

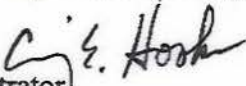




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DEC 20 2010

**MEMORANDUM**

**SUBJECT:** Response to OIG Final Report "EPA's Revised Hiring Process Needs Additional Improvements" Report Number 10-P-0177

**FROM:** Craig E. Hooks   
Assistant Administrator  
Office of Administration and Resources Management

Barbara Bennett   
Chief Financial Officer  
Malcolm D. Jackson   
Assistant Administrator  
Office of Environmental Information

**TO:** Arthur A. Elkins, Jr.  
Inspector General

The purpose of this memorandum is to provide our response to the above-titled report issued by your office on August 9, 2010. We concur with the bulk of the recommendations that you have made in the report. A corrective action plan is included as an attachment to this document.

We also appreciate the adjustments your office has made in the final report based on our comments on the draft edition of the report. We do, however, continue to disagree with two of the proposed recommended actions contained in the report. These are the two recommended actions reflected with a status code of "U" on pages 22 and 23 of the report. (Information found at the bottom of page 23 indicates this to mean that the "recommendation is undecided with resolution efforts in progress.") They are as follows.

**Recommendation (2-3)**

*"Change EPA Order 1110.8A5, EPA Reorganization Policy, and the related toolkit to require that infrastructure requirements (including information systems) are considered and addressed, and risks are assessed in accordance with OMB Circular A-123 before implementing reorganizations."*



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As we indicated in our response to the draft version of this report, we believe that the current reorganization process provides sufficient opportunity for reviewers to raise concerns regarding infrastructure and risk. Further we believe that the length of time to implement infrastructure changes may require them to be phased in, or planned in advance of reorganization. However, we commit to conducting a review of the reorganization Order with a view toward making changes as needed. Pending completion of this review, we are reluctant to commit to any further actions beyond that at this time. Our corrective action plan includes the milestones/tasks associated with our commitment for our review of the Order.

Recommendation (3-4c)

*“Establish standard operating procedures to address (1) how recruitment actions are assigned to specialists, (2) the role of the Personnel Security Branch, and (3) how improvements suggested by feedback from the program office staff will be addressed.”*

We have taken the steps necessary to address the second part of this recommendation, specifically to work with the Personnel Security Branch (PSB) in the Office of Administration to *“establish guidelines in processing personnel actions as they relate to risk designation of positions and background investigation requirements for individuals.”* On June 17, 2010, we issued a Standard Operating Procedure (SOP) on position risk designation and background investigations which was signed by the acting PSB branch chief as well as by all three of the Human Resources Shared Service Center (HR-SSC) directors. A copy of that SOP can be found at the following address [http://intranet.epa.gov/ssc/forms/position\\_risk\\_background.pdf](http://intranet.epa.gov/ssc/forms/position_risk_background.pdf).

Our position on the first part of this recommendation related to the assignment of recruitment actions to human resources specialists, is that the supervisors in our HR-SSCs are in the best position to make work assignments and hold staff accountable for completing the assignments. In particular, the HR-SSC Directors need flexibility to adjust and redirect the workload for their respective organizations to best meet servicing priorities.

With respect to the third part of this recommendation (*“establish standard operating procedures on how improvements suggested by feedback from the program office staff will be addressed”*), we want to emphasize our agreement on the value of SOPs as a tool in promoting consistency in the operation of the HR-SSCs. That said, OARM is preparing to receive the advice and guidance from a taskgroup of the Executive Management Committee (EMC) on the Shared Service Centers. We plan to establish a customer advisory group to provide feedback and incorporate customer suggestions to address concerns, and ensure the three SSCs are operating with similar procedures. The EMC taskgroup is scheduled to issue their recommendations in February 2011.

We have included a corrective action plan with the major milestones needed to address the remaining recommended actions. That plan is included as an attachment to this report. We thank you and your staff for their efforts to help us improve the operations of our Shared Service Centers.

If you or your staff have additional questions, please contact Kimberly Lewis, the Director, Office of Human Resources at (202) 564-4606 or Marvin Schulman of her staff at (202) 564-7778.

Attachment

cc: Nanci Gelb  
Maryann Froehlich  
Margaret Schneider  
John Showman  
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Leo Gueriguian  
Patrick Huber  
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**ACTION PLAN**  
**OIG Report 10-P-0177**  
***"EPA's Hiring Process Needs Additional Improvements"***

**Recommendations 2-1 and 2-2**

**Recommendations:** 2-1 – *Determine the scope of services to be provided under a human resources line-of-business provider contract. Among the services considered should be an automated workflow process, a tracking system with responsive in-process metrics that will be provided to EPA, and a system to develop and catalog position descriptions.*

2-2 – *Based on the above considerations, select a line-of-business provider and develop and implement a plan to migrate to the selected provider.*

**Response to Recommendations:** Concur

**Milestones:**

- o Scope of services has been developed and business case is in the final stages of development for presentation to the Office of Personnel Management.
- o Make decision on proposed HR-LoB provider (selection of HR-LoB provider contingent upon agreement of OCFO and OEI) - 6/2011.
- o Tentatively plan to deploy system and train user community, contingent upon a decision and a mutually approved project schedule with the selected HR LoB provider - 9/30/2013.

**Planned Completion Date:** 9/30/2013

**Recommendation 2-3**

**Recommendation:** *Change EPA Order 1110.8A5, EPA Reorganization Policy, and the related toolkit to require that infrastructure requirements (including information systems) are considered and addressed, and risks are assessed in accordance with OMB Circular A-123 before implementing reorganizations.*

**Response to Recommendation:** Non-concur with follow-up review

**Milestones:**

- o Review OMB Circular A-123, Directives Clearance Review (DCR) comments on EPA Order 1110.8A5, and findings raised in OIG report 10-P-0177- 2/1/2011.
- o Determine the changes needed to address or resolve any areas of weakness or deficiency by 3/1/2011.

**Planned Completion Date:** 3/1/2011

#### **Recommendation 2-4**

**Recommendation:** *As specified in the 2008 Customer Service Standards, begin and implement methods to: (a) identify customer inquiries and how long it took to respond to those inquiries, and (b) measure performance toward establishing timeliness goals for Service Centers' responses*

**Response to Recommendation:** As noted on page 11 of the report, this recommendation has been addressed with the addition of a question related to timeliness of responses to customer inquiries to the HR-SSC customer survey.

#### **Recommendation 3-1**

**Recommendation:** *Help the Assistant Administrators and Regional Administrators develop and use standard position descriptions where practicable. These position descriptions should be included in the electronic position description library and made available to all offices.*

**Response to Recommendation:** Concur

#### **Milestones:**

- o The Assistant Regional Administrators and the human resources community were briefed on this project in spring 2010 and an implementation workgroup organized in June 2010. Standard position descriptions (PDs) and related documentation for "top 10" high frequency positions/roles have been developed.
- o Post initial set of standardized PDs and related documents for "top 10" high frequency positions on EPA intranet -12/31/2010.
- o Continue to develop standard PDs and associated documents until the majority of those that can be standardized have been completed – 9/30/2013.

**Planned Completion Date:** 9/30/2013

#### **Recommendation 3-2**

**Recommendation:** *Work with the Assistant Administrators and Regional Administrators to review questions in the EZ-Hire question library and, if needed, correct erroneous or out-of-date questions.*

**Response to Recommendation:** Concur

#### **Milestones:**

**Note:** OHR had previously gone through the question library, eliminating a large number of questions. The Federal hiring reform initiative has created the need for additional changes (such as the elimination of essay-answer questions). This has a substantial impact on the questions remaining in the question library and increases the need for the involvement of Subject Matter Experts (SMEs) from the hiring offices as the need for new questions arise. Some of that involvement will occur as recruitment actions are worked.

- o Work with SMEs to begin to develop standard questions to be used in conjunction with standard PDs - 11/2010 (and on-going.)
- o Determine the kinds of questions that will be most useful as replacements for the "long-answer" questions by 2/1/2011.
- o Develop guidance on EZHire question strategy for use by SMEs and hiring officials by 9/30/2011.

Planned Completion Date: 9/30/2011

**Recommendation 3-3**

Recommendation: *Increase the involvement of the SMEs in reviewing applications to determine who should be on the candidate list sent to the selecting official.*

Response to Recommendation: Concur

Milestones:

Note: The process of identifying the impact of the Federal hiring reform initiative is on-going. As our efforts to implement the initiative continue, we will find additional opportunities to involve SMEs throughout the hiring process.

- o Development and deployment of training on category rating process has progressed through its initial stages. Guidance has been developed for selecting officials and SMEs to increase their understanding of their role in the job analysis process and the requirements of end-to-end timelines.
- o Develop guidance on "down-scoring" applicants whose applications don't support their EZHire answers by 1/31/2011.

Planned Completion Date: 1/31/2011

**Recommendation 3-4**

Recommendation: *Address staffing, policy, and procedural needs for processing appointment actions until EPA migrates to a line-of-business provider. Specifically: (a) ensure there are sufficient, qualified personnel to operate the service centers, (b) expeditiously issue the category rating policy, (c) establish standard operating procedures to address*

1. *how recruitment actions are assigned to specialists*
2. *the role of the Personnel Security Branch, and*
3. *how improvements suggested by feedback from the program office staff will be addressed*

*(d) ensure the service centers follow the standard operating procedures, and (e) ensure sufficient internal controls on data quality to ensure the Human Resources Activity and Communication Tracking System information is complete and accurate.*

Response to Recommendation: No response is needed on 3-4(a), 3-4 (b), 3-4 (d) and 3-4 (e) as the report reflects these recommendations as closed. Response to 3-4(c) is non-concur for reasons stated in the covering memorandum to this action plan.