating Practices in Referral List Generation

July 23, 2012

This report contains client confidential information

This document contains an analysis by Avue Technologies Corporation of the policy issues addressed for the sole purpose of assisting its client in evaluating policy options. While Avue has substantial experience and expertise in matters of federal government workforce management, including with respect to applicable law and regulation, this analysis has not been prepared or reviewed by attorneys and is not intended to be used as a legal opinion with respect to any of the matters addressed.

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BACKGROUND

Bonneville Power Administration (BPA) uses category rating in its process to fill positions under delegated examining. In this process, a cut-off score is used, in some cases, to create referral lists.

At BPA, when the selecting official or the human resources practitioner determines the volume of candidates in the Best Qualified group are too considerable to be manageable, a cut-off is used to reduce the number referred. BPA expressed concern that this practice may have had an adverse impact on veterans potentially causing them to lose consideration for vacancies, lose certification for vacancies, and/or result in erroneous appointments.

OVERVIEW OF FINDINGS

According to the Uniform Guidelines on Employee Selection Procedures¹, use of cutoff scores is acceptable as long as the selection procedure is properly validated and there are practices to ensure no adverse impact with regard to Federal laws prohibiting employment practices which discriminate on grounds of race, color, religion, sex, and national origin.

H. Cutoff scores. Where cutoff scores are used, they should normally be set so as to be reasonable and consistent with normal expectations of acceptable proficiency within the work force. Where applicants are ranked on the basis of properly validated selection procedures and those applicants scoring below a higher cutoff score than appropriate in light of such expectations have little or no chance of being selected for employment, the higher cutoff score may be appropriate, but the degree of adverse impact should be considered.

At BPA, the Best Qualified (BQ) group is defined as candidates having high proficiency or expertise in the subject matter AND who can perform effectively in the position with only minimal training or orientation. This conforms with Office of Personnel Management (OPM) regulations, the Uniform Guidelines on Employee Selection Procedures, and Merit System Principles. BPA defines the BQ group as would be those who have scored 90 or above in a score-based rating process.

However, BPA's Standard Operating Procedure (SOP), dated November 2, 2010, does not address the establishment of higher cut-off scores and does not mention that this practice is acceptable. There is a sentence in the SOP, however, that may lead one to think that there is an option to refer or not refer everyone in the highest category. Page one of the SOP states that

¹ Reference Section, 60-3.5 - General standards for validity studies.

"the names of all eligible candidates in the highest quality category are referred on the Certificate of Eligibles to the selecting official for consideration (emphasis added)," whereas page five of the guide states that "Names of all eligible candidates in the highest quality category may be referred on the Certificate of Eligibles to the selecting official for consideration, with preference eligibles listed ahead of non-preference eligibles (emphasis added)."

This sentence could have led to the impression that it is acceptable and permissible to refer fewer than the full complement of BQ candidates, as generally, the word "may" is interpreted as optional. The only scenario that comes to mind where it would be acceptable to refer less than the full complement of BQ candidates would be when there are veterans on the BQ list. When filling positions with external candidates, qualified veterans must be selected ahead of non-veterans. In this scenario, it is acceptable not to refer the non-veterans.

Use of cut-off scores or forwarding candidates above the first natural break in points has its roots in the Rule of Three DEU process that preceded Category Rating as well as in internal merit promotion processes. For example, OPM guidance discusses referral all qualified candidates appropriately rated and ranked where the cut-off score is commonly used to determine the group referred.

5 CFR Part 332: "When OPM or an agency's delegated examining office (DEO) uses the traditional "Rule of Three" ranking and selection procedures, the selecting official requests a list of eligible candidates who meet the minimum qualification requirements. OPM or the DEO is required to provide either a list of all qualified candidates, appropriately rated and ranked, or enough names from the top of a register of qualified candidates, appropriately rated and ranked, to permit an agency to consider at least three candidates for appointment with respect to each vacancy that the agency intends to fill (5 U.S.C. 3317(a)). Under this procedure, eligible candidates are assigned numerical scores, including veterans' preference points of 5 points or 10 points, as applicable (5 U.S.C. 3309, 3313).

BPA conducted an internal audit of cases where cut-off scores at levels higher than 90 points were established to reduce the volume of candidates to a more manageable level. This audit was conducted promptly after BPA discovered the use of this practice. This review shows that there were instances where candidates missed consideration as a result of establishing a higher cut-off score to create the BQ group. Neither the DEOH or the Department of Energy policy for the use of Category Rating dated August 27, 2010 permits the further restriction of scores.

Although the practice, on the surface, might appear alarming, examination of the problem in more detail, in particular the statistics from cases that were individually reviewed in the internal audit, no adverse impact pattern regarding veterans emerges. In fact, of the 50 cases, only 11 affected veterans leaving 78% affecting non-veterans. Since veterans' preference is a statutory preference, adverse impact is proven in cases where there is a negative effect on a group with statutory protections.² The insertion of cut-off scores was a practice to help reduce the BQ

² It is a prohibited personnel practice to "grant any preference or advantage not authorized by law, rule, or regulation to any employee or applicant for employment (including defining the scope or manner of competition or the

group to a manageable size rather than an attempt to disqualify veterans or to circumvent veteran's preference. See Attachment A for the full case listing resulting from the BPA internal audit.

The following table shows the categories of possible impact on candidates resulting from raising the cut-off score above the 90+ point SOP rules.³ This table shows the definition of each of the three categories. The full listing of impact veterans and non-veterans is in Attachment A and is summarized below.

There are three categories of candidates that were impacted by these decisions:

- Erroneous appointment – 13 candidates impacted of which 15 percent were veterans.
- Lost Consideration – 34 candidates impacted of which 32 percent were veterans
- Lost Certification – 165 candidates impacted of which 6 percent were veterans.

Category	BPA Definition	DEOH Definition
Lost Consideration	Occurs when an eligible is misranked on or left off a certificate but correcting the error would not give the eligible real employment consideration. For example, an eligible was left off a certificated but would not have been within reach for selection, even if he/she had received proper treatment, because a veteran on the certificate would have absolute selection preference for category rating.	Lost certification occurs when an eligible is misranked on or left off a certificate but correcting the error would not give the eligible real employment consideration.
Erroneous Appointment	An appointment without a proper authority or legal basis. For example, a non-veteran erroneously appointed because a veteran was incorrectly left off the selection certificate. Another example: a veteran is appointed but should not have been placed on the selection certificate because quality categories were inappropriately merged.	Erroneous certification occurs when an eligible does not appear in the correct order on the certificate (i.e., was misranked on a certificate or did not appear on the certificate at all) or when an eligible appeared on the certificate but did not receive appropriate consideration. There are two principal types of erroneous certification, those that: 1. Involve a violation of law (e.g., "rule of three" or Veterans' Preference Act), and 2. Do not involve a violation of law (e.g., an administrative error). Correcting an erroneous appointment: In the case of erroneous certification, you always have the option of regularizing the

requirements for any position) for the purpose of improving or injuring the prospects of any particular person for employment;" Title 5 - Part iii, Subpart A, Chapter 23 Section 2302 - prohibited personnel practices.

³ It should be noted that candidates for BPA positions must score at least 91 to be considered eligible for the BQ group under its category rating SOP.

Category	BPA Definition	DEOH Definition
Lost Employment Consideration	<p>The more serious type of erroneous certification involving violation of law. Example, if a veteran is incorrectly left off a selection certificate and a non-veteran is appointed resulting in an erroneous appointment, then the veteran has lost employment consideration. In order for there to be a legal violation, all four conditions must be met:</p> <ol style="list-style-type: none"> 1. A selection must be made from the erroneous certificate 2. When the erroneous certification is corrected, the misranked eligible must move within reach of selection; 3. When the erroneous certification is corrected, the selectee must move out of the range for selection 4. The misranked eligible must meet all the qualifications for the job. 	<p>appointment by removing the incumbent, if the selectee enters on duty before the error is discovered.</p> <p>The more serious type of erroneous certification is in case where there is a violation of law (e.g., Title 5 of the United States Code and the Veterans' Preference Act of 1944.) This type of erroneous certification is known as Lost Employment Consideration or Loss of Bona Fide Employment Consideration. When considering your options for correcting any lost employment consideration actions, you should be mindful of any hiring restrictions of other placement assistance programs (e.g., CTAP, ICTAP, RPL), for the geographical areas. Conditions for a legal violation: In order for there to be a legal violation, all four conditions must be met:</p> <ol style="list-style-type: none"> 1. A selection must be made from the erroneous certificate; 2. When the erroneous certification is corrected, the misranked eligible must move within reach of selection; 3. When the erroneous certification is corrected, the selectee must move out of selection range; and 4. The misranked eligible must meet all the qualification requirements for the job.

A total of 13 delegated examining vacancy announcements were designated by BPA for review, however, a total of 6 cases were reviewed. The remaining cases can also be reviewed, however, the 6 reviewed found that the internal audit correctly identified the problems and the impacted individuals and the findings of the first internal audit are likely to stand. The 13 cases were selected from the core group of 50 identified in the internal audit as having potential violations of veterans' preference.

The audit examined all key aspects of the staffing process relative to these files to determine if all the referral lists had been processed in an administratively and legally correct manner. The vacancies with legal violations or potential legal violations are presented below.

In all cases reviewed, a ranked list of candidates scoring 91 and above was prepared. A determination was then made as to a reasonable number of candidates to refer to the selecting official based on the cut-off score process. Those candidates were then determined to be Best Qualified and referred to the selecting official for consideration. In all cases, a veteran, who scored at least 91 but under the cut-off score process was not referred. In accordance with 5 CFR:

5 CFR Chapter 337 Subpart C – Alternative Rating and Selection Procedures, Subpart 304(a) indicates “Veterans Preference must be applied as prescribed in 5 U.S.C.3319(b) and (c)(2). 5 USC 3319(b) indicates: Within each quality category established under subsection (a), preference-eligibles shall be listed ahead of individuals who are not preference eligibles. For other than scientific and professional positions at GS-9 of the General Schedule (equivalent or higher), qualified preference-eligibles who have a compensable service-connected disability of 10 percent or more shall be listed in the highest quality category. (c)(2) indicates, the appointing official may not pass over a preference eligible in the same category from which selection is made.

Based on Category Rating procedures, had the candidates with a score of 91 and above been referred, the veteran would have been ranked as Best Qualified and should have been placed at the top of that category. These veterans lost consideration, along with many non-veterans that may have lost consideration if any of the veterans declined.

According to DEOH, Chapter 6, Section E, Lost Employment Consideration:

1. If a legal violation has occurred, in order to correct the violation, the following steps should be taken to correct the erroneous certification.
2. If you determine an eligible lost consideration on a certificate, the selecting official can make a voluntary offer of non-competitively appointing the eligible to one of the following positions:
 - a. An identical job (same series, same grade, same promotion potential, same tenure, same geographic location or any location the eligible deems acceptable).
 - b. An equivalent job (same grade, same promotion potential, same tenure) for which the eligible qualifies in the same geographical location in which the eligible lost consideration or in any geographic area that the eligible considers acceptable.

If the selecting official declines to make any of the voluntary offers listed above, or the eligible declines a position because it is not in either the same location or one in which the eligible indicated was acceptable, then the following steps are mandatory:

1. The eligible must receive priority consideration for the next appropriate position announced under competitive procedures; and,

2. The eligible would be listed on a certificate of eligible as the first eligible candidate for consideration under the "rule of three."

The appointing official has the option of offering the eligible either or both of the following:

1. Offer employment to any equivalent job (same grade, same promotion potential and same tenure) within the agency for which the eligible is minimally qualified in any geographic area that the eligible deems acceptable. (This only applies to 10 point preference eligible).
2. Offer employment to any equivalent job (same grade, same promotion potential and same tenure) within the agency for which the eligible is well qualified in any geographic area that the eligible deems acceptable.

In the time allotted, Avue was able to review the following cases in-depth.

Vacancy Announcement Number	Position Title	PP Series, Grade
(b) (6)		GS (b) 1-9/11
		GS (b) 3-9/11/12
		GS (b) 9/11/12
		GS-9/11/12
		GS (b) 1-12
		GS (b) 1-12/13

Avue reviewed these cases and validated the findings of the audit group.

Further, the case review identified the following additional issues for corrective action. These will help the HR specialists improve the quality of the applicants being referred.

1. Level Definitions of KSAs: In some cases, it was difficult to distinguish between the level definitions. In at least one case, the KSA level definitions for both grades were exactly the same. There should be a clear differentiation between the levels in order to provide the manager with the top quality candidates.
2. BPA Human Resources appears to review the candidates for basic qualifications. Subject Matter Experts (SME's) then rank the candidates according to the crediting plan. It appears from reviewing the case files, if the SMEs rate the applicant 0 in a KSA, usually the first/second KSA, the applicant is deemed not qualified. BPA is using the KSA as a screen-out/selective placement factor. There is no indication of the screen-out/selective placement factor on the vacancy announcement as required in DEOH, Chapter 3, Section C, Create a Job Announcement.
3. In most cases reviewed, when the panel members had different scores and their scores were totaled, the higher of the two scores became the raw score. In at least one case reviewed, the raw score was the lower of the two scores. In this particular case, only two applicants were referred to the manager for consideration. Had the higher score been used, the manager could have possibly received additional candidates.
4. The case files maintenance is a particularly notable problem.
 - Unfamiliarity with forms in each file that were not self-explanatory. For example:
 - a. Undated, unlabeled lists of applicants that appear to be in Category order; however, there were other lists of the same applicant pool with different

- scores/different categories/different order of applicants. Some of these lists were labeled with a grade (on career ladder cases), others were not.
- b. Large applicant pools with boxes of applications; the rating sheets are separated from the applications, as are the basic quals sheets, so they must be located and reassembled to reconstruct.
 - c. Another type of list of applicants that appeared to come from an automated system (HRMIS) and it was unclear of the purpose and use of so many different lists, particularly if the actual referral lists had conflicting date with these other lists.
 - d. Some files included crediting plans, others did not and those had to be requested separately.
 - e. The logistics of actually accessing the files could be onerous at times, since this particular group of files was being kept under lock and key.

RECOMMENDATIONS

Consideration should be given to the types of cases where scores were changed from the predefined score for BQ. It is important to recognize patterns, if any, to the types of vacancies in which a cut-off was inserted. By looking at the title, series and grade of such positions, a picture may emerge as to the type of vacancies that attract large volumes of applicants and those that have large numbers of candidates that are rated in the BQ category. This review should then inform RSAs and selecting officials of the kinds of adjustments that can be made to: 1) the area of consideration; 2) the nature of the recruitment outreach, 3) the length of time the announcement is open to accept applications, and 4) the type and level of experience required to score in the BQ category.

BPA should modify their SOP so that RSAs and selecting officials are aware that all individuals that fall within the highest quality category should be referred for consideration, with no ambiguities. BPA should revise their current SOP to document the cut-off score of 91 versus 90 or to permit a natural break in points as the cut-off for BQ group determination. BPA should revise its SOP to:

- Re-define their categories,
- Incorporate procedures to include an RSA review of determinations made by SMEs for both rating and ranking of candidates,
- Ensure there is a clear distinction in KSA level definitions at all grade levels, and
- When more than one panel member is used to rank eligible candidates, ensure consistency in determining the raw score. Incorporate these procedures in SOP.

Applicant pools for other similar vacancies should be carefully analyzed. If it is determined that the candidate pool has been too large to be effectively managed, then the qualifications criteria for the position should be reviewed to determine if there should be a more stringent definition for best qualified. These requirements should be made before jobs are announced so that potential applicants are aware of them before they complete the application process. In

addition, subject matter experts should be involved in determining these more stringent criteria for consistency and for accuracy.

Consideration should also be given to setting up an additional review step, using Avue's Assessment List process, which will allow selecting officials and subject matter experts to hone in more succinctly on the type of work experience, education, and other quality factors that define the absolute best qualified among the best qualified candidates. These candidates would be the ones that are ultimately referred to the selecting official for consideration. This is an acceptable and fair practice in that all candidates in the BQ list would receive this review and not be arbitrarily weeded out based on the selection of a number score.

BPA should identify the RSAs and selecting officials for past vacancies where a cut-off score was inserted, in order to determine if their actions were from lack of knowledge, a misunderstanding of the requirements, or from the desire to weed out candidates in order to give the selecting official a name or names of individuals they wanted to consider. In any of these cases, additional training and/or guidance/discussion is necessary to steer them to more appropriate ways of winnowing down the applicant pool to the best of the best.

In all cases where a veteran, who scored at least 91, but under the cut-off score was not referred, a legal violation occurred. According to regulatory requirements the following are the only two options available to correct this violation:

Option 1: Offer the eligible candidates either an identical or equivalent job in which the eligible qualifies in the same geographic location the eligible lost consideration or any location the eligible deems acceptable,

Option 2: request a variance for the illegal appointments, and grant priority consideration to all affected eligibles.

Finally, Attachment B contains a brief synopsis of the (b) (6) case which Avue was asked to additionally review. The case does indicate that the candidate selected did not meet minimum qualifications for the position. In part, this is due to the candidate's score during the 'technical interview' which was clearly defined as part of the basic qualifications for the position. Inclusion of the technical interview as part of the basic qualifications screening requires that the candidate pass that screening to be considered qualified.

Attachment A: Full Case Listing

Attachment B ^{(b) (6)} Case

Position: (b) (6)

Vacancy Announcement Number: (b) (6)

Applicant: (b) (6)

Assignment: Compare (b) (6) application to requirements of the position as stated in the vacancy announcement and determine if he met minimum qualifications.

Minimum Requirements:

The vacancy announcement states the following requirements for the position:

1. Must have good driving record (screen-out)
2. Must affirm all "conditions of employment" (included in application package)
3. Must travel 6-10 nights per month
4. Must meet the physical requirements
5. "Technical interviews will be required *for all candidates determined qualified* (emphasis mine)
6. Must establish residency
7. Must sign Mobility Agreement
8. Must address 5 job elements:
 - a. Ability to perform the work of a (b) (6) without more than normal supervision (screen-out)
 - b. Knowledge of the assembly, adjustment, and repair of electronic communication equipment
 - c. Use of electronic test equipment
 - d. Knowledge of electronic communication theory
 - e. Knowledge of electronic equipment and troubleshooting procedures

In order to meet minimum requirements for this position, the applicant must receive a minimum of 2 points on the screen-out element (#1), and an average of 2 on the remaining elements.

(b) (6) Application Status:

The applicant submitted a resume and completed the supplemental form for the position. A comparison of what he submitted to the above requirements shows:

1. Documentation in file of good driving record.
2. Applicant affirmed all conditions of employment.
3. Could find nothing in the file regarding affirmation of travel requirements.
4. Documentation stated no physical exam required since he is currently employed in a position with the same or higher physical requirements.
5. Applicant *did not pass the technical interview* – received all zeros from a 3-member panel.

6. Applicant lives less than one hour commuting distance from the duty station headquarters, as required in the vacancy announcement.
7. Mobility Agreement signed
8. Job elements scoring (2 raters, with identical scores). Applicant meets the scoring requirement to be considered minimally qualified:
 - a. Ability to perform the work of (b) (6) without more than normal supervision (screen-out) = 2
 - b. Knowledge of the assembly, adjustment, and repair of electronic communication equipment = 4
 - c. Use of electronic test equipment = 2
 - d. Knowledge of electronic communication theory = 2
 - e. Knowledge of electronic equipment and troubleshooting procedures = 0

Finding:

Eight requirements were outlined in the vacancy announcement. Documentation could not be found to validate item #3, and applicant did not meet item #5. Applicant does not meet minimum qualifications for the position.



Classification Policy Analysis Framework

This document contains an analysis by Avue Technologies corporation of the policy issues addressed for the sole purpose of assisting its client in evaluating policy options. While Avue has substantial experience and expertise in matters of federal government workforce management, including with respect to applicable law and regulation, this analysis has not been prepared or reviewed by attorneys and is not intended to be used as a legal opinion with respect to any of the matters addressed.

GS-14/15 Non-Supervisory Position Classification

July 19, 2012

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BACKGROUND

Bonneville Power Administration (BPA) has 310 nonsupervisory positions classified at grades 14 or 15. The Department of Energy, which exercises oversight of the position classification program at BPA, has stated that positions classified in this manner, particularly with the combination of Knowledge Required by the Position at level 1-8 and Supervisory Controls at level 2-5, under the Factor Evaluation System (FES), will be subject to review over the next three years to assess the accuracy of the position classification actions involving these jobs. This analysis provides a draft policy framework to be used in accurately crediting factor levels 1-8 and 2-5 in nonsupervisory GS-14 and 15 positions at Bonneville.

Overview of Findings

One factor in determining the proper classification analysis is to determine the organizational level of BPA within the structure defined by classification standards and guidance issued by the US Office of Personnel Management (OPM). This is, in part, to determine the level of complexity, degree of independence, and scope and effect of these positions in order to ensure the requirements of the factor levels are met.

Note that defining what is meant by the term “agency” in this document is focused exclusively for position classification purposes and OPM definitions and guidance as related to position classification must be applied with “sound classification judgment” and, over time, definitions are augmented by classification appeal decisions which must be taken into consideration when applying OPM guidance. The purpose of providing the exercise of “sound classification judgment” is to allow for application of government-wide guidance to specific circumstances which may not have been known, contemplated, or considered at the time the OPM guidance was written. Unlike regulations, classification standards and guides are meant to be applied with judgment as to both applicability and context, taking into account unique factors such as in this discussion.

From reviewing information on BPA’s web site and looking at the language in many of the position descriptions from various functional areas within BPA, it is clear that BPA is properly allocated the designation of ‘agency’ which OPM defines, in the General Schedule Supervisory Guide, as

“...an Executive or military department as specified by 5 U.S.C. 101, 102, and 5102, which has primary authority and responsibility for the administration of substantive national programs enacted by Congress; a comparable independent agency; or a large agency next below the Department of Defense with worldwide missions and field activities,

multibillion dollar programs or resources to manage, and major mission(s) directly affecting the national security. The head of an agency is usually appointed by the President with the advice and consent of the Senate. For example, the Departments of Labor, Health and Human Services, Agriculture, Army, Navy, Air Force, the General Services Administration, the National Aeronautics and Space Administration, the Office of Personnel Management, and the Defense Logistics Agency are Agencies for purposes of this guide.”

Agencies generally have responsibility for substantial national programs enacted by Congress. BPA was created by an act of Congress in 1937. Their mission was to market electric power from the Bonneville Dam on the Columbia River, which flows down from Canada to the United States. At the time of the enactment of the Bonneville Project Act, the northwest was largely rural with little access to affordable electricity. There was a group created called the Pacific Northwest Regional Planning Commission, with one representative each from Idaho, Montana, Oregon and Washington. Their December 28, 1935 report suggested an **independent federal agency** be created to market the power from Bonneville and Grand Coulee dams. They further said that the **agency** should be modeled after the Panama Canal Company. Their mission would be to operate the generators and build and operate the regional transmission lines.

Congress approved the Bonneville Project Act, which included the Commission's key recommendations, and President Franklin Roosevelt signed it into law on August 20, 1937. The act stipulated that the new power **agency** would market and transmit power from federal dams and “...give preference and priority in the use of electric energy to public bodies and cooperatives.” It was intended to be temporary until a regional power authority could be created. The Tennessee Valley Authority was a much-cited model, but despite many efforts, a Columbia Valley Authority was never created. The Bonneville Power Project was renamed the Bonneville Power Administration in 1940.

Additional information in the Bonneville Project Act provides some sense of the relationship between BPA and Department of the Interior, which was the original Departmental placement of BPA. It states that “the office of the Administrator of the Bonneville project is appointed by the Secretary of the Interior, and that the Office of the Administrator is to be an officer of the Department of the Interior, responsible to said Secretary of Interior.” From that point forward in the Act, all other references are to the authority, scope and program mission of the BPA Administrator.¹

A review of several statutes and derived authorities associated with BPA provides interesting data. For example, through legislation, the BPA Administrator's pay is set at Level V of the Executive Schedule (ref. Government Organization and Employees

¹ Bonneville Project Act, §2(a), 50 Stat.732, as amended by Act of March 6, 1940, ch.47, §§1 and 2, 54 Stat.47; Act of Oct.23, 1945, ch.433, §5, 59 Stat.547; Reorganization Plan No.3 of 1950, §§1 and 2, 64 Stat.1262, and DOE Act, §§302(a)(1)(D), (2), 91 Stat.578, Aug.4, 1977.

Act, 5 USC Chapter 53, Subchapter II (2006). Another Act, the Federal Power Act, as amended by the Energy Policy Act of 2005 Public law No. 109-58, provides a definition that is applicable to BPA:

The definition “**Federal power marketing agency**” means any agency or instrumentality of the United States (other than the Tennessee Valley Authority) which sells electric energy. The emphasis here is that the statute refers to the Bonneville Power Administration as an agency.

There is a Historical Note in the Third Power Plant Act stating that “*The functions of the Secretary of the Interior with respect to the Bonneville Power Administration were transferred to the Secretary of Energy by section 7152(a)(1)(D) of Title 42, later amended to section 7152(a)(1)(C). Section 7152(a)(2) of Title 42 provides that the Bonneville Power Administration be preserved as a **distinct organization** within the Department of Energy and headed by an Administrator.*”²

A review of applicable statutes shows us that references to the Department of Energy with respect to power transmission and marketing doesn't occur until about 2006, in the Pacific Northwest consumer Power Preference: Reciprocal Priority in Other Regions (16 USC Chapter 12F (2006)). There, for the first time, the term “the Secretary” is used extensively to outline authorities and responsibilities.

In the Federal Columbia River Transmission System Act, 16 United States Code Chapter 12g (2006). Act of Oct. 18, 1974, 88 Stat. 1376. Public Law No. 93-454, S. 3362, includes a provision that “*Other than as specifically provided herein, the present authority and duties of the Secretary of Energy relating to the Federal Columbia River Power System shall not be affected by this chapter. The authority and duties of the Administrator referred to herein are subject to the supervision and direction of the Secretary.*” Another clarifying statement in the same Act states that: “*The Secretary of Energy, acting by and through the Administrator, shall operate and maintain the Federal transmission system within the Pacific Northwest and shall construct improvements, betterments, and additions to and replacements of such system within the Pacific Northwest as he determines are appropriate and required...*”

As it concerns funding, the Federal Columbia River Transmission System Act provides some insights into BPA's funding:

“There is hereby established in the Treasury of the United States a Bonneville Power Administration fund. The fund shall consist of (1) all receipts, collections, and recoveries of the Administrator in cash

² Exact citation is found in the Department of Energy Organization Act, 42 USC Chapter 84 (2006), Act of August 4, 1977.

from all sources, including trust funds, (2) all proceeds derived from the sale of bonds by the Administrator, (3) any appropriations made by the Congress for the fund, and (4) the following funds which are hereby transferred to the Administrator: (i) all moneys in the special account in the Treasury established pursuant to Executive Order Numbered 8526 dated August 26, 1940, (ii) the unexpended balances in the continuing fund established by the provisions of section 832j of this title, and (iii) the unexpended balances of funds appropriated or otherwise made available for the Bonneville Power Administration. All funds transferred hereunder shall be available for expenditure by the Secretary of Energy, acting by and through the Administrator..."

In the Energy Policy Act of 2005, 25 United States Code Chapter 37 (2006). Act of Aug.8, 2005, Title V, 119 Stat.594, Public Law No.109-58, H.R.6 (S.10), a definition of *Federal power marketing administrations* was provided. The definition provided here is: *"The term "Administrator" means the Administrator of the Bonneville Power Administration and the Administrator of the Western Area Power Administration. The term "power marketing administration" means the Bonneville Power Administration; the Western Area Power Administration; and any other power administration, the power allocation of which is used by or for the benefit of an Indian tribe located in the service area of the administration."*

BPA was clearly defined as an agency in statute from its inception. Use of the term Administration in lieu of agency does not challenge the structural context of the organization from a position classification standpoint. Unlike other agencies with the designation of "Administration" in the US federal government, the Administrator of Bonneville is not appointed by the President and subsequently Senate confirmed. However, OPM classification guidance clearly states that this is "usually" the case which provides for the definition of agency to be used in cases where the head of the agency is not Presidentially appointed.

A bureau, in contrast, is an organizational unit next below the agency level (as defined above) which is normally headed by an official of Executive Level IV or V, or Senior Executive Service (SES) rank, or the equivalent. It is a component of a civilian agency directed by an appointed executive who reports to the Agency Director or the Director's immediate staff. Examples of bureaus include the Department of Labor's Bureau of Labor Statistics and the Department of Agriculture's Forest Service. Bonneville Power Administration meets and exceeds this definition.

When looking at the first part of OPM's definition of an agency: "an Executive or military department as specified by 5 U.S.C. 101, 102, and 5102, which has primary authority and responsibility for the administration of substantive national programs enacted by Congress," we can see that BPA directly meets this definition in terms of the scope and

effect of the its programs which, while bounded geographically to the Pacific Northwest, have far reaching effects nationally, internationally, and with sovereign nations such as native American tribes. Northwest regional tribes have formed a council to work through issues concerning the ecosystem and related matters which is a relationship that is unique. In addition, because the Columbia River is actually a Canadian river, there is a balancing act that must be worked with respect to the water flow, power transmission and generation, and other concerns of the Canadian government, giving BPA international considerations, which add additional complexity to the issues and concerns BPA must address to ensure effective operations. Its program was enacted by Congress, and it is clear from subsequent legislation that the BPA Administrator has been given broad authority to act.

In addition to the above guidance, the Office of Personnel Management offers an alternative for crediting organizations at the agency level providing certain conditions are met. *“Where 5 or more of the following conditions apply, an activity next below departmental level may be considered as equivalent to this definition for purposes of applying this guide:”*

- (1) *“...the activity comprises or manages more than half of a cabinet level department’s resources...”* The intent of this factor is fully met by the BPA. BPA resources are segregated from the Department of Energy by virtue of the Bonneville Power Administration fund, which is generated by revenues created by the sale of electric energy rather than appropriated by Congress. Since BPA self-generates its funding, by the Administrator’s direct actions and management, BPA’s flow of funds move upward from BPA to the Department Secretary whose access to and direction of funding is enacted only through the BPA Administrator. This is a contrast from traditional government agencies or Departments whose funding is both allocated to and managed by congressional appropriations. Since half or more of the Department’s resources are not congressionally allocated, BPA is directly generating its own funding, and the Administrator is lawfully provided the authority to both generate and expend these funds, the organizational complexity and level of responsibility intended by this description applies directly to BPA.
- (2) *“...the activity has an international mission, and/or numerous Nationwide and worldwide field offices...”* BPA is has an integral relationship with the Canadian Government, state governments in the northwest region, and sovereign tribal nations. This factor is fully met.
- (3) *“...the activity manages multibillion dollar funds accounts typically separate from normal, departmental budgets (e.g., Social Security trust funds, IRS collections)...”* The BPA extended enterprise includes 3,100 employees and, using OMB’s multi-sector workforce definitions comprises a total of 9,000 employees, contractors, and shared interagency resources. According to its audited financial statements, BPA has multibillion dollars in revenues and other

forms of capital and assets under its management. These funds are completely separate from normal, departmental budgets and BPA directly meets the description of these factors.

- (4) *“...the activity deals directly with Congress on major budgetary, program, or legislative matters affecting large segments of the population or the Nation's businesses, or both...”* BPA is directed by Congress to prepare an annual budget, their funds are self-generating, and Congress reviews BPA's funding and authorizing spending levels as a separate and distinct organization from DOE which fully meets the intent of this factor.
- (5) *“...the activity head is appointed by the President with the advice and consent of the Senate...”* The BPA Administrator is appointed by the Secretary of Energy and is not Presidentially appointed. However, as noted above, while this is one of the potential factors, OPM has defined this as a condition which “usually” applies and provides an exemption that meets BPA requirements.
- (6) *“...the activity exercises special statutory powers such as a Nationwide, quasi-judicial function affecting major industries or large segments of the population ...”* The BPA Administrator has the authority to enter into agreements with tribes and local citizens, settle claims, and establish rates for power services that affects the entire northwest region of the United States. BPA's mission and authorities impact large segments of the population, major industries, and other governmental entities including international impacts.
- (1) *“...the activity manages directly delegated or statutorily assigned programs that have an impact which is Government-wide or economy-wide and that receive frequent, intensive, congressional and media scrutiny...”* For item 7, refers to directly-delegated or statutorily assigned programs with a Government-wide or economy-wide impact and that receive frequent, intensive congressional and media scrutiny. They define programs at this level where Congress uses direct statutory authority to underscore the importance it attaches to a program. These programs are highly visible and are under ongoing examination by the media because of their scope and impact. As evidenced by the extensive legislative history of BPA, its importance and stature in major industries and economies as well as large populations dependent on BPA energy supplies and rate setting authorities as well as congressional oversight and media engagement fully meets this factor.

In the Digest of Significant Classification Decisions and Opinions, August 1994, *Interpreting Alternative Definition of Agency*, No. 19-10, The Office of Merit Systems Oversight and Effect sought to explain the intents of items 4 and 7 above. They advised that the alternative definition of “agency” was intended to apply to bureaus and bureau-equivalent organizations which, if removed from their location within Departments and viewed as separate entities, would be comparable to independent agencies and some cabinet-level departments.

Such organizations have staff, budget, worldwide installations and missions, and similar characteristics that clearly equal or surpass those of some cabinet-level departments and most independent agencies. They cite Social Security Administration and the Internal Revenue Service as examples of organizations that merit treatment as agencies, and further state that only a handful of organizations would merit such exceptional treatment. BPA, although not worldwide, has multiple locations, staff, budget, is international in scope, and has unique mission.

One remaining item should be addressed and that is the contrast between this definition and that of a “field office.” Field offices are usually established in locations separate from the main office or agency to provide some measure of convenience to a serviced population, or to take advantage of the availability of a skilled workforce to help meet the agency’s mission. An example would be the IRS establishing field offices in many locations throughout the US and abroad, for the purpose of providing taxpayer information and advice on the timely filing of tax forms. IRS field offices don’t have a separate and distinct mission. In the case of BPA, however, their mission is unique. Legislation established it, defined its mission and authorities, allowed the BPA Administrator to select where they would be located in the northwest part of the US, and determined that it would be self-funded. These facts clearly differentiate BPA and further the appropriateness of its definition as an agency rather than a field office.

BPA meets 7 of the 7 conditions to be considered an ‘agency’ for position classification purposes. This definition supplements support for and application of correlated factor levels assigned to positions at GS-14 and GS-15.

It is also important to understand the structure of the Factor Evaluation System (FES) and its factor level relationships. There is alignment among factors that is defined in the descriptions found in the FES Primary Standard. From the Classifier’s Handbook, TS-1071, dated August 1991:

FACTOR LEVELS	GS-11	GS-12	GS-13	GS-14	GS-15
Knowledge Required by the Position	1-7	1-7	1-8	1-8	1-9
Supervisory Controls	2-4	2-4	2-4	2-5	2-5
Guidelines	3-3	3-4	3-4	3-5	3-5
Complexity	4-4	4-4 or 4-5	4-5	4-5	4-6
Scope and Effect	5-3	5-4	5-4 or 5-5	5-5	5-6
Personal Contacts	6-3	6-3	6-3	6-3	6-3 or 6-4
Purpose of Contacts	7-2 or 7-3	7-3	7-3	7-3 or 7-4	7-3 or 7-4
Physical Demands	8-1 or 8-2				
Work Environment	9-1 or 9-2				

Factor level 1-8, Knowledge Required, calls for a “...*mastery of program principles, concepts, practices, methods, and techniques to apply new developments and theories to major problems not susceptible to treatment by accepted methods.*” To illustrate, for an engineer, this level requires mastery of one or more specialty fields to the extent that the engineer is capable of applying experimental theories, new developments, and experienced judgment to solve the more difficult problems not susceptible to treatment by accepted methods and the skill sufficient to extend and modify existing techniques and develop new approaches for use by other engineering specialists in solving a variety of engineering problems.

In an organization like BPA, many positions for which the crediting of level 1-8 is warranted and appropriate, given the nature of the work. In its 2011-2012 *Talent Management Strategy*, BPA says about the agency:

“BPA augments the impact of an already green system with robust promotion of energy efficiency, integration of renewable resources, and research in new technologies. The Agency also funds regional efforts to protect and rebuild fish and wildlife populations affected by hydropower development in the Columbia River Basin.”

BPA describes the changing energy industry and the realities current and future changes will impose on the agency:

“Climate change remains a key business driver in the industry. Although nation-wide carbon control legislation may not be in effect for several years, the mere potential for such legislation is driving resource choices and infrastructure investments across the West. California's aggressive renewable portfolio standard and prohibitions on coal-fired generation in several states are driving a massive increase in wind energy on BPA's system, posing profound changes to the transmission system. BPA's Wind Integration Team is developing innovative ways to integrate the increasing amount of wind generation on the federal system and to evaluate potential changes to regional market design. The objective of these efforts is to better utilize existing resources to relieve the capacity pressure on the federal hydro system. At the same time, the Northwest Power and Conservation Council's Sixth Power Plan significantly increased the goals for regional energy efficiency. Finally, the search for additional system flexibility extends to the demand side of the equation, with BPA launching new pilot projects in demand-side management and Smart Grid technologies. In summary, the convergent forces of climate change, renewables integration, and energy efficiency will likely drive a significant portion of BPA's strategic agenda over the next 5 to 10 years and will introduce dramatic changes to the Agency's core business.”

Given these realities, level 1-8 is neither unusual nor rare, and there was no intent within the FES structure that this level be out of reach in most two-grade interval administrative and professional job series.

In keeping with the factor alignment design of FES, specifically as related to factor level 2-5, Supervisory Controls, OPM appeal decision 07-04, August 1985, *Appropriateness of Level 2-5*, states that level 2-4 involves a “*high degree of independence and responsibility*,” and concludes that *full technical responsibility* is vested at this level. The position in question was classified in the 1102 series. Regarding level 2-5, they conclude that *the availability of a technically qualified supervisor* must be considered, and that the existence of such a position in the management chain, while not in itself conclusive, makes 2-5 “highly unlikely.” The operative phrase here is “highly unlikely.”

This interpretation by OPM can be rather limiting, and caution must be exercised in making a broad leap that level 2-5 with level 1-8 knowledges should be rare. Most high level supervisors come from the line of work and/or the program area that they are managing. Concluding that, because the manager has personal expertise in the area of specialization, this restricts direct reports being credited for work under “*administrative and policy direction from the perspective of broadly defined missions and functions within the agency*,” and this, alone, can result in positions not being credited with what is actually taking place within the organization.

The OPM appeal decision identified areas where the supervisor generally exercises substantial program control:

- analyzing policies from higher authority and determining their effect on the program;
- formulating and issuing policy statements governing the program;
- establishing procedures to provide for management needs and ensure efficient operations;
- exercising normal supervisory control, including planning and assigning work, setting priorities, and
- giving program guidance.

This level of supervision, i.e., “*substantial program control*,” even with the most experienced and skilled managers, is often exercised in a consultative or team environment. In contrast, the OPM appeal decision, which was issued more than 25 years ago, described an organizational structure where there was more emphasis on a hierarchy and clearly defined stovepipes within an operating environment, with the objective to fit individuals precisely within that hierarchy. Today’s more consultative and collaborative work environments make crediting level 2-5 more realistic and attainable for those positions requiring expertise in technical, professional and administrative work.

A more recent OPM appeal decision, C-1101-14-01, dated August 18, 2003, discusses nonsupervisory duties in the 1102 series credited at level 1-8 for Knowledge Required, but did not question the appropriateness of assigning Supervisory Controls at level 2-5.

Several position classification standards clearly define level 2-5 supervisory controls in technical, professional and administrative work. See Attachment A for a cross series comparison using the GS-0080, 0028, 0800 job family standard, BPA's 1130 series standard, and the 2210 job family standard.

Impact Analysis

A review of BPA HRMIS data shows the following impact on 310 positions within the agency. Employees in each of these positions, with the exception of two of these, have been identified. A full listing of positions and employees is included in Attachment B.

SERIES	# AFFECTED EMPLOYEES
(b) (6)	5
(b) (6)	2
(b) (6)	7
(b) (6)	14
(b) (6)	4
(b) (6)	1
(b) (6)	1
(b) (6)	5
(b) (6)	1
(b) (6)	8
(b) (6)	11
(b) (6)	2
(b) (6)	1
(b) (6)	63
(b) (6)	9
(b) (6)	37
(b) (6)	7
(b) (6)	2
(b) (6)	58
(b) (6)	2
(b) (6)	28
(b) (6)	6
(b) (6)	12
(b) (6)	1
(b) (6)	4
(b) (6)	2
(b) (6)	17

Recommendations

Several position classification and job family standards were reviewed to gain perspective on descriptions of factor levels 1-8 and 2-5 in a work-related context. It is noted that BPA's own classification standard covering 1130 series positions provides factor level descriptions for levels 1-8 and 2-5, as do all the OPM-developed standards included in Attachment A.

As a result, the appropriateness of crediting level 2-5 along with 1-8 should not be an issue for the vast majority of positions at BPA currently credited with these levels. To solidify the classification analysis, however, BPA should develop and adopt formal guidance defining the conditions under which these factors and the subsequent grades are credited in the position classification and position management process. The guidance should include consideration of current and relevant precedents, BPA's history, legislation, congressional intent, current and future mission requirements, environmental realities, and financial and human resources, as we have provided here.

We suggest the following steps for BPA to consider. Items in italics, noting Avue support services are all covered and included in BPA's existing subscription agreement with Carahsoft+Avue. No additional fees or charges would be incurred.

- (1) Develop classification guidance documents regarding classification of nonsupervisory GS-14/15 positions at BPA. *[Avue can develop and deliver drafts and assist BPA in finalization and release.]*
- (2) Briefings to Managers and Executives on the guidance regarding classification of nonsupervisory GS-14/15 positions at BPA. *[Avue can develop and deliver these under BPA oversight.]*
- (3) Position Management Study
 - a. Online Desk Audits with identified employees and their managers. *[This functionality is in Avue today.]*
 - b. Documentation of position structure and creation of final position descriptions supporting the final classification. *[Avue would ensure inclusion of BPA classification policy and content in the Avue database.]*
 - c. Final job classification. *[BPA inherently governmental task.]*
 - d. Issuance of guides to managers regarding position description development and position classification.
- (4) Executive Position Management Review
 - a. Develop and issue guidance regarding the position management process and principles at BPA. *[Avue can develop and deliver drafts and assist BPA in finalization and release.]*
 - b. Consider the development of a BPA Position Management Governance Council to enforce implementation of BPA position management policies,

govern impacts on costs, and demonstrate compliance with sound position classification policies within the agency. *[Avue can develop and deliver drafts and assist BPA in finalization and release.]*

Attachment C includes sample position management and position classification guidance from two federal agencies, the Army Corps of Engineers and the Navy, as sample references.

Attachment A: Factor Level Comparison Chart

	Factor Level Descriptions OPM Appeal Decision #C-11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS-0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
FACTORS & LEVELS						
Knowledge Required						
1-8	Mastery of contracting methods and contract types to plan and administer long-term postaward procurement actions for major programs as defined in the GS-1102 standard. Monitoring systems contracts extending over several years, and covering research, development, testing, and/or production of complex equipment systems. Typical of this level, contracts require monitoring the performance of the prime contractor and a large number of subcontractors, negotiating forward pricing rates and claims, complex	Mastery of a major area of security specialization or demonstrated mastery of general security administration programs, use of comprehensive knowledge of security policy requirements to function as technical authorities in assignments requiring the application of new theories and developments to security problems not susceptible to treatment by accepted security methods, technology, or procedures. At this level, employees use knowledge of other security specialties in resolving major conflicts in policy and program objectives. May use knowledge at this level	Mastery of program principles, concepts, practices, methods, and techniques to apply new developments and theories to major problems not susceptible to treatment by accepted methods. At this level, the environmental protection specialist is recognized as an authority in a particular program or function. The work requires expert knowledge of Federal, State, and local laws and regulations, documentation and reporting requirements, and lawmaking or rulemaking processes sufficient to make decisions or recommendations	The supervisor makes assignments in terms of broadly defined missions or functions and provides only administrative and policy direction. As a recognized authority in a program or functional area, the environmental protection specialist has complete responsibility and authority to plan, design, schedule, and carry out major programs, projects, studies, or other work independently. The specialist typically exercises discretion and judgment in determining whether to broaden or narrow the scope of projects or studies. Completed work is reviewed	Environmental Engineer, GS-0819. Mastery of, and skill in applying, advanced theories, concepts, and principles sufficient to: - serve as an authoritative consultant and expert providing oversight, direction, and advisory services for the agency's national air quality enforcement program; - explain, interpret, and advise on agency policy and regulatory guidance, return on investment evaluations of new and existing pollution control plans for new plants, and proposed emission control methods for removing undesirable	Reserved for those few positions which require a mastery of public utilities principles, policies and theories. The position could be organizationally and functionally associated with a specialty area, or be a staff position in Power Management. The position must require that the specialist be able to go beyond the "hows" of the business practices and operations of utilities to the complex and often theoretical "whys."

	Factor Level Descriptions OPM Appeal Decision #C-11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS-0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
	changes, and terminations or contract close out.	to perform key decision-making and policy-development responsibilities in very difficult assignments such as planning for significantly new or far-reaching security program requirements or leading or participating as a technical expert in interagency study groups for resolving problems in existing security systems and programs requiring innovative solutions. Another example at this level is advising top level agency security and subject-matter managers on new developments and advances in security techniques in the specialty area; planning, organizing, and directing studies to develop long range studies and forecasts; recommending methods for enhancing efficiency of security systems through	significantly changing, interpreting, or expanding important agency/national policies and programs.	by management officials only for potential influence on broad agency policy and program goals, fulfillment of program objectives, or contribution to advancement of knowledge in the field, and is normally accepted without significant change	gases from flue effluent; - evaluate the effectiveness of air quality programs in controlling and reducing air pollutants from large stationary sources (e.g., coal, oil, or gas-fired power plants; petroleum refineries; smelters; asphalt, concrete, or cement plants) and advise on the need to devise new approaches, standards, and policies for enforcement of air quality controls; - conceive, conduct, direct, and advise on environmental engineering studies investigating, evaluating, and reporting on the status of compliance and abatement efforts; - explain, interpret, and promulgate agency decisions and	The position must require that this mastery be used to apply experimental theories and new developments to problems not susceptible to treatment by accepted methods. Also required for most positions at this level would the abilities to lead teams of specialists, professionals, and technicians involved in complex and important projects. This level of knowledge would usually be acquired through the education and experience at Level 1-7, PLUS several years of experience in an environment which

	Factor Level Descriptions OPM Appeal Decision #C-11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS-0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
		<p>modifications and applications of evolving technology; evaluating and making recommendations concerning overall plans and proposals for major agency and interagency security projects; and implementing national level guidance in agency standards, guidelines, or policies for major security programs.</p>			<p>determinations; and</p> <ul style="list-style-type: none"> - prepare, evaluate, and advise on complex air pollution and environmental engineering matters influencing current and future programs within the agency. <p>Civil Engineering, GS-810. Mastery of, and skill in applying, advanced theories, concepts, and principles practiced in the science of professional civil engineering sufficient to:</p> <ul style="list-style-type: none"> - serve as a project manager and authoritative consultant for remedial cleanup activities of agency properties contaminated with toxic and/or hazardous materials; - design, perform, oversee, 	<p>would allow the gradual assimilation of seasoning and insight necessary to gain mastery of a field.</p>

	Factor Level Descriptions OPM Appeal Decision #C- 11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS- 0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
					<p>advise on, and direct investigations, endangerment assessments, feasibility studies, and remedial action strategies for contamination cleanup programs at various agency sites;</p> <p>- evaluate and incorporate new applications and advanced theories, concepts, and practices of related engineering and architectural science disciplines (e.g., chemical, environmental, mechanical, and electrical), and physical science disciplines (e.g., chemistry and physics) involved in contamination cleanup and remediation work; and</p> <p>- advise, coordinate with, direct, and oversee the combined efforts of contractors and other Federal agencies involved in</p>	

	Factor Level Descriptions OPM Appeal Decision #C-11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS-0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
					remedial activities.	
Supervisory Controls						
2-4	Appeal decision did not discuss this factor, as it considered crediting the position with level 2-5 to be appropriate.	The supervisor sets the overall objectives and decides on the resources available. Employee consults with the supervisor in determining which projects to initiate, develops deadlines, and identifies staff and other resources required to carry out an assignment. The employee uses their expertise to plan and carry out the work resolving most of the conflicts that arise, integrating and coordinating the work of others as necessary, interpreting policy in terms of established objectives. The employee keeps the supervisor informed about	The supervisor sets the overall assignment objectives, program emphasis, and resources available. The environmental protection specialist and supervisor, in consultation, develop the deadlines, projects, and work to be done. The environmental protection specialist, having developed expertise in a particular program or functional area (e.g., municipal solid waste, land disposal, environmental information management), has continuing responsibility for independently planning and carrying out important environmental protection	How Work Is Assigned – The supervisor outlines overall objectives and available resources. The employee and supervisor, in consultation, discuss timeframes, scope of the assignment including possible stages, and possible approaches. Employee Responsibility – The employee: - determines the most appropriate principles, practices, and methods to apply in all phases of assignments, including the approach to be taken, degree of intensity, and depth of research in management advisories;	The supervisor outlines overall objectives and available resources. The employee and supervisor, in consultation, discuss timeframes, scope of the assignment including possible stages, and possible approaches. The employee is fully experienced in applying concepts and methodologies and is knowledgeable in functional program characteristics and requirements. The employee also is a technical authority. The employee keeps the supervisor informed of progress and of potentially controversial matters. The supervisor	The supervisor sets the overall objectives and the resources available to achieve expected results. The specialists are typically assigned a particular workload or type of project (e.g., residential weatherization through selected PUDs or a group of contracts to administer) for which they have continuing responsibility. Priorities, parameters, deadlines, etc., are usually formulated in consultation with the supervisor. The

	Factor Level Descriptions OPM Appeal Decision #C-11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS-0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
		<p>progress. Finished work is reviewed from an overall standpoint in terms of feasibility, compatibility with other program requirements, or effectiveness in meeting objectives and achieving expected results.</p>	<p>programs or projects; determining the approach to be taken and the methods to be used. The specialist keeps the supervisor informed of progress, potentially controversial matters, and problems with far-reaching implications. Completed work is reviewed for conformance to overall requirements, compatibility with other work, and effectiveness in meeting objectives.</p>	<p>- frequently interprets regulations on his/her own initiative, applies new methods to resolve complex and/or intricate, controversial, or unprecedented issues and problems, and resolves most of the conflicts that arise; and - keeps the supervisor informed of progress and of potentially controversial matters. How Work Is Reviewed – The supervisor reviews completed work for soundness of overall approach, effectiveness in meeting requirements or producing expected results, the feasibility of recommendations, and adherence to requirements. The supervisor does not usually review methods used. The</p>	<p>reviews completed work for soundness of overall approach, effectiveness in meeting requirements or expected results, the feasibility of recommendations and adherence to requirements. The supervisor does not usually review methods used.</p>	<p>specialist is responsible for planning and carrying out the assignment, resolving most conflicts, coordinating the work with others as necessary, and interpreting policy in terms of established objectives. In some assignments (e.g., preparing complex computed demand bills and developing new formulas for reconstructing and estimating missing billing data) the employee also determines the approach to be taken and the methods to be used. The specialist keeps the supervisor informed of progress, potentially controversial matters,</p>

	Factor Level Descriptions OPM Appeal Decision #C- 11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS- 0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
				supervisor outlines overall objectives and available resources. The employee and supervisor, in consultation, discuss timeframes, scope of the assignment including possible stages, and possible approaches.		and any far-reaching implications. Reports, contracts, proposals, etc., are relied upon for technical accuracy, but are reviewed from an overall standpoint for feasibility, compatibility with other work (both within and outside the specialty), and effectiveness in meeting requirements or expected results.
2-5		The supervisor provides broad administrative and policy direction through discussion of financial and program goals and national, agency, and local security policies affecting the program. Employee makes extensive unreviewed technical judgments concerning the interpretation and implementation of existing	The supervisor makes assignments in terms of broadly defined missions or functions and provides only administrative and policy direction. As a recognized authority in a program or functional area, the environmental protection specialist has complete responsibility and authority to plan, design, schedule, and carry out major	How Work Is Assigned – The supervisor provides administrative and policy direction in terms of broadly defined missions or functions of the agency. Employee Responsibility – The employee: - responsible for a significant agency or equivalent level IT program or function;	The supervisor provides administrative and policy direction in terms of broadly defined missions or functions of the organization. The employee is responsible for a significant program or function. The employee defines objectives, interprets policy promulgated by authorities senior to the immediate	The supervisor provides administrative direction with assignments in terms of broadly defined missions or functions. The specialist independently plans, designs, and leads or carries out public utilities programs or major projects

	Factor Level Descriptions OPM Appeal Decision #C-11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS-0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
		<p>security policy and in deciding which analytical and technical decisions lead to, or form the basis for, major security program policy and operational decisions by top management. Employee is regarded as the leading technical authority in a specialization, or over a wide range of interrelated security programs. The supervisor usually accepts the employee's recommendations without change.</p>	<p>programs, projects, studies, or other work independently. The specialist typically exercises discretion and judgment in determining whether to broaden or narrow the scope of projects or studies. Completed work is reviewed by management officials only for potential influence on broad agency policy and program goals, fulfillment of program objectives, or contribution to advancement of knowledge in the field, and is normally accepted without significant change. Recommendations for new projects or program objectives are usually evaluated for such considerations as availability of funds and other resources, broad program goals, or national priorities.</p>	<ul style="list-style-type: none"> - defines objectives; - interprets policies promulgated by authorities senior to the immediate supervisor and determines their effect on program needs; - independently plans, designs, and carries out the work to be done; and - is a technical authority. <p>How Work Is Reviewed – The supervisor:</p> <ul style="list-style-type: none"> - reviews work for potential impact on broad agency policy objectives and program goals; - normally accepts work as being technically authoritative; and - normally accepts work without significant change. 	<p>supervisor, and determines their effect on program needs. Additionally, the employee independently plans, designs, and carries out the work to be done. The employee is a technical authority. The supervisor usually evaluates the employee's recommendations for new systems, methods, projects, or program emphasis in light of the availability of funds, personnel, equipment capabilities, priorities, and available resources. Also, the supervisor rarely makes significant changes to the employee's work.</p>	<p>independently. Provides technical leadership' work results are considered as authoritative and are normally accepted without significant change. If the work is reviewed, focus is usually on matters such as fulfillment of program objectives, effect of advice and influence on overall BPA programs, or the contribution to the advancement of technology. Recommendations for changes in program direction (e.g., major revision in rate structures) or the initiation of new public utilities projects (an unprecedented conservation program for industrial</p>

	Factor Level Descriptions OPM Appeal Decision #C-11-1-14-01, GS-1101	Position Classification Standard for Security Administration Series, GS-0080	Job Family Standard for Environmental Protection Specialist, GS-0028	Job Family Standard for Administrative Work in the Information Technology Group (2210)	Job Family Standard for Professional Work in the Engineering and Architecture Group, (800)	BPA Classification Guide for Public Utilities Specialist, GS-1130
						<p>customers) would be accepted as technically sound, but evaluated for such considerations as availability of funds and other resources, public perception and acceptance, and relationship to broad program or BPA goals, or to national energy priorities. It would be very unusual, but possible for a Public Utilities Specialist to be allowed to operate with this degree of autonomy. This level describes administrative supervision only.</p>

Attachment B: Positions Affected

Last	First	MI	DeptID	Job Code	Position	Pay Basis	Off Title	Pay Plan	Occ Series	Grade
(b) (6)						PA	(b) (6)	GS	(b) (6)	14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GS		14
						PA		GM		15
						PA		GS		14

(b) (6)	PA		GS	(b) (6)	14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		15
	PA		GS		15
	PA		GS		15
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
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	PA		GS		15
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	PA		GS		15
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		15
	PA		GS		14
	PA		GS		14
	PA		GS		15
	PA		GS		14
	PA		GS		15

(b) (6)	PA	(b) (6)	GS	(b) (6)	14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		15
	PA		GS		14
	PA		GS		15
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
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	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		15
	PA		GS		14

(b) (6)	PA	(b) (6)	GS	(b) (6)	14
	PA		GS		15
	PA		GS		14
	PA		GS		15
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
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	PA		GS		15
	PA		GS		15
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		14
	PA		GS		15
	PA		GS		14

Attachment C: Examples of Position Management Policies

DEPARTMENT OF THE ARMY ER 690-1-500

U.S. Army Corps of Engineers

CEHR-E Washington, D.C. 20314-1000

Regulation

No. 690-1-500 31 July 2002

Civilian Personnel

POSITION MANAGEMENT AND CLASSIFICATION

Limited supplementation of this regulation is permitted with the prior approval

of this headquarters. If supplements are issued, Major Subordinate Command

(MSC) commanders and commanders of separate activities will furnish one copy to HQUSACE, CEHR-E, WASH, DC 20314-1000 for review and approval.

1. Purpose. This regulation provides human resources policy guidance, procedures, and criteria for the position management and classification program in the U.S. Army Corps of Engineers (USACE).

2. Applicability. This regulation is applicable to all HQUSACE elements, major subordinate commands (MSC), districts, laboratories, centers, and field operating activities (FOA).

3. Distribution. Approved for public release, distribution is unlimited.

4. References.

a. Classification Under the General Schedule, 5 CFR 511

b. Prevailing Rate Systems, 5 CFR 532

c. Reduction in Force, Competitive Level, 5 CFR 351.403

d. U.S. Office of Personnel Management, Introduction to the Position Classification Standards

e. Department of Defense Civilian Personnel Manual, Chapter 5, Classification and Human Resources Cost Management Program

5. Policy. It is the policy of the Commander, USACE that:

This regulation supersedes ER 690-1-500, 15 May 1996

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a. Civilian positions be structured so as to facilitate recruitment and retention of highly qualified individuals to effectively accomplish the mission in the most economical and efficient manner possible and make maximum use of employee skills. Consistent with this policy, managers and supervisors will assign duties in a manner that promotes maximum utilization of manpower resources with an effective and efficient organizational structure.

b. Formal position classification guidance and advice will be issued by the Director of Human Resources (HR), HQUSACE, in coordination with appropriate management officials. If a need for such advice or guidance exists, the Employment and Compensation Management Division (CEHR-E) should be consulted. Questions relating to job evaluation and grade structure will be referred to field MSC, Civilian Personnel Operations Center (CPOC), Civilian Personnel Advisory Center (CPAC) and HQUSACE HR officials. The final classification of positions will be determined consistent with Office of Personnel Management (OPM) Position Classification

Standards and guidance issued by OPM, the Department of Defense (DOD), the Department of the Army (HQDA), and HQUSACE by commanders and managers who have been delegated classification authority.

6. Responsibilities.

a. Headquarters USACE. The Commander, USACE, has delegated to the Director of Human Resources staff responsibility for the command position management and classification program. This includes providing staff oversight and assistance to HQUSACE, MSCs, districts, centers, laboratories, and activities reporting directly to HQUSACE on position management and classification matters, ensuring consistency in classification through periodic evaluation of position management and classification programs in coordination with the appropriate Major Command (MACOM) career program manager(s), and participating in HQDA surveys of USACE activities.

b. MSC Commanders. MSC Commanders will ensure that position management and classification programs in their headquarters and in districts and laboratories under their jurisdiction are properly administered and that job evaluations are made in conformance with prescribed standards and procedures. This will include disseminating position management and classification guidance, evaluation of position management and classification programs in subordinate activities, serving as a higher level classification review for district positions, including review and classification of individual cases referred by districts, and representing HQUSACE on HQDA and OPM human resources evaluation teams.

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c. Activity commanders and directors. Activity commanders and directors will ensure that performance objectives for all managers and supervisors are written in such a manner that effectiveness in accomplishing position management responsibilities can be clearly evaluated and that managers, supervisors, and other individuals delegated classification authority comply with all provisions of this regulation as well as the provisions of position classification standards.

d. Position Management Officer (PMO). The activity commander or director will serve as the PMO unless that individual chooses to delegate this responsibility. The authority may be

re delegated only to the military or civilian individual who is next in charge, normally a deputy. The PMO will make final decisions on position management recommendations and organizational structures where significant disagreements exist. The authority of the PMO does not extend to determinations on the classification of positions unless the PMO is the commander or director or is delegated classification authority.

e. Managers and Supervisors. Managers and supervisors will assure that job descriptions accurately reflect mission assignments and assure proper assignment of employees. With the assistance of human resource specialists at the CPAC and CPOC, they will maintain familiarity with classification standards covering the major functions under their supervision in order to classify the positions where they are delegated that authority and to understand and explain the basis for classification to subordinates. They will furnish job descriptions from the Position Description Library, FASCLASS, COREDOC, or other approved electronic sources with requests for personnel action. Where no description can be found, drafts of new or revised position descriptions may be submitted.

7. Position Classification. Authority to classify civilian positions in USACE is delegated to commanders and/or directors of major subordinate commands and activities reporting directly to HQUSACE. Major subordinate commanders may redelegate all or part of this authority to district commanders and laboratory directors. This authority may also be delegated to properly trained managers and supervisors. If classification authority is not delegated to managers or exercised by a commander, it must be delegated to and exercised by the servicing CPOC. When commanders, directors, or managers classify positions an advisory opinion will be provided by the servicing CPOC if needed. Such a classification advisory must be accepted unless the application of classification standards appears to support a different conclusion. Authority to override CPOC classification advisories is delegated to MSC commanders and the Director, Engineer Research and Development Center and may be re delegated to SES members who have classification authority and to district commanders, but not below that level. A copy of the position description, CPOC advisory, and rationale for the override will be provided to HQUSACE, ATTN: CEHR-E. An explanation of the interpretation of the position classification

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standards as applied to the position being evaluated will be prepared by the individual classifying the position if necessary. There is no authority to classify positions using factors not

included in the standards and deviations for other reasons are not authorized. It is noted that HQUSACE does not have the authority to classify foreign national positions. As this authority and associated procedures vary by country, the servicing human resources staff should be contacted for advice. Power Plant positions are not classified since the wage rates are set by individual positions. If new or revised power plant positions are needed, they should be requested through CEHR-E.

a. Prior approval requirements. The proposed establishment or revision of SES positions requires prior approval. CEHR-E should be contacted for guidance. The classification of Human Resources Officer positions must be approved one echelon above the organization where the position is located.

b. Evaluation decisions. In cases where there is significant controversy concerning the classification of a position or where a decision proves especially difficult, the commander may either request an evaluation decision from a higher echelon within the command or personally classify the position. Evaluation decisions made by higher echelon are binding unless the position changes substantially. A request for classification decision or for formal classification advice will not be made outside the chain of command. Neither DOD nor OPM will be asked for classification decisions or formal advice except by HQUSACE; however, they may be informally consulted.

c. Furnishing data. As a minimum, all cases submitted for prior approval or evaluation decision must include copies of the job description, evaluation statement, organization chart, mission and function statement, and such other job descriptions, evaluation statements, and program management information needed to make an informed decision. Submission of supervisory positions will include job descriptions for subordinate supervisors and for all nonsupervisory jobs used for base level determination.

d. Standard job descriptions, model job descriptions, FASCLASS, and Position Description (PD) Library. HQDA and HQUSACE have issued a number of standard and model job descriptions and many others are available in PD Library and FASCLASS. These are to be used without modification when they accurately describe the specific position as it is performed. They may also be modified to match specific jobs, but they will then be subject to more thorough review to assure that they remain properly classified. Existing job descriptions should be used whenever possible to minimize the number of new position descriptions.

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e. Competitive levels for interdisciplinary positions. Interdisciplinary positions must be assigned a separate competitive level for each series to which the position may be classified.

f. Special pay plan designators and job grading standards for USACE positions.

(1) Floating plant positions. OPM has identified separate pay plan codes for floating plant positions. Hopper dredge pay plan codes are WJ and WK. Pay plan codes for other than hopper dredges are XH, XG, and XF. Normally, the ladder diagram is used to classify supervisory and/or licensed marine employees on floating plant. The Department of the Army Manual of Evaluation Standards (DAMES), Part II and Section 6, are used to evaluate nonsupervisory and/or nonlicensed marine employees. Civilian Personnel Regulation (CPR) P42, Supplementary Job Evaluation Standards for Wage Board Jobs, Section I, Wage Board Supervisory Evaluation Standard, is used for supervisory positions performing work auxiliary to floating plant operations; e.g., revetment work, canal maintenance, or bank stabilization.

(2) Lock and dam operation and maintenance positions. OPM has established separate pay plan codes for lock and dam operation and maintenance positions. These are WY, WO, and WA. Regular Federal Wage System job grading standards are used to evaluate these positions.

(3) Power plant positions. The pay plan code (WB) is used for power plant positions. No standards are used to evaluate these positions as the pay rates are set for each position by the Department of Defense.

g. Recording special conditions on job descriptions.

(1) Job descriptions must clearly identify any prerequisites or special conditions required to do the job. For example, trainee jobs must clearly indicate that they are such and include the identity of the target position, and a requirement for professional registration must be included where appropriate. Information which would be helpful in filling the position should also be included as footnotes. Examples include requirements for financial statements, licensing, drug testing, designation as Automatic Data Processing (ADP) I, II, or III, acquisition corps requirements, and recurring or extended travel requirements, etc.

(2) Interdisciplinary positions must show "interdisciplinary" in the title block and contain the title, series, grade, and competitive level for each series to which they can be classified.

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8. Position Management. The CPAC is the proponent for advice and assistance on position

management. In accomplishing this function, that office is responsible for providing advice and assistance to management on the effective distribution of supervisory, professional, administrative, technical, clerical, and/or trades duties. Other aspects include advising on supervisory ratios, layering, duplication, and overlap. More specific position management guidelines to assist in carrying out this responsibility are at Appendix A.

a. Position management studies. When needed, managers and supervisors are responsible for conducting position management studies of organizations under their control with the assistance of their civilian personnel advisor. Efforts will also be made to include manpower, management analysis, and other appropriate support staff (e.g., activity career program managers) in conducting the studies.

b. Position management determinations. Final determination on implementation of position management recommendations will be made by the activity position management officer. This decision must be made based on valid mission requirements and include consideration of structures which would improve the efficiency of program operations.

9. Classification Appeals. There are two avenues for formal position classification appeals by General Schedule employees. They may appeal either to the Department of Defense (DOD) or directly to the Office of Personnel Management (OPM). Employees in positions exempt from

the Classification Act must appeal to DOD first unless the purpose of the appeal is to request classification of the position in the General Schedule. Appeal procedures for employees under the Laboratory Demonstration Project are covered by the Demonstration Plan.

a. Classification appeals to DOD or OPM. Classification appeals submitted to DOD will be addressed to the Defense Civilian Personnel Management Service, Field Advisory Services Division, 1400 Key Boulevard, Arlington, VA 22209-5144. Appeals to OPM will be forwarded to the OPM Service Center (or Central Office) serving the location of the servicing CPAC. They must be submitted within 30 days of the certification by the appellant and supervisor or the Commander that the job description is accurate or the date the appeal is filed with the servicing CPAC. The servicing CPAC will inform HQUSACE (CEHR-E), with a copy of the appeal memorandum, as soon as it is known that an employee has filed an appeal and will be provided a copy of any appeal decision.

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APPENDIX A ER 690-1-500

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U.S. ARMY CORPS OF ENGINEERS

POSITION MANAGEMENT GUIDELINES

This list of position management guidelines was compiled to assist in planning to meet high grade, supervisory ratio, and streamlining goals. It is not all inclusive, nor are all of the individual items applicable to every situation. They should, however, be considered

in all position management and individual action reviews.

A-1. Combine organizations when functions are related; and combine small, single function elements. Where small functions cannot be combined, the chief of the organization will not be classified as a supervisor unless that duty is performed at least 25 percent of the time.

A-2. Share administrative support between organizations.

A-3. Assure an efficient, streamlined organizational structure.

A-4. Assure that first line supervisors have an average of 12 subordinates to compensate for fewer at higher levels so that an average of no fewer than ten subordinates per supervisor at all levels can be achieved.

A-5. Review and reduce the number of deputy and assistant positions. Encourage empowerment of individual team members. Care should be exercised when establishing full time deputy positions. Generally, organizations of less than 40 employees do not warrant a full time deputy unless special circumstances exist. For example, an organization with 25 - 30 employees might need a deputy if there were no lower level supervisors.

A-6. Use team or project leaders instead of supervisors at levels below the chief of a function where possible. Leader positions should be designed so that 51 percent or more of the time is devoted to lead duties. (See footnote)

A-7. Concentrate higher graded duties in as few positions as is prudent, but assign some higher grade duties (less than 25%) to lower graded positions for broadening and developmental experience.

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A-8. Ensure that all positions perform at the grade level at which they are classified at least 50 percent of the time unless a smaller percentage is cost effective or more efficient.

A-9. Use technicians to support professional/administrative positions, assuring a reasonable balance of the two.

A-10. Assure that the balance of full performance and senior positions reflects the actual workload of the organization.

A-11. Take advantage of every attrition to review positions to assure conformity with organizational plans.

Footnote, item 6: A team leader is a permanent position where leader duties are performed at least 25 percent of the time. A project leader may be a temporary position or a position which leads teams created for a specific project.

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U.S. ARMY CORPS OF ENGINEERS

POSITION CLASSIFICATION GUIDES

These guides may be found at

<http://www.hq.usace.army.mil/cehr.htm>

B-1. Ladder Diagram of Floating Plant Jobs Evaluated Under the Department of the Army Wage Board Supervisory Standard, July, 1953.

B-2. Memorandum, CEPE-CP, First Installment of the Revised Floating Plant Ladder Diagram,

30 Jul 1987.

B-3. Letter, DAEN-PEC-P, Supplemental Classification Guidance for Positions Engaged in Research or Experimental Development, 4 Dec 1985.

B-4. Memorandum, DAEN-PEC-P, Classification Guidance for the Park Manager/Park Ranger GS-025 Series, 14 May 1986.

B-5. Memorandum, DAEN-PEC-P, Classification Guidance for Park Ranger Positions in the U.S. Army Corps of Engineers, 4 May 1987.

B-6. Letter, CECG, Clarification of Dual Track Classification Concepts, 11 Dec 1987.

B-7. Memorandum, CEHR-E/CESO-I, Supplemental Guidance on Hazard Pay Environmental Differentials Regarding Hazard Toxic Waste (HTW) Sites, 19 Oct 1990.

B-8. Memorandum, CEHR-E, Classification of Interdisciplinary Positions, 2 Feb 1993.

B-9. Memorandum, CEHR-E, Advisory Decision Pertaining to the Application of the Job Grading Standard for FWS Supervisors, 6 Apr 1993.

B-10. Memorandum, CEHR-E/CELD-MS, Implementing Instructions for Logistics Management Officers, 10 May 1994.

B-11. Memorandum, CEHR-E/CECW-O, Operations and Maintenance Management Positions,
16 June 1994.

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B-12. Memorandum, CEHR-E/CECW-O, Chief of Construction-Operations and Chief of Operations Positions, 1 September 1994.

B-13. Electronic message, Workforce Management Support Specialist, 15 August 1996.

B-14. Memorandum, CEHR-E Classification Consistency Review - District Chiefs of Information Management, 31 October 1996.

B-15. Memorandum, CEHR-E, Classification of Chiefs of Construction-Operations, Operations, and Planning and Engineering, 28 July 1997.

B-16. Memorandum, CEHR-E, Division Chief Auditor Positions - Model Position Description, 14 October 1997.

B-17. Memorandum, CEHR-E, Model Job Description for District Chief, Office of Safety and Occupational Health, 20 November 1997.

B-18. Memorandum, CEHR-E, Property Accountability Benchmark Job Descriptions,
23 December 1997.

B-19. Memorandum, CEHR-E, Classification Consistency Review - MSC Chief of Contracting Positions, 23 December 1997.

B-20. Memorandum, CEHR-E, Classification Consistency Review - MSC Director of Information Management (D/IM) Positions, 23 January 1998.

B-21. Memorandum, CEHR-ZE, Recruitment for Program Manager (GS-340 series,

6 February 1998

B-22. Memorandum, CEHR-E, Deputy for Programs and Project Management, 20 March 1998.

B-23. Memorandum, CEHR-E, Deputy for Programs and Project Management Positions,

29 May 1998.

B-24. Memorandum, CEHR-E, Application of the New General Schedule Leader Grade-Evaluation Guide, 10 June 1998.

B-25. Memorandum, CEHR-E, Programs and Project Management Positions, 7 July 1998.

B-26. Team Leader Addendum Update, 28 September 1998.

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B-27. Memorandum, CEHR-E, Second Revision of Implementing Instructions for the General Schedule Supervisory Guide, 4 September 1998.

B-28. Memorandum, CEHR-E, Combination of Planning and Program/Project Management Organizations, 21 December 1998.

B-29. Memorandum, CEHR-E, Job Description for Major Subordinate Command (MSC) Appeal Review Officer, 25 January 1999.

B-30. Memorandum, CEHR-E, Classification of Chiefs of Real Estate, 27 September 1999.

B-31. Memorandum, CEHR-E, Model Job Descriptions, Chief, Office of Small Business,
27 March 2000.

B-32. Memorandum, CEHR-E, Third Revision of Implementing Instructions for the General
Schedule Supervisory Guide (GSSG), 10 July 2000

B-33. Memorandum, CEHR-E/CECC-ZA/CERE-ZA, Revised Classification Guide for
Attorneys, 17 October 2000.

B-34. Memorandum, CEHR-E, Evaluation Guidance for Nonsupervisory MSC GS-14
Professional Positions, 16 February 2001.

B-35. Memorandum, CEHR-E, GS-14 Model Job Descriptions in Support of USACE
Operations and Planning Functions, 28 February 2001.

B-36. Memorandum, Template Job Descriptions for MSC Supervisory and Lead Positions,
9 March 2001.

B-37. Memorandum, District Level GS-13 Regional Specialists, 6 July 2001.

B-38. Memorandum, District Level GS-13 Regional Planning Specialists, 31 July 2001.

B-39. Memorandum, Civilian Personnel Centers (CPOCs) Advisory Classifications,
28 November 2001.

B-40. Memorandum, Inclusion of GS-808, Architects, and Appropriate Engineering Disciplines
When Classifying and Recruiting for Interdisciplinary Positions, 14 December 2001.

APPENDIX C

U. S. ARMY CORPS OF ENGINEERS

DELEGATION OF CLASSIFICATION AUTHORITY

C-1. Introduction.

C-1-1. Purpose. This document provides guidelines and instructions for the delegation and exercise of position classification authority within the U. S. Army Corps of Engineers (USACE).

C-1-2. Applicability. This guidance is applicable to all USACE elements, major subordinate commands (MSC), districts, and field operating activities (FOA). Elements of the Engineer Research and Development Center which are part of the Demonstration Project are not covered by this Appendix.

C-1-3. Exclusions.

a. The Department of Defense Wage Setting Division retains the authority to establish, change, or delete positions paid from regional power rate schedules. The guidelines contained in this regulation do not apply to power rate schedule positions.

b. This guidance does not apply to the classification of civilian personnel officer or SES positions. Guidance for the classification of these positions is contained under paragraph 6a, Prior Approval Requirements, page 4, of this regulation.

C-1-4. Lowest Practical Level. If commanders/activity directors delegate classification authority, that authority will be delegated to the lowest organizational level where skills, experience, knowledge, and flexibility exist for supervisors to make significant decisions affecting expenditure

of civilian personnel resources. At a minimum, authority should be delegated to the first level below the command group. Delegations must follow the chain-of-command and should be reviewed annually. Commanders/activity directors retain the discretion to subsequently withdraw authorities and redelegate to higher levels than previously delegated, consistent with changing mission requirements and availability of funds. Authorities must be delegated in writing.

C-2. Authorities.

C-2-1. Position Classification. Authority for the conduct of civilian personnel matters, including position management and classification, has been delegated to MSC and district commanders and directors of field operating activities. This includes the authority to classify civilian positions in accordance with controlling statutory and regulatory guidelines.

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C-2-2. Redlegation of Authority. MSC and district commanders and directors of field operating activities may redelegate this authority to managers and supervisors under their direct supervision.

Classification authority may not be delegated to contractors.

C-2-3. Training. Military and civilian supervisors, including directors and senior managers, must be trained and oriented on all position classification authorities and responsibilities prior to delegation of authority. Training will be scheduled and conducted on a periodic basis to assure that all supervisors have the opportunity to attend. Supervisors will not be delegated position classification authority until they have completed appropriate training.

C-2-4 The exercise of position classification authority by managers and supervisors must be in accordance with controlling statutory and regulatory guidelines. Should commanders/directors choose not to delegate position classification authority, the authority to classify civilian positions

may be redelegated to the appropriate servicing civilian personnel operations center or retained by the commander/director.

C-2-5. **Withdrawal of Authority.** When an internal or external review reveals serious deficiencies in position classification, all or any part of the authority may be withdrawn. During the period of withdrawal of authority, the higher headquarters will take such measures as are necessary to remedy the deficiencies noted. Redlegation of authority will be made when the higher headquarters commander is satisfied that the responsible official of the activity has developed and implemented corrective measures for the proper exercise of job evaluation authority.

C-3. **Responsibilities. MSCs/District/Field Operating Activities.**

a. If commanders/activity directors delegate classification authority, they will:

- (1) Delegate and exercise position classification authority in accordance with the guidelines contained in this document.
- (2) Assure accountability is properly established for position classification.
- (3) Take appropriate action to correct any abuse or misapplication of position classification.
- (4) Assure obligations to recognized labor organizations, as required by 5 U.S.C. Chapter 71, are fully met.

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b. The Civilian Personnel Operations Center (CPOC) will:

(1) Provide classification advisories to assist supervisors in the application of OPM position classification standards and job grading standards.

(2) Provide periodic feedback to the commander/activity director, or the commander/activity director's designee, on trends in position classification. Feedback will include recommendations for corrective action, as required.

c. The Civilian Personnel Advisory Center (CPAC) will:

(1) Provide continuing advice and guidance to the commander and supervisors consistent with OPM, DOD, HQDA, and HQUSACE requirements, regarding execution of the classification program.

(2) Provide advice and assistance on modifying supervisory performance standards/Officer Evaluation Report duty descriptions and performance objectives to reflect accountability for position classification authorities.

(3) Coordinate training and orientation for the commander and supervisors on position management and classification, requesting CPOC assistance if needed.

d. Managers/supervisors will:

(1) Correctly classify positions in accordance with appropriate position classification standards, giving full consideration to CPOC classification advisories.

(2) Fulfill responsibilities to recognized labor organizations under 5 U.S.C. Chapter 71 and appropriate negotiated agreements.

(3) Explain to employees the reasons for the classification of their positions and advise them of their appeal rights if requested.

C-4. Position Management and Classification.

C-4-1. General.

a. Delegation of position classification authority enhances the personnel management function and accountability of line supervisors by providing maximum control over the grades and

position structure of their organizations consistent with classification policies and standards. In addition, this delegation increases supervisors' knowledge of the classification system and makes the system more responsive to the needs of management.

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b. A key principle of delegation of position classification authority is that the supervisor's authority does not exceed that of the commander/activity director. Classification standards still govern and prior decisions by OPM, DOD, HQDA, and HQUSACE on substantially identical, similar or, related positions may not be overruled.

C-4-2. Accountability.

a. The commander/activity director is ultimately responsible for the integrity of the position classification program. Commanders/activity directors are expected to ensure procedures are in place which will keep them aware of trends and special circumstances associated with classification decisions by subordinate supervisors, particularly those cases which may (1) be precedent setting in nature, (2) result in inconsistent grading when compared to substantially identical positions in the organization, or (3) disrupt sound alignment of grades. Precedent setting cases should be discussed with the commanders/director peers if there may be an impact on other commands. Failure to conform with legal and regulatory requirements may result in withdrawal of the commander/activity director's position classification authority.

b. Performance objectives of civilian and military supervisors will reflect the accountability which is inherent in the delegation of position classification authority. For civilian supervisors, position classification authority will be included in the performance objectives. For military supervisors, classification authority will be included in the duty description in the Officer Efficiency Report (OER) and the OER Support Form. In rendering performance appraisals and OERs, raters will give full consideration to the performance of supervisors in exercising

classification authority.

C-4-3. Requirements.

a. Supervisors will complete appropriate training for position classification and position management comparable to the HQDA program of instruction for position management skills and principles (basic position classification), prior to being delegated position classification authority.

b. Supervisors may not classify their own position. Classification of subordinate positions which will result in an upgrade of the supervisor's position must be approved by an appropriate official at a higher level in the chain of command.

c. Classification authority will be delegated to a supervisor by name. The delegation letter should outline specific budget, classification, statutory and regulatory responsibilities. A sample is included as an attachment.

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C-4-4. Procedures. Supervisors are encouraged to consult informally with CPAC/CPOC

specialists to discuss organization and position structures and other position management, classification, and personnel issues prior to submission of requests for personnel action.

a. Supervisors with delegated classification authority should follow procedures established locally or by the servicing CPOC when submitting requests for position classification actions. The CPOC will provide advisory position classification determinations which give the title, series, and grade for the position in situations where further consideration by commanders or managers is needed.

b. Disagreements on the content of proposed job descriptions will be resolved within the management chain. Commanders/activity directors retain final decision-making authority for actions which cannot be resolved between the CPOC and managers/supervisors. This authority may be re-delegated to one principal assistant with full line authority to discharge their functions

on a district/field activity wide basis.

c. The CPOC will determine eligibility for environmental differential, hazard pay differential, and other premium pay and will determine Fair Labor Standards Act (FLSA) designation, assign competitive levels and maintain registers, and accomplish other administrative tasks associated with the processing of classification actions.

C-4-5. Withdrawal of authority.

a. Classification authority may be withdrawn where serious program deficiencies are identified and remain uncorrected. A corrective plan of action must be approved by MSCs for districts, and HQUSACE for MSCs and field activities. If authority is withdrawn, the corrective plan of action must be implemented prior to having authority restored. The plan of action must require re-training of supervisors prior to restoration of classification authority. Restoration of authority will be granted upon receipt of findings which indicate deficiencies have been corrected. The servicing CPOC will be immediately notified if classification authority is withdrawn from a command or activity and when it is restored.

b. MSC/District/Field Operating Activities. Periodically, commanders should compare current data with baseline program data to develop trend lines for future program assessment of position management and classification. Trends and statistical data should be periodically updated. It is expected that trends will show a regular pattern of fluctuation due to the nature of the mission of the Corps. These normal fluctuations should not require further investigation. Marked or sharp increases and decreases warrant further study but are not absolute indicators of program deficiencies.

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Sample Delegation Memorandum

OFFICE SYMBOL DATE

MEMORANDUM FOR (Division or Office Chief, etc.)

SUBJECT: Delegation of Position Classification Authority

1. You are authorized to classify civilian positions under your supervisory control to the appropriate pay plan, title, series, and grade. This delegation carries with it the responsibility to assure that all such classifications made by you are in accordance with Title 5, U.S. Code, governing Office of Personnel Management (OPM) position classification standards, Department of the Army (DA) and HQUSACE classification guidance, and OPM, DA or higher echelon decisions resulting from appeals and advisories. This authority does not extend to your own position. In addition, classification of subordinate positions that would result in an increase to your own grade must be approved by your supervisor.

2. Your performance evaluation will reflect your responsibility for executing position classification and budget authority.

3. This delegation of authorities is effective . It will be terminated if you leave your position, if you fail to execute this authority properly, or as required by the annual funding situation, or other extenuating circumstances.

COMMANDER'S SIGNATURE BLOCK

C-6



DEPARTMENT OF THE NAVY

NAVY RECRUITING COMMAND

5722 INTEGRITY DR.

MILLINGTON, TN 38054-5057

COMNAVCRUITCOMINST 5310.1B

N12

13 May 2009

COMNAVCRUITCOM INSTRUCTION 5310.1B

From: Commander, Navy Recruiting Command

Subj: POSITION MANAGEMENT PROGRAM

Encl: (1) Position Management Guidance
(2) Position Management Evaluation, NAVCRUIT 5310/2
(3) Position Management Checklist

1. Purpose. To establish an effective Position Management Program within Navy Recruiting Command.

2. Cancellation. COMNAVCRUITCOM Instruction 5310.1A.

3. Scope. This instruction applies to the organizational structuring of total force manpower billets that includes military, civilians, and contractors. The Position Management Board (PMB) was established to review requested modifications to all types of currently established billets/positions, requests for additional federal service civilian positions/personnel and requests for additional contract positions within NAVCRUITCOM. All requests to convert a "non-supervisory" position to a "supervisory" position will be reviewed by the PMB to address issues related to supervisory/employee ratios, supervisory layering, etc. The management of civilian positions shall be responsive to the needs, policies, and goals of the command. The PMB is set up to review and make recommendations on position management as related to authorized levels of resources for civilian positions.

(R)

4. Policy. The policy of this command is to ensure the most cost effective use of manpower, and to vigorously pursue a Position Management (PM) Program. Position utilization and organizational structures will be compatible with and support equal opportunity programs. The BUPERS High Level Review Board will exercise approval authority over civilian positions classified as Pay Band 3 under the National Security Personnel System (NSPS).

5. Objectives. The objectives of the NAVCRUITCOM PM Program are as follows:

a. Establish a billet/position structure that will best serve missions and functions by providing optimum balance, retention, and motivation of competent personnel.

b. Avoid billet/position actions that will unnecessarily increase payroll costs for a given mission, or will increase the relative proportion of managerial and supervisory positions to total subordinate personnel assigned.

c. Ensure billets/positions authorized are required and are used in the most effective and efficient manner to accomplish assigned functions.

d. Eliminate, upon vacancy, those billets/positions when the duties can be redistributed, eliminated, or reduced in cost without seriously affecting the accomplishment of essential functions.

e. Ensure the duties and responsibilities of billets/positions are clearly delineated and do not conflict with or duplicate the duties of other billets/positions.

f. Prevent or eliminate such common organizational faults as unnecessary fragmentation of functions, grade accretion, continued use of outmoded work methods, and inefficient distribution of manpower.

6. Responsibilities

a. Managers. Accountability is required from managers at all organizational levels through direct involvement in the PM Program process. Enclosure (1) is a guide to acceptable position management criteria and processes to be used command wide. (R)

b. First Level Supervisor. The First Level Supervisor shall: (R)

(1) Ensure the effective and efficient structure of assigned billets/positions and the accuracy of civilian Position Descriptions (PDs). The supervisor's certification on the PD cover sheet (Optional Form-8 or DD Form 2918) indicates this

responsibility. Consideration should be given to the organizational structure; and the number, types, and pay bands of positions required to accomplish the mission within the assigned Full Time Equivalency (FTE) and funding target constraints.

(2) Prepare PM packets for review by the PMB per this instruction's submission criteria. It is the supervisor's responsibility to ensure all required forms and documentation are properly prepared, justification supports the PM request, and accurate Billet Identification Numbers (BINs) and Billet Sequence Codes (BSC's) are identified for funding offsets.

(R)

(3) Submit PM packets through the chain of command for appropriate endorsement prior to submission to N12 and in sufficient time to ensure timely receipt by N12 per this instruction.

(R)

c. Position Management Officer (PMO). The Director, Civilian Human Resources Liaison Division, N12, is designated as PMO. The PMO shall:

(1) Develop and administer the PM Program and serve as the primary advisor within NAVCRUITCOM on all civilian personnel matters. Maintain close coordination with the NAVCRUITCOM Comptroller and the servicing Human Resource Office (HRO).

(2) Review all Requests for Personnel Action (RPA) to determine the concordance of the action on approved or planned position management studies/reviews and other management actions; ascertain the requested action is within FTE target constraints; ensure the requested action complies with position management and management engineering standards; and determine if the requested action should be reviewed by the PMB. The PMO will distribute packets via email to PMB members with all documentation for review prior to convening the PMB each month; and ensure all required paperwork is forwarded through the proper HR channels for processing of any final actions approved by the PMB for implementation.

(3) Maintain complete position management records.

(4) Ensure changes approved by position management reviews and evaluations are implemented.

(5) Evaluate the effectiveness of the PM Program and direct corrective action where appropriate.

(6) Convene special meetings of the PMB as needed. Minutes from meetings will be recorded and kept on file by the PMO.

(7) Conduct position management reviews and studies to ensure program compliance. The PM Program is directed toward the control and utilization of appropriated funded civilian positions. Related military billets and/or contractor requirements will be considered during position management reviews and studies.

(8) Maintain coordination with the military manpower analyst and contract employee coordinator to stay abreast of such requirements and avoid possible overlap of functions.

(R)

d. PMB. Shall review all requests submitted per the procedures set forth in this instruction to determine validity of request and approve or disapprove requested action. The PMB shall convene monthly or as directed by the chairperson. A review of civilian recruitment activity as reflected on the command's Current and Aged Vacancy Report will be conducted monthly during the PMB meeting. The chairperson will determine if a quorum exists to convene the PMB. The PMB is responsible for ensuring the review process and the decision to approve or disapprove requests submitted for consideration are based on NAVCRUITCOM mission needs and sound management principles. The PMB shall consist of the following:

- (1) Deputy, Navy Recruiting Command - Chairperson
- (2) Chief of Staff - Voting Member
- (3) Department Heads - Voting Members
- (4) PMO - Facilitator/Advisor
- (5) Special Assistants (as required) - Advisors
- (6) Equal Employment Opportunity Officer - Advisor
- (7) Recorder (provided by PMO)

7. Action. Region Commanders, Department Heads, Special Assistants, and District Commanding Officers will:

a. Provide to the PMO, in writing for appropriate staffing and/or action, full justification for all requests to establish, increase or decrease level of responsibility (i.e. rate of pay; fill vacancies; and reassign or change the organization and/or duties in existing positions.

b. Ensure the use of temporary hires is predicated on either unexpected work requirements, authorized absence of permanent personnel for short durations, or an unprogrammed new mission requirement that cannot be accomplished by current personnel assets. If the proposed duties are such that they will be regular or recurring, the use of temporary hires will not be authorized.

c. Ensure supporting documentation for position management actions requiring review/approval by the PMB are submitted to the PMO no later than five working days in advance of the scheduled board meeting. Requests received after the deadline or with incomplete required documentation will be reviewed at the next regularly scheduled PMB.

8. Procedures. Requests will be submitted to the PMO, N12, with the following:

- a. Position Management Evaluation NAVCRUIT 5310/2
- b. Copy of Position Management Checklist (Enclosure (3))
- c. Copy of current PD (for civilian positions)
- d. Copy of Statement of Work (SOW) (for contract positions)
- e. Original of proposed PD (including DD 2918) with appropriate signatures
- f. Copy of current and proposed Organizational Chart(s) and Functional Statements
- g. Original Request for Personnel Action (RPA) with appropriate signatures
- h. Memo prioritizing multiple submissions if more than one issue is presented for review

(R)

- i. Copy of manpower listing
9. Forms:
- a. RPA is a Standard Form 52.
 - b. Position Management Evaluation, Supervisor's Evaluation is NAVCRUIT 5310/2 (sample enclosure (2)).
10. Point of Contact. For questions or assistance, please contact the Director, Civilian Human Resources Liaison Division, N12, at (901) 874-9179.

/s/
R. R. BRAUN
Deputy

Distribution:
Electronic only, via
<http://www.cnrc.navy.mil/Publications/directives.htm>

Position Management Guidance

1. Considerations in Billet/Position Structuring. The material below identifies items to consider when designing billet/position structures and/or when performing a PM evaluation.

a. Consider all available sources of manpower when structuring organizations. Activities accomplish workload through a combination of military, civilian, and contractor personnel efforts. Ensure assignments of workload to civilian positions are commensurate with the overall structure of the organizational unit. Do not shift workload from military billets to civilian positions when appropriate military skills and capability exists. Civilian positions, duties, and responsibilities should not conflict with contractor efforts. Military billets and civilian positions used in monitoring or evaluating contractor performance should be kept at a minimum.

b. Ensure a sound and economical proportion of managerial and supervisory positions to non-supervisory positions. Keep the number of managerial and supervisory positions in each segment to a minimum - no more than what is actually required to plan work, check performance, and give guidance on unusual assignments. The number of levels of supervision should be kept to a minimum. Use experienced staff members to provide technical supervision for trainees.

c. Ensure a balanced proportion of senior, journeyman, junior, technician, and support positions. Maintain a proportion that is closely related to the frequency with which tasks calling for skills of each type occur in the organization's normal workload.

d. Ensure a reasonable relationship between the numbers of trainees and juniors and the estimated replacement needs for journeyman and seniors. In setting this relationship, predictable retirements, resignations and transfers, loss of experience, expansion needs, the availability of trained replacements in the labor market, and the training time required to achieve journeyman and senior performance should be taken into account as well as deletion of duties.

e. Ensure a clear delineation of work assignments and job-to-job relationships. Overlaps, conflicts, unnecessary organizational fragmentation, and ambiguities should be avoided. Duties assigned to positions should be consistent with the

functions assigned to the organization in the command's organization manual.

f. Ensure clear justification for full-time deputy or assistant positions. Assistant positions should not be established when the span of control over subordinate positions allows the principal time to perform such duties. Generally, an assistant position is readily combined with a second position, most frequently the position of head of a major subordinate unit. A deputy is responsible for the entire authority of the principal billet/position, except as otherwise delineated by the principal. Deputies are not to be established for the sole purpose of "continuity," civilian affairs, etc. The deputy is expected to assist in managerial decisions/interface based on present or future considerations, and is not expected to relieve the principal of required managerial accountability.

g. Ensure well-defined career ladders for those occupations, which provide candidates for key positions in the organization. Such ladders need not be completely within the organization itself if opportunity exists for rotation among other codes.

h. The majority (51 percent) of the work of a position should be equal to the salary range (i.e., level of responsibility) within the pay band of the position.

(R

i. Higher level responsibilities should be concentrated in the smallest possible number of positions.

POSITION MANAGEMENT EVALUATION

From: (Request's Name, Title and Organization)

To: Position Management Officer (N12)

Organization Location:

Proposed Position Title/Series/Pay
Band/Salary Range:

APPLICATION OF POSITION MANAGEMENT STANDARDS

Rationale for establishing New or Revised Position:

- New functions or responsibilities (explain and state authority in remarks).
- Organization change (attach before and after charts).
- Addition of supervisory duties (state in remarks why necessary and what is supervisory ration).
- Other (specify in remarks, e.g. reestablishment for recruiting, amendment, application of new standard, etc.)

Remarks:

Source of Duties and Responsibilities:

Impact on Military and Civilian Interface, if any. (Ensure clear justification for full-time Deputy or "Assistant to" position.)

APPLICATION OF POSITION MANAGEMENT STANDARDS (Continued)

Source of FTE for Position (Identify BIN and BSC as appropriate)::

Source of Funding for Position (Identify BIN and BSC as appropriate)::

Requesting Official's Typed Name
and Title: (Commanding Officer,
Region Commander, Department Head,
Deputy, or Supervisor)

Signature:

Date:

DEPARTMENT HEAD/REGION COMMANDER ENDORSEMENT

Recommendation:

Approved. Disapproved.

Comments:

Typed Name and Title:

Signature:

Date:

COMPTROLLER'S ENDORSEMENT

Recommendation:

Approved. Disapproved.

Comments:

Typed Name and Title:

Signature:

Date:

POSITION MANAGEMENT BOARD CHAIR ENDORSEMENT

Recommendation:

Approved. Disapproved.

Comments:

Chairperson, Position Management
Board:

Signature:

Date:

APPLICATION OF POSITION MANAGEMENT STANDARDS (Continued)

Position Management Officer Endorsement

Comments:

Typed Name and Title:

Signature:

Date:

Submit original plus one copy of this request and the following:

- | | |
|--|--|
| (1) Position Management Checklist (encl (3) | (5) Original RPA |
| (2) Current PD or SOW | (6) Memo prioritizing multiple submissions |
| (3) Proposed PD (including DD 2918) | (7) Copy of Manpower listing |
| (4) Current and proposed organizational charts and functional statements | |

Position Management Checklist

TO ACCOMPANY THE POSITION MANAGEMENT EVALUATION FOR ALL REQUESTS TO RECRUIT, REDESCRIBE, IDENTIFY A HIGHER LEVEL OF RESPONSIBILITY, OR ESTABLISH NEW POSITIONS. (PLEASE ANSWER QUESTIONS COMPLETELY, ADDITIONAL PAGES MAY BE ADDED AS NEEDED.)

1. Is this a managerial position? Yes No
2. Is this position critical to the assigned mission of the organization?
 Yes No
3. Are the presently described duties of the position compatible with the assigned mission of the organization? Yes No
4. Are there other positions within the specific work area that are performing similar work? Yes No If yes, provide the following for each:

<u>BIN/BSC</u>	<u>Position Title</u>	<u>Series/Pay Band</u>	<u>Name (If encumbered)</u>
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5. Can these duties be reallocated to other civilian or military personnel?
 Yes No If not, provide brief justification.
6. Is the position being recruited for at the lowest entry level? Yes
 No If not, provide brief justification.
7. If this request is to re-describe, reclassify, identify a higher level of responsibility, or establish a new position; complete the following.
 - a. What responsibilities or duties have changed that warrant this request?
 - b. What changes in policy, program, or operations required change in the duties and responsibilities of this position?
 - c. Who tasked or where did the additional duties originate?
 - d. What other options were considered?
 - e. Identify vacant position(s) that could be used to offset this new position/increase in salary range:

<u>BIN/BSC</u>	<u>Position Title/Series/Pay Band</u>
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DEPARTMENT OF THE NAVY

NAVY RECRUITING COMMAND

5722 INTEGRITY DR.

MILLINGTON, TN 38054-5057

COMNAVCRUITCOMINST 5310.1B

N12

13 May 2009

COMNAVCRUITCOM INSTRUCTION 5310.1B

From: Commander, Navy Recruiting Command

Subj: POSITION MANAGEMENT PROGRAM

Encl: (1) Position Management Guidance
(2) Position Management Evaluation, NAVCRUIT 5310/2
(3) Position Management Checklist

1. Purpose. To establish an effective Position Management Program within Navy Recruiting Command.

2. Cancellation. COMNAVCRUITCOM Instruction 5310.1A.

3. Scope. This instruction applies to the organizational structuring of total force manpower billets that includes military, civilians, and contractors. The Position Management Board (PMB) was established to review requested modifications to all types of currently established billets/positions, requests for additional federal service civilian positions/personnel and requests for additional contract positions within NAVCRUITCOM. All requests to convert a "non-supervisory" position to a "supervisory" position will be reviewed by the PMB to address issues related to supervisory/employee ratios, supervisory layering, etc. The management of civilian positions shall be responsive to the needs, policies, and goals of the command. The PMB is set up to review and make recommendations on position management as related to authorized levels of resources for civilian positions.

(R)

4. Policy. The policy of this command is to ensure the most cost effective use of manpower, and to vigorously pursue a Position Management (PM) Program. Position utilization and organizational structures will be compatible with and support equal opportunity programs. The BUPERS High Level Review Board will exercise approval authority over civilian positions classified as Pay Band 3 under the National Security Personnel System (NSPS).

5. Objectives. The objectives of the NAVCRUITCOM PM Program are as follows:

a. Establish a billet/position structure that will best serve missions and functions by providing optimum balance, retention, and motivation of competent personnel.

b. Avoid billet/position actions that will unnecessarily increase payroll costs for a given mission, or will increase the relative proportion of managerial and supervisory positions to total subordinate personnel assigned.

c. Ensure billets/positions authorized are required and are used in the most effective and efficient manner to accomplish assigned functions.

d. Eliminate, upon vacancy, those billets/positions when the duties can be redistributed, eliminated, or reduced in cost without seriously affecting the accomplishment of essential functions.

e. Ensure the duties and responsibilities of billets/positions are clearly delineated and do not conflict with or duplicate the duties of other billets/positions.

f. Prevent or eliminate such common organizational faults as unnecessary fragmentation of functions, grade accretion, continued use of outmoded work methods, and inefficient distribution of manpower.

6. Responsibilities

a. Managers. Accountability is required from managers at all organizational levels through direct involvement in the PM Program process. Enclosure (1) is a guide to acceptable position management criteria and processes to be used command wide. (R)

b. First Level Supervisor. The First Level Supervisor shall: (R)

(1) Ensure the effective and efficient structure of assigned billets/positions and the accuracy of civilian Position Descriptions (PDs). The supervisor's certification on the PD cover sheet (Optional Form-8 or DD Form 2918) indicates this

responsibility. Consideration should be given to the organizational structure; and the number, types, and pay bands of positions required to accomplish the mission within the assigned Full Time Equivalency (FTE) and funding target constraints.

(2) Prepare PM packets for review by the PMB per this instruction's submission criteria. It is the supervisor's responsibility to ensure all required forms and documentation are properly prepared, justification supports the PM request, and accurate Billet Identification Numbers (BINs) and Billet Sequence Codes (BSC's) are identified for funding offsets.

(R)

(3) Submit PM packets through the chain of command for appropriate endorsement prior to submission to N12 and in sufficient time to ensure timely receipt by N12 per this instruction.

(R)

c. Position Management Officer (PMO). The Director, Civilian Human Resources Liaison Division, N12, is designated as PMO. The PMO shall:

(1) Develop and administer the PM Program and serve as the primary advisor within NAVCRUITCOM on all civilian personnel matters. Maintain close coordination with the NAVCRUITCOM Comptroller and the servicing Human Resource Office (HRO).

(2) Review all Requests for Personnel Action (RPA) to determine the concordance of the action on approved or planned position management studies/reviews and other management actions; ascertain the requested action is within FTE target constraints; ensure the requested action complies with position management and management engineering standards; and determine if the requested action should be reviewed by the PMB. The PMO will distribute packets via email to PMB members with all documentation for review prior to convening the PMB each month; and ensure all required paperwork is forwarded through the proper HR channels for processing of any final actions approved by the PMB for implementation.

(3) Maintain complete position management records.

(4) Ensure changes approved by position management reviews and evaluations are implemented.

(5) Evaluate the effectiveness of the PM Program and direct corrective action where appropriate.

(6) Convene special meetings of the PMB as needed. Minutes from meetings will be recorded and kept on file by the PMO.

(7) Conduct position management reviews and studies to ensure program compliance. The PM Program is directed toward the control and utilization of appropriated funded civilian positions. Related military billets and/or contractor requirements will be considered during position management reviews and studies.

(8) Maintain coordination with the military manpower analyst and contract employee coordinator to stay abreast of such requirements and avoid possible overlap of functions.

(R)

d. PMB. Shall review all requests submitted per the procedures set forth in this instruction to determine validity of request and approve or disapprove requested action. The PMB shall convene monthly or as directed by the chairperson. A review of civilian recruitment activity as reflected on the command's Current and Aged Vacancy Report will be conducted monthly during the PMB meeting. The chairperson will determine if a quorum exists to convene the PMB. The PMB is responsible for ensuring the review process and the decision to approve or disapprove requests submitted for consideration are based on NAVCRUITCOM mission needs and sound management principles. The PMB shall consist of the following:

- (1) Deputy, Navy Recruiting Command - Chairperson
- (2) Chief of Staff - Voting Member
- (3) Department Heads - Voting Members
- (4) PMO - Facilitator/Advisor
- (5) Special Assistants (as required) - Advisors
- (6) Equal Employment Opportunity Officer - Advisor
- (7) Recorder (provided by PMO)

7. Action. Region Commanders, Department Heads, Special Assistants, and District Commanding Officers will:

a. Provide to the PMO, in writing for appropriate staffing and/or action, full justification for all requests to establish, increase or decrease level of responsibility (i.e. rate of pay; fill vacancies; and reassign or change the organization and/or duties in existing positions.

b. Ensure the use of temporary hires is predicated on either unexpected work requirements, authorized absence of permanent personnel for short durations, or an unprogrammed new mission requirement that cannot be accomplished by current personnel assets. If the proposed duties are such that they will be regular or recurring, the use of temporary hires will not be authorized.

c. Ensure supporting documentation for position management actions requiring review/approval by the PMB are submitted to the PMO no later than five working days in advance of the scheduled board meeting. Requests received after the deadline or with incomplete required documentation will be reviewed at the next regularly scheduled PMB.

8. Procedures. Requests will be submitted to the PMO, N12, with the following:

- a. Position Management Evaluation NAVCRUIT 5310/2
- b. Copy of Position Management Checklist (Enclosure (3))
- c. Copy of current PD (for civilian positions)
- d. Copy of Statement of Work (SOW) (for contract positions)
- e. Original of proposed PD (including DD 2918) with appropriate signatures
- f. Copy of current and proposed Organizational Chart(s) and Functional Statements
- g. Original Request for Personnel Action (RPA) with appropriate signatures
- h. Memo prioritizing multiple submissions if more than one issue is presented for review

(R)

- i. Copy of manpower listing
9. Forms:
- a. RPA is a Standard Form 52.
 - b. Position Management Evaluation, Supervisor's Evaluation is NAVCRUIT 5310/2 (sample enclosure (2)).
10. Point of Contact. For questions or assistance, please contact the Director, Civilian Human Resources Liaison Division, N12, at (901) 874-9179.

/s/
R. R. BRAUN
Deputy

Distribution:
Electronic only, via
<http://www.cnrc.navy.mil/Publications/directives.htm>

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Signature:

Date:

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Recommendation:

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Comments:

Typed Name and Title:

Signature:

Date:

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Recommendation:

Approved. Disapproved.

Comments:

Typed Name and Title:

Signature:

Date:

POSITION MANAGEMENT BOARD CHAIR ENDORSEMENT

Recommendation:

Approved. Disapproved.

Comments:

Chairperson, Position Management
Board:

Signature:

Date:

APPLICATION OF POSITION MANAGEMENT STANDARDS (Continued)

Position Management Officer Endorsement

Comments:

Typed Name and Title:

Signature:

Date:

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