



October 30, 1998

ASVET MEMORANDUM NO. 2-99

MEMORANDUM FOR: REGIONAL ADMINISTRATORS AND DIRECTORS FOR  
VETERANS EMPLOYMENT AND TRAINING

FROM:   
ESPIRIDION (AL) BORREGO

SUBJECT: Management Control/Risk Assessment Reviews

**PURPOSE:** This memorandum provides information on the agency's plan to perform a review of agency management controls, and assess inherent risks if such controls are either not being fully implemented, are lacking, or need refinement. An important part of this effort will be providing technical assistance to address such management control issues, and to identify "best practices" used by various organizational components that can be shared with the entire agency.

**REFERENCES:** Federal Financial Managers' Financial Integrity Act (P.L. 97-255); Government Performance and Results Act (P.L. 103-62); OMB Circular No. 123 Revised (Management Accountability and Control); Inspector General Act (P.L. 95-452, as amended); Chief Financial Officers Act (P.L. 101-576)

**BACKGROUND:** The Federal Financial Manager's Financial Integrity Act (FFMFIA) specifically requires that agency heads establish management controls and annually report on the control and financial systems that protect the integrity of Federal programs. The Chief Financial Officer's Act requires agency heads to assure the Chief Financial Officer that management controls exist and are adequate to provide reasonable assurance that data used to compile performance information included in the Department's Consolidated Financial Statements is accurate and complete.

These laws also provide for external oversight functions to ensure that the management control mandate is implemented. For instance the Chief Financial Officer's Act requires CFO auditors to report on internal controls and audit financial statements, and the Inspector General Act provides for independent reviews of agency programs and operations. The Government Accounting Office performs audits and reviews at the agency level to ensure that the provisions of these laws, including the Government Performance and Results Act (Results Act), are complied with.

INFORMATION: OMB Circular 123 sets forth the mandate that proper stewardship of Federal resources is a fundamental responsibility of agency managers and staff. It is necessary that Federal employees ensure that government resources are used efficiently and effectively to achieve intended program results. Such resources must be used consistent with agency mission, in compliance with law and regulation, and with minimal potential for waste, fraud, and mismanagement.

The way to achieve this mandate is by establishing, assessing, correcting and reporting on management controls. OMB Circular No. 123 describes management controls as the organization, policies, and procedures (in essence, the tools) used by agencies to reasonably assure that (1) programs achieve their intended results; (2) resources are used consistent with agency mission; (3) programs and resources are protected from waste, fraud, and mismanagement; (4) laws and regulations are followed; and (5) reliable and timely information is obtained, maintained, reported and used for decision-making. Management accountability is described as the expectation that managers are responsible for the quality and timeliness of program performance, increasing productivity, controlling costs and mitigating adverse aspects of agency operations, and assuring that programs are managed with integrity and in compliance with applicable law.

VETS has developed a Strategic Plan and Annual Performance Plans consistent with the mandates of the Results Act. Specific performance goals have been established, and results-oriented, accountable management will be crucial to our success in meeting them. VETS is now at an important stage in reorienting agency management processes to support attainment of these goals. We are moving to integrate plans and goals into the budget process and the operational management of programs. Instituting the Veterans' Operations and Program Activities Report (VOPAR) has been key in this effort. A critical outgrowth of this process ultimately will be accountability reporting to the public on performance results, and on the integrity, efficiency, and effectiveness with which they are achieved.

In order to assist us in meeting our mandates under the FFMIA, the Chief Financial Officer's Act and the Results Act and to determine if the ASVET's policies are being implemented, the agency is undertaking a review of VETS' system of management controls, and assessing inherent risks if such controls are either not being fully implemented, are lacking, or need refinement. For the field this review will look at Regional operations. A pilot review was conducted in Atlanta in August, 1998, and a second pilot is planned in the very near future for Philadelphia. The pilots serve to test the effectiveness of the review instrument, and to make necessary refinements.

The review team will be composed of Office of Agency Management and Budget (OAMB) and Office of Operations and Programs (OOPS) representatives, plus representatives from the field selected by the OOPS Director. The review will focus on the following inter-related items:

1. Identifying the management controls utilized by the agency and Regional Administrator, and their effectiveness. Part of this process will be determining the extent that management controls

utilized by the agency and Regional Administrator include checks on the use of DOL and VETS operational guidance (such as use of the DVOP/LVER and Local Employment Service Office manuals or other similar guidance during local office reviews).

2. Determining the extent to which the agency's and Regional Administrator's planning mechanisms and Annual Work Plan process further Results Act principles and the goals of VETS' Strategic and Annual Performance Plans.
3. Determining how the Regional Administrator ensures that information entered in the Veterans' Operations and Program Activity Report (VOPAR) is accurate and timely.
  - Is information entered into (and obtained from) the USERRA Information Management System and the DVOP/LVER Information Management System accurate, complete and timely?
  - How reliable is data obtained from outside sources; are VETS staff doing everything they can to help ensure data accuracy?
4. Determining the extent to which agency and Regional administrative support meets DOL and VETS standards.
5. Determining areas where National Office programmatic and administrative guidance is weak, out of date, or non-existent, and the impact this has on Regional operations.

If issues are identified during the Regional part of the reviews, the team will make action-oriented recommendations to resolve the issues as part of the report that will be shared with the Regional Administrator. Where possible and consistent with the talents of individual team members, technical assistance to implement agreed upon actions will also be offered. Additionally, the review team will identify management control "best practices" that individual Regions have developed, and share such best practices with the entire agency.

These Management Control/Risk Assessment reviews have a high priority, and all VETS staff are expected to cooperate fully in their implementation.

**ACTION:**

1. The attached draft Management Control/Risk Assessment Review instrument lists "Records the Region Should Make Available for the Review" at the end of each of 10 Subject Area sections. Each Regional office will be expected to take necessary action to ensure that all such records are on hand and available for the review team's ready reference at the beginning of and throughout the review week. However, since the Philadelphia pilot review may further refine the lists of "Records the Region Should Make Available for the Review", no action need be taken by other Regions at the present time.

2. A revised instrument will be developed after the Philadelphia review. This version of the instrument along with a schedule for remaining Regional visits is expected to be provided by Director's Memorandum shortly after the Philadelphia review. At the current time, plans are to complete the Regional reviews by the end of FY 2000.

Regions are encouraged to use the Management Control/Risk Assessment instrument and conduct a self-evaluation prior to the review team's visit. If this is accomplished, the purpose of the review team visit would be to validate the Region's own self-evaluation.

3. Current plans are for the review team to travel to the Regional office on Monday; conduct all review activities by the close of business Thursday; and present a report of their findings to Regional management in a Friday morning "closeout" meeting in the Regional office.
4. Following the close-out meeting discussing the review's findings, the review team will (if necessary) redraft the report of findings to reflect any changes agreed upon and/or brought to light at the close-out meeting, and submit this redraft to the Regional Administrator within one week of the completion of the review.
5. The Regional Administrator will prepare a response to the review team's close-out report within one week of receiving it. In this response, the Regional Administrator shall discuss any portions of the review findings on which he may wish to comment, particularly those recommendations that he may not concur with, and recommendations for National Office action. The Regional Administrator shall also address in this response the nature and schedule of actions planned and taken on review team recommendations that he has concurred with.
6. The Directors of OAMB and OOPS will conduct a preliminary meeting with the Regional Administrator and the review team leader on the close-out report and the Regional Administrator's response; the two Directors will address any close-out report recommendations that the Regional Administrator has not concurred with. The Director of OOPS will then schedule a meeting with the ASVET/DASVET for himself and the Regional Administrator to present the results of the review.

**INQUIRIES:** Questions should be directed to Eric Rudert on (202) 219-8421 or Heather Sexton (202) 219-9105.

**EXPIRATION DATE:** September 30, 2000

**Attachment**

**MANAGEMENT CONTROL/RISK ASSESSMENT REGIONAL REVIEW INSTRUMENT**

*Subject Areas:*

- A. Regional Management**
- B. Data Collection, Analysis and Reports**
- C. Grants Management**
- D. Enforcement**
- E. Budget Formulation and Financial Management**
- F. Personnel Management**
- G. Administrative Services**
- H. Procurement**
- I. Timekeeping**
- J. Travel**

A. Regional Management  
Risk Assessment Instrument  
(VETS Management Control Program)

U.S. Department of Labor  
Office of the Assistant Secretary for  
Veterans' Employment and Training

Region \_\_\_\_\_ Prepared by: \_\_\_\_\_ Date \_\_\_\_\_  
 Risk Rating \_\_\_\_\_ (Name and Title)  
 Review Dates \_\_\_\_\_ High \_\_\_\_\_ Medium \_\_\_\_\_ Low \_\_\_\_\_  
 Review by: \_\_\_\_\_ Date \_\_\_\_\_  
 Approved by: \_\_\_\_\_ Date \_\_\_\_\_  
 (Name and Title)

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Control Techniques	Control			Risk Rating	Provide rationale for "High" ratings	List identified issues, recommendations & planned actions, other comments
	Ad	Inad	H M I			
<b>1. Management Attitude</b> a. Does the RA use an effective system of management controls, and do managers and staff understand controls and their importance? Do the management controls reflect the strategic goals of the agency? b. Does Regional management communicate effectively with staff (are issues and concerns adequately addressed?)						
<b>2. Personnel</b> a. Are management personnel adequately trained in the management/supervisory aspects of their jobs? b. Are managers and supervisors rated on their management control responsibilities in performance appraisals? c. Does management communicate effectively with the union?						
<b>3. Organization</b> a. Do managers perceive they have the necessary decision-making authority to manage/operate effectively? b. Are delegations of authority in writing and available?						

Component

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Control Techniques	Control			Risk Rating	Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H. M. L.			
<b>4. Policies and Procedures</b> a. Has Regional management issued written guidance which support significant activities and policies? (Such as support for the strategic plan & VOPAR)  b. Are new policies and procedures disseminated within a reasonable period of time after issue?						
<b>5. Reporting</b> a. Does Reg'l management receive relevant, accurate, timely monthly reports for inclusion in the VOPAR and AWP and other Regional reports, and for use in monitoring and evaluating performance of significant activities?  b. Are adequate steps taken if information isn't timely or accurate/relevant?  c. Does the RA compare program performance to previous years, and develop plans to improve program performance indicators if necessary?						

A. Regional Management  
 Risk Assessment Instrument  
 (VETS Internal Control Program)  
 Region

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Component

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Control Techniques	Contrl Ad.	Risk Rating			Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
		Inad.	H	M		
RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW  1) RA's management control plan for the Region (if it exists) 2) Elements and standards for all staff 3) Delegations of Authority 4) Written Regional guidance on policies, procedures and significant activities (Can be samples of EMails)						



**MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**A. Regional Management**

Issue:

Recommendation:

Action Planned:

Action

**REGIONAL BEST PRACTICES**

B. Data Collection, Analysis and Reports  
 Risk Assessment Instrument  
 (VETS Internal Control Program)

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Region \_\_\_\_\_ Risk Rating \_\_\_\_\_ Prepared by: \_\_\_\_\_ Date \_\_\_\_\_  
 \_\_\_\_\_ High \_\_\_\_\_  
 \_\_\_\_\_ Medium \_\_\_\_\_  
 \_\_\_\_\_ Low \_\_\_\_\_  
 Review by: \_\_\_\_\_ Date \_\_\_\_\_  
 (Name and Title)  
 Approved by: \_\_\_\_\_ Date \_\_\_\_\_  
 (Name and Title)

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Control Techniques	Control Risk Rating			List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H M L	
<b>1. Organization and Administrative Safeguards</b>  a. Are procedures readily available to all staff on compiling and analyzing data, and utilizing results, and are the staff trained to effectively implement them?  b. Does Regional staff follow established procedures when data collection, analysis and report generation are performed?  c. Are procedures developed to minimize errors in data collection, analysis and reporting and then incorporated into the activity?				
<b>2. Access Safeguards for Data Collection</b>  a. Do procedural security safeguards exist to control unauthorized access to collected data or their use?  b. Does the staff follow these procedures?  c. Does management adequately oversee adherence to these access procedures?				

B. Data Collection, Analysis and Reports  
 Risk Assessment Instrument  
 (VETS Internal Control Program)  
 Region

Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Component

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Control Risk Rating  
 Ad. Inad H M L Provide rationale for "High" ratings. List identified issues, recommendations & planned actions; other comments

RECORDS THE REGION SHOULD  
 MAKE AVAILABLE FOR THE REVIEW

- 1) Regional specific policies and procedures on data collection, analysis and reporting
- 2) Source documents for entries into the VOPAR
- 3) Access to Regional databases, analyses of data, and reports generated by staff in the Region

**MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**B. Data Collection, Analysis and Reports**

Issue:

Recommendation:

Action Planned:

Action

**REGIONAL BEST PRACTICES**

C. Grants Management  
 Risk Assessment Instrument  
 (VETS Internal Control Program)

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Region: \_\_\_\_\_

Review Dates: \_\_\_\_\_

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Risk Rating: \_\_\_\_\_  
 High  
 Medium  
 Low

Prepared by: \_\_\_\_\_  
 (Name and Title)

Review by: \_\_\_\_\_  
 (Name and Title)

Approved by: \_\_\_\_\_  
 (Name and Title)

Date: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

Control Techniques	Control Inadequacy	Risk Rating	Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
Ad.	Inad.	H   M   L		
<b>1. Application Safeguards</b>  a. Are program, financial and administrative reviews completed by the DVET/Region prior to DVOP/LVER grant award?				
<b>2. Grantee Performance</b> a. Does the Regional Administrator have a management control system in place for grants?  b. Does a review of records in the control system show that Regional and State staff effectively utilize Operations Manuals and other agency guidance in administering grants for:  DVOP/LVER? HVRP? JTPA IVC?				

C. Grants Management  
 Risk Assessment Instrument  
 (VETS Internal Control Program)  
 Region \_\_\_\_\_

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Component \_\_\_\_\_

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Control Techniques	Control Ad. Inad.	Risk Rating H   M   L	Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
c. Are Grantee program and administrative performances monitored by on-site visits using approved monitoring guidelines, for --DVOP/LVER? --JTPA IVC? --HVRP?				
d. Are sample levels for participants, performed at the levels recommended in Operations Manuals, and are sample levels verified/validated by the RO for				
--DVOP/LVER (including job orders)? --JTPA IVC? --HVRP?				
e. Are important administrative provisions and issues associated with DVOP/LVER grants being actively addressed, and monitored for impacts of				
--Privatization? --One-Stop? --Unemployment Insurance? --AIB/ATB? --Staffing levels?				

Component

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Control Techniques	Control			Risk Rating	Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H M L			
f. Are unexpended funds and government property returned to the agency within allowable time frames after the grant expiration date, along with a closeout report, for --DVOP/LVER? --JTPA IVC? --HVRP?						
<b>3. Reviews and Response</b>						
a. Are management reviews done in a timely fashion for each of the three grant programs?						
b. Were any weaknesses identified by the RA and corrective actions taken?						
<b>RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW</b>						
1) Descriptions of RA's management controls for Grants (if they exist) 2) RA's written assessments of grants operations in the Region (if in existence) 3) JTPA IVC and HVRP monitoring reports, and LESO evaluations for the current & previous fiscal year, and RA reviews of such 4) Grant source data that is used in VOPAR 4) Regional grant files for DVOP/LVER JTPA IVC, and HVRP						

**MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**C. GRANTS MANAGEMENT**

Issue:

Recommendation:

Action Planned:

Action

**REGIONAL BEST PRACTICES**

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D. Enforc  
 Risk Assessment Instrument  
 (VETS Internal Control Program)

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Region \_\_\_\_\_ Risk Rating \_\_\_\_\_ Prepared by: \_\_\_\_\_ Date \_\_\_\_\_  
 Review Dates \_\_\_\_\_ Approved by: \_\_\_\_\_ Date \_\_\_\_\_  
 (Name and Title) (Name and Title) (Name and Title)

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Control Techniques	Control	Risk Rating			List identified issues, recommendations & planned actions; other comments
		Ad.	Inad.	H M L	
<b>1. Initiation of Enforcement Actions</b> a. Does the RA have a management control system in place to ensure that staff follow Operations Manual guidance and other National Office guidance on: ---USERRA? ---Referrals on complaints against Federal Contractors? ---Veterans Preference?					
b. Is National Office guidance and RA guidance communicated effectively and in a timely manner?					
<b>2. Conduct of the Enforcement Action</b> a. Are Regional staff adequately trained in proper procedures and the law for ---USERRA ---FCP ---Veterans' Preference					

D. Enforcement  
 Risk Assessment Instrument  
 (VETS Internal Control Program)  
 Region

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Component

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Control Techniques	Control			Risk Rating			List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H	M	L		
b. Do field staff file complete, accurate and timely information in the UIMS, and on FCP and veterans' preference complaint referrals?							
<b>3. Quality Control</b>							
a. Do the programs have adequate supervisory review and quality assurance procedures, for ---USERRA? ---FC referrals? ---Veterans' Preference?							
b. Are the reporting systems monitored to ensure compliance?							
<b>RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW</b>							
1. Quality Assurance Reviews conducted by Region in current and previous fiscal year							
2. Quality Assurance Review conducted by the RLC for the Region							
3. Examples of guidance provided by the RA on USERRA, FCP and Veterans' Preference							
4. Elements and standards for Regional staff with USERRA duties							

**MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**D. Enforcement**

Issue:

Recommendation:

Action Planned:

Action

**REGIONAL BEST PRACTICES**

E. Budget Formulation and Financial Management  
 Risk Assessment Instrument  
 (VETS Internal Control Program)

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Region \_\_\_\_\_ Risk Rating (Name and Title) \_\_\_\_\_ Prepared by: \_\_\_\_\_ Date \_\_\_\_\_  
 \_\_\_\_\_ High \_\_\_\_\_ Medium \_\_\_\_\_ Low

Review Dates \_\_\_\_\_ Review by: (Name and Title) \_\_\_\_\_ Date \_\_\_\_\_  
 \_\_\_\_\_ Approved by: (Name and Title) \_\_\_\_\_ Date \_\_\_\_\_

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Control Techniques	Control			Risk Rating			List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H	M	L		
<b>1. Policies and Procedures</b>  a. Are there effective management controls in place that encompass budget formulation and financial management?  b. Is there ready access to DOL and the Agency's budget and financial management policies?  c. Are new policies and procedures regarding budget submissions & financial management disseminated to all appropriate individuals within a reasonable period of time after issue?							
<b>2. Planning Guidance and Instructions</b>  a. Is adequate guidance given for planning and budgeting and how to tie to Agency performance goals?  b. Does the RA receive relevant, accurate, timely reports on all program and administrative areas in order to develop a realistic budget, and manage it?  c. Does the Region follow instructional package in the stage of developing the budget request?							

Component

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Control Techniques	Control			Risk Rating	List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H M L		
<p><b>3. Recording and Controls</b></p> <p>a. Are there adequate and proper safeguards established to preclude violation of the Anti-Deficiency Act?</p> <p>b. Is the DFR effectively used to reconcile financial balances?</p> <p>c. Is there documentary evidence required in recording obligations?</p> <p>d. Are all obligations promptly recorded?</p> <p>e. Are safeguards available to ensure that all apportioned and allotted funds are being made available for obligation?</p>					
<p><b>4. Review and Monitoring</b></p> <p>a. Does the RA maintain an easily accessible and understandable system of financial accounts that enable effective monitoring of the current status and disposition of allotments, allocations obligations and expenditures?</p> <p>b. Does the take corrective actions in response to all audit or review findings?</p> <p>c. Are reviews of undelivered orders conducted at least monthly to ensure that all outstanding obligations are valid?</p>					

Component

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Control Techniques	Control Risk Rating					List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H	M	L	
<b>RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW</b>  1) Regional specific policies and procedures on budgeting and financial management 2) Financial accounts system for current and previous FY 3) All obligating documents for current FY 4) Any Regional audit reviews from FY 95						

**REGION IV MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**E. Budget Formulation and Financial Management**

Issues:

Recommendation:

Action Planned:

Action:

**REGIONAL BEST PRACTICE**

F. Personnel Management  
 Risk Assessment Instrument  
 (VETS Internal Control Program)

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Region \_\_\_\_\_ Prepared by: \_\_\_\_\_ Date \_\_\_\_\_  
 Review Dates \_\_\_\_\_ Review by: \_\_\_\_\_ Date \_\_\_\_\_  
 Risk Rating \_\_\_\_\_ Approved by: \_\_\_\_\_ Date \_\_\_\_\_  
 \_\_\_\_\_ (Name and Title)

Pg. 1 of 4

Control Techniques	Control			Risk Rating	Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H M L			
<b>1. Reporting</b> a. Does Reg'l management maintain effective management controls on personnel matters, and receive from DVEITS accurate, timely reports for inclusion in the VOPAR and for use in monitoring and evaluating performance? b. What steps are taken if information isn't timely or accurate/relevant, or if there are personnel problems, or problems with performance?						
<b>2. Position Management and Classification Safeguards</b> a. Are position descriptions current and accurate? b. Is there a Regional position management plan and is it followed?						
<b>3. Merit Staffing Safeguards</b> a. Are established merit staffing procedures followed in filling positions? b. Have managers, supervisors and panel members been trained in merit staffing procedures?						
<b>4. Performance Appraisal and Merit Pay Safeguard</b> a. Do employees have perf. standards, and do they reflect agency perf goals (as appropriate)? b. Do managers and supervisors receive training in performance appraisal? c. Do procedures exist to ensure that performance appraisals are completed when scheduled?						



F. Personnel Management  
 Risk Assessment Instrument  
 (VETS Internal Control Program)  
 Region

Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Component

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Control Techniques	Control Risk Rating			List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H. M. L.	
d. Is there written policy for the distribution of Performance award funds and is it followed?				
<b>5. Labor and Employee Relations Safeguards</b>				
a. Are efforts made to resolve employee complaints and grievances in the informal stage?				
b. Do managers and supervisors have copies of NCFLL union contracts?				
c. Have managers and supervisors received labor and employee relations, EEO, and sexual harassment training?				
<b>6. Employee Development and Training</b>				
a. Are employees adequately trained to perform duties?				
b. Are employee training needs reviewed and acted upon regularly, and are there Individual Development Plans for employees where they are required? Are they followed?				
<b>7. Human Resource Management Safeguards</b>				
a. Do performance standards for all managers and supervisors include EEO/diversity and human resource management responsibilities?				

Component \_\_\_\_\_

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Control Techniques	Control			Risk Rating	List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H M L		
b. Are EEO/diversity goals monitored for achievement on a regular basis? c. Do employees have access to EEO counselors? d. Are efforts made to resolve employee EEO complaints at the informal stage?					
<b>8. Records Security and Retention</b>  a. Are personnel records securely maintained and disposed of after a suitable period of time?  <b>RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW</b>  1) Current position descriptions on all Regional staff 2) Current performance standards for all Regional staff 3) All SF 52s (Notice of Personnel Action) for the current and previous FYs 4) Regional staffing plan					

**MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**F. Personnel Management**

Issue:

Recommendation:

Action Planned:

Action

**REGIONAL BEST PRACTICES**

G. Administrative Services  
 Risk Assessment Instrument  
 (VETS Internal Control Program)

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Region \_\_\_\_\_ Risk Rating \_\_\_\_\_ Prepared by: \_\_\_\_\_ Date \_\_\_\_\_  
 High  
 Review Dates \_\_\_\_\_ Medium \_\_\_\_\_ Review by: \_\_\_\_\_ Date \_\_\_\_\_  
 Low \_\_\_\_\_ Approved by: \_\_\_\_\_ Date \_\_\_\_\_  
 (Name and Title)

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Control Techniques	Control Risk Rating				List identified issues, recommendations & planned actions; other comments
	Ad	Inad	H	M	
<b>1. Maintenance of Records</b> a. Does the RA have a management control system for administrative services? If so, Is it being followed? b. Are detailed records and inventories maintained for individual items of property and equipment showing: * serial number and other descriptive data? * original acquisition cost? * current location and custodian? c. Are detailed status reports prepared from property records which identify items as: * surplus to needs of the agency? * in custody of contractors, grantees, or other agencies? d. Are these periodic reports reviewed to: * verify reported status? * determine if needed items can be obtained from other dept. units? e. Are detailed records confirmed at least annually by comprehensive physical inventory as of an established cut-off date? f. Are property records adjusted after detected differences are resolved?					

Region

Component

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Control Techniques	Control			Risk Rating	Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H M L			
<b>2. Accountability for Acquisition and Transfer</b> a. Are property passes required and used when an item leaves the facility? b. Are invoices checked regularly with inventory records to insure all acquisitions are accounted for? c. Are both losing and gaining offices' inventory records reconciled to ensure transferred property is accounted for? d. If an item is disposed of, is the disposition properly recorded in the accounting record?						
<b>3. Records Retention</b> a. How are agency records kept? b. Are records sent to the National Archives or destroyed? If so, how often? How long are records kept? c. Is there a record retention schedule available? d. Are NARS procedures followed when retiring records? e. Are records such as correspondence for RAVET's signature and records that contain SSNs (such as USERRA) cases secured?						

G. Administrative Services  
 Risk Assessment Instrument  
 (VETS Internal Control Program)

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Region \_\_\_\_\_

Component \_\_\_\_\_

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Control Techniques	Control				Risk Rating	Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
	Ad.	Inad.	H	M			
<b>4. Safety and Health Management</b> a. Are managers and employees aware of safety and health regulations and Secretary's Order 12-95? b. Are safety and health regulations followed? (are safety and health inspections done annually, both in the Regional Office & State Offices that house VETS employees?) c. Do managers and employees understand what constitutes unsafe working conditions (such as hazards, and the difference between inadequate and adequate egress?) Do they know where such information can be obtained?  <b>RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW</b> 2) Any RA written assessments of administrative operations in the Region (if in existence) in the past year 3) All Regional specific policies and procedures on admin services and operations 4) All inventory records 5) All property records for property acquired in the current and previous FY with an acquisition value of over \$25,000 6) Procurement records for the current and previous FY 7) All DL1-55s (DPAP Transaction Form/ Survey Report) for the current FY							

**MANGEMENT CONTROL REVIEW DETAILED COMMENTS**

**G. ADMINISTRATIVE SERVICES**

Issue:

Recommendation:

Action Planned:

Action

**REGIONAL BEST PRACTICES**

H. Procurement

Risk Assessment Instrument  
(VEFS Internal Control Program)

Region \_\_\_\_\_

Review Dates \_\_\_\_\_

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Department of Labor

Office of the Assistant Secretary for  
Veterans' Employment and Training

Risk Rating Prepared by: \_\_\_\_\_ Date \_\_\_\_\_  
 (Name and Title)

Review by: \_\_\_\_\_ Date \_\_\_\_\_  
 (Name and Title)

Approved by: \_\_\_\_\_ Date \_\_\_\_\_  
 (Name and Title)

Control Techniques	Control Ad.	Inad.	Risk Rating		Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments
			H	M		
<b>1. Pre-Award Procedures</b> a. Are there frequent deviations from budgeted goods and services during the year? Do such deviations appear justified? b. Does the Region obtain goods and services from DOL and GSA approved contractors? Are DOL procedures adhered to in sole source procurement? c. Does the Region use SBA 8(a) contractors when possible? d. Are there internal control procedures for small purchases?						
<b>2. Monitoring Contracts</b> a. Do written procedures exist for monitoring contracts? b. Are records, including invoices, reviewed periodically? c. Are current costs reconciled periodically? d. Are final payments held pending completion of work?						



H. Procureur

Risk Assessment Instrument  
(VEIS Internal Control Program)

Region

U.S. Department of Labor  
Office of the Assistant Secretary for  
Veterans' Employment and Training

Component

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Control Techniques  
comments

**3. Review and Closeout**

- a. Are goods/services verified as meeting specifications?
- b. Are closeouts begun shortly after contract completion or termination?
- c. Do audit resolutions and closeouts meet required deadlines?

**RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW**

- 1) List of goods and services that formed the basis for the approved Regional budget in this area.
- 2) All DL1-1s (Requisition for Equipment, Supplies or Services) for the current and previous FY
- 3) Any contract audit closeouts for the current and previous FYs

Control Risk Rating

Ad. Inad. H M L

Provide rationale for "High" ratings.

List identified issues, recommendations & planned actions; other

**MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**H. Procurement**

Issue:

Recommendation:

Action Planned:

Action Taken:

**REGIONAL BEST PRACTICES**

**I. Timekeeper  
Risk Assessment Instrument  
(VEIS Internal Control Program)**

Region \_\_\_\_\_  
Review Dates \_\_\_\_\_

Risk Rating  
 High  
 Medium  
 Low

PREPARED BY: \_\_\_\_\_  
REVIEWED BY: \_\_\_\_\_

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Control Techniques

**I. Administrative Controls**

- a. Does the RA's management system address timekeeping issues?
- b. Are flextime/Standard Time sheets maintained in a centrally accessible location? Are work hours periodically verified?
- c. Are time and attendance cards:
  - \* maintained only in the custody of an approved timekeeper or a designated alternate timekeeper in a secure location?
  - \* reviewed and approved by the supervisor?
  - \* delivered for transmittal to payroll by someone other than the timekeeper?
- e. Do timekeepers adhere to applicable internal control procedures?

**2. Overtime/Compensatory Time Controls**

- a. Is overtime/compensatory time approved in advance?
- b. Is a designated official, above the immediate supervisor, assigned the responsibility for reviewing and approving or disapproving overtime/compensatory time requests?

Control Ad.	Inad.	Risk Rating H M L	Provide rationale for "High" ratings.	List identified issues, recommendations & planned actions; other comments

I. Timekeeping  
 Risk Assessment Instrument  
 (VETS Internal Control Program)

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Region \_\_\_\_\_  
 Component \_\_\_\_\_

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Control Techniques	Control		Risk Rating		Provide rationale for "High" ratings	List identified issues, recommendations & planned actions, other comments
	Ad	Inad	H	M		
<p>c. Are measures taken to ensure adequate supervision for all overtime/compensatory time worked?</p>						
<p><b>3. Time and Attendance Controls</b></p> <p>a. Is leave (other than emergency annual leave, sick leave or credit hours used outside of core hours) approved in advance by the supervisor?</p> <p>b. Is each employee required to complete a SF-71 or other leave slip when requesting leave?</p> <p>c. Are employees required to initial leave taken on the time and attendance card prior to supervisory review and approval?</p> <p>d. Are leave records and reports accessible to the supervisor?</p> <p>e. Does alternate timekeeper do regular Timesheets periodically.</p> <p><b>RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW</b></p> <p>1) Regional specific policies and procedures relating to timekeeping and attendance, and overtime/compensatory time in the Region</p> <p>2) Timekeeping and attendance records for the current and previous Fys, including approved overtime and compensatory time records</p>						



**MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**I. Timekeeping**

Issue:

Recommendation:

Action Planned:

Action Taken:

**REGIONAL BEST PRACTICES**



Component \_\_\_\_\_

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Control Techniques	Control And Inad.	Risk Rating H M L	Provide rationale for "High" ratings. List identified issues, recommendations, & planned actions; other comments
d. Are lodging receipts, copy of ticket and copy of itinerary required to be submitted with vouchers?			
e. Are cost comparisons included on vouchers in all required situations?			
f. Are travelers required to attach a personal check to vouchers when the amount claimed does not completely liquidate the outstanding balance?			
g. Are unused tickets promptly returned for refund?			
h. Are records of employee travel and payments maintained?			
i. Are outstanding advance balances reconciled regularly?			
j. Are OASAM requirements followed for identifying and recovering outstanding advance debts?			
<b>3. Permanent Change of Station (PCS)</b>			
a. Are all Travel Authorization and vouchers reviewed and signed by an authorized manager and forwarded to Kansas City MO?			

J. Travel  
 Risk Assessment Instrument  
 (VETS Internal Control Program)  
 Region

U.S. Department of Labor  
 Office of the Assistant Secretary for  
 Veterans' Employment and Training

Component

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Control Techniques	Control	Inad.	H	M	L	Risk Rating	List identified issues, recommendations & planned actions; other comments
b. Are transferees required to sign an Employment Agreement before the authorization is issued and any costs are incurred?							
c. Are GSA-required comparisons made between the "actual expense" and "commuted rate" methods for shipment of household goods?							
d. Are advances limited to allowances for which advances are permitted?							
e. Are advances limited to a reasonable estimate of allowable expenses?							
f. Are vouchers submitted according to time requirements after each phase of the relocation?							
g. Are vouchers reviewed and approved in accordance with the terms of the authorization?							
h. Are househunting trips authorized only when necessary?							
i. Is temporary quarters authorized only for the necessary and justifiable number of days rather than maximum?							
j. Are outstanding advance balances promptly collected when not fully liquidated by the final claim?							



J. Travel  
 Risk Assessment Instrument  
 (VETS Internal Control Program)  
 Region

Component

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Control	Risk Rating	Ad. Inad. H. M. L.	Provide rationale for "High" ratings. List identified issues, recommendations & planned actions; other comments
<p>RECORDS THE REGION SHOULD MAKE AVAILABLE FOR THE REVIEW</p> <ol style="list-style-type: none"> <li>1) Regional specific policies and procedures on travel</li> <li>2) For the current and previous FYS, copies of travel vouchers, and PCS vouchers (if they exist).</li> </ol>			

**MANAGEMENT CONTROL REVIEW DETAILED COMMENTS**

**J. Travel**

Issue:

Recommendation:

Action Planned:

Action Taken:

**REGIONAL BEST PRACTICES**