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**REPORT OF THE
COMPTROLLER GENERAL
OF THE UNITED STATES**

**Planning, Controlling, And
Propriety Of Training In
Region VIII**

AGC 01346

Department of Health, Education, and Welfare



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-70896

The Honorable Patricia Schroeder
House of Representatives

Dear Mrs. Schroeder:

This report responds to your request for information on the implementation of employee training provided under title 5, chapter 41, United States Code (formerly the Government Employees Training Act), by the Department of Health, Education, and Welfare (HEW), Region VIII, Denver, Colorado. You asked whether:

- A training plan for the region exists.
- The regional training office exercises control over training.
- The upward mobility program is violated when employees are allowed to take courses leading toward a degree.
- Employees are allowed to take non-job-related courses in violation of 5 U.S.C. 4101(4) defining training as "directly related to the performance" by the employee of official duties for the Government."

We reviewed Region VIII fiscal year 1975 training activities in the office of the regional director and five constituent agencies. We concentrated on authorized training provided by colleges and universities. To determine the propriety of authorized training, we considered applicable laws and regulations and discussed many individual authorizations with HEW Region VIII, HEW headquarters, and Civil Service Commission officials.

On October 16, 1975, we briefed a member of your Denver office staff on our findings. (See app. I.) Briefly, our review showed:

- Some required training plans were not prepared, and those prepared were not in full accordance with Civil Service Commission and HEW instructions.

--The regional training office exercised some control over training; however, required review and evaluation procedures were not always followed.

--The criteria HEW applied in authorizing upward mobility, and to a limited extent other training, were of questionable usefulness in assuring that the training was beneficial to the Government. The criteria generally emphasized only what training could not be approved or allowed such wide discretion, particularly in the area of cognitive skills training, that officials authorized training more on the basis that it was not specifically prohibited than on the basis that it would enable employees to better perform official duties. Accordingly, in many instances, the usefulness of training authorized under the criteria was not apparent to us, to HEW regional and headquarters officials, and to Civil Service Commission personnel knowledgeable in training matters. However, considering that officials acted in good faith in following the criteria when authorizing training, we do not believe that title 5, chapter 41, United States Code, was violated.

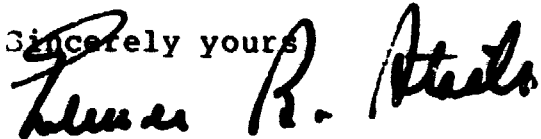
Some Region VIII problems were not unique. Similar problems were observed in our earlier review of HEW headquarters training and detailed in our report to the Congress (FPCD-75-84, Apr. 29, 1975) which showed that HEW and other Federal departments and agencies needed to improve upward mobility program administration. We also reported to the Congress (FPCD-75-120, Aug. 12, 1975) that HEW and other Federal executive departments needed to better evaluate Federal civilian employee training. HEW's progress in correcting these problems has been slow. Our current recommendations to the Secretary of HEW to eliminate weaknesses in training administration in Region VIII are on page 12 of appendix I.

As requested by your office, we did not send copies of this report to HEW officials for formal comment; however, we informally discussed it with HEW and Civil Service Commission officials and have considered their views where appropriate.

Because this report contains recommendations to the Secretary of HEW, under section 236 of the Legislative Reorganization Act of 1970, he is required to submit a written statement on actions he has taken on our recommendations to the House and Senate Committees on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with his agency's first request for appropriations made more than 60 days after the date of the report.

As agreed, we are sending a copy of this report to the four Committees cited above, HEW, the Civil Service Commission, and the Office of Management and Budget.

Sincerely yours

A handwritten signature in black ink, appearing to read "Luther R. Steele". The signature is written in a cursive style with a large initial "L" and "S".

Comptroller General
of the United States

PLANNING, CONTROLLING, AND PROPRIETY OF
TRAINING IN REGION VIII

The basic statute authorizing employee training throughout most of the Federal Government is title 5, chapter 41, United States Code (5 U.S.C. 4101 et seq. (1970)). Executive Order 11348 of April 20, 1967, gives agency heads additional direction on how to use the general statutory authority. Both the law and the Executive order authorize the Civil Service Commission (CSC) to issue regulations governing various aspects of the law.

According to the Government Employees Training Act, Public Law 85-507, July 7, 1958 (now 5 U.S.C. 4101 et seq. (1970)), each department and agency head has the primary responsibility for conducting training within that department or agency. Executive Order 11348 requires each agency head to plan, program, budget, operate, and evaluate training programs.

Within HEW, heads of constituent agencies, such as the Commissioner of the Social Security Administration, are responsible for carrying out training activities in conformance with applicable laws and regulations. Their responsibilities include

- determining training needs,
- developing plans and programs for meeting training needs,
- determining that authorized training meets legal and regulatory requirements, and
- evaluating training.

Heads of constituent agencies are assisted in fulfilling these responsibilities at field locations by regional managers. At the time of our review, there were five constituent agency regional managers in HEW Region VIII: in the Office of Education (OE), Food and Drug Administration (FDA), Public Health Service (PHS), Social and Rehabilitation Service (SRS), and Social Security Administration (SSA). 1/ There is also a regional director who is responsible for training activities of the regional office and regional components of offices headquartered in Washington, D.C., such as the office for civil rights. Regional

1/The Office of Human Development is also now an agency.

agency managers and the regional director have been delegated the authority, with certain limitations, to authorize training for employees within their respective jurisdictions.

The Deputy Assistant Secretary for Personnel and Training assists constituent agency heads by his leadership and guidance to insure that departmental training policies are carried out. The regional director, through the regional personnel officer and training officer, assists agency regional managers. Regional personnel offices also perform certain functions affecting all regional agencies and offices. They conduct training needs surveys, plan and conduct "common-need" training (such as for general clerical and secretarial skills), assure that authorized training meets legal and regulatory requirements, and evaluate certain aspects of agency training programs.

Region VIII training was both internal (provided by HEW), and external (provided by other Government agencies or colleges and universities). Most courses were taken at colleges and universities by employees enrolled in extended training programs--Upward Mobility College, STRIDE, and ACCESS.

UPWARD MOBILITY COLLEGE makes opportunities available to employees to participate in a course of study related to their present or potential duties at a college or university. In the course of such study, which is to increase the employee's ability to perform the duties of Government positions, the employee may earn an associate or a bachelor's degree.

STRIDE is a work-study program, generally of 3 years' duration, designed to prepare employees in lower level positions for professional level employment through training and carefully designed work assignments. Interns are placed in developmental assignments that lead to professional positions and spend a maximum of 20 hours a week of official duty time in completing an average of 15 credit hours a semester or quarter of college level training related to the duties of their positions.

ACCESS is a cooperative education program in which students work and attend a college or university alternately for 3- to 6-month periods. Students are employed on rotational

work assignments as student assistants to professionals to gain knowledge of a program and of the administrative activities of the Department. Their major course of study should be compatible with departmental programs. The intent of the program is that upon college graduation and meeting civil service requirements, the students will be placed in positions compatible with their training.

PLANNING FOR TRAINING

HEW requires that the office of the regional director and each constituent agency prepare annual training plans in accordance with Federal Personnel Manual (FPM) and HEW instructions. Directives specify that regional planning for training should be related to manpower plans which give information about the knowledge, abilities, and skills required for maximum effectiveness in agency positions. Agencies are instructed to use this information to determine individual training needs.

Six of the fifteen organizational units under the jurisdiction of the office of the regional director did not contribute to the fiscal year 1975 regional training plan, although some of their employees were involved in training activities. The office for civil rights overlooked the requirements; the office of long-term care was not established until May 1974, after fiscal year 1975 plans were prepared; other offices--human development, surplus property, personnel, and facilities and engineering--did not prepare plans because they understood their officials thought it unnecessary. One constituent agency, PHS, said it did not prepare a plan because none was required by its headquarters office. However, some PHS employees participated in fiscal year 1975 training.

Most regional offices and agencies which prepared plans had supervisors and employees identify training needs and desires. Supervisors were not, however, told how to relate training needs to manpower needs. Regional officials and agency managers said they did not have regional manpower planning systems and, therefore, could not relate training needs to manpower and staffing capabilities required to achieve program objectives.

There was one exception to this general pattern. Manpower placement goals were established for 21 positions earmarked for employees in upward mobility training. However, training needs were not established for these positions, nor were such needs specifically listed in training plans.

The regional director and his staff said that manpower planning is difficult in HEW because of many organizational and program changes. The regional personnel officer said that the manpower assessment related to determining training needs was not made for fiscal year 1975 because his office did not have the expertise. Manpower assessments were not made in fiscal year 1976 although training plans were prepared by each office and agency except PHS and SRS.

HEW's need to improve planning for training is not unique to Region VIII. We reported to the Secretary of HEW by letter dated July 19, 1973, on the need to strengthen the role of the office of personnel and training because HEW and its constituent agencies did not have

- training plans based on a formal review of needs,
- a systematic method for insuring that many categories of training were related to needs,
- specific criteria to enable them to make objective needs determinations,
- fully developed curriculum and courses for training,
or
- evaluations of training.

In response to our report, HEW developed an action plan to improve training needs identification, program analysis, and evaluation processes. HEW headquarters said it has implemented the new training plan process and will be able to compare actual training results to training planning data by spring 1976. HEW headquarters also has in use a review guide for evaluating training administration and management.

REGIONAL TRAINING CONTROLS

Requests for all non-Government training and all other training of 8 hours or more must be authorized by appropriate officials. HEW requires regional personnel offices and the regional training officer to review authorized training, either before the fact or on a postaudit basis, to assure that authorizations meet legal, regulatory, and policy requirements. HEW personnel instructions state that regional personnel offices should consult with regional personnel councils to establish systems to assure that this review is made.

The regional director's office requested that offices and agencies submit the required forms for review, but the regional personnel office was not sure that all authorizations were submitted. In fact, FDA and SSA had not submitted training authorizations for review as of November 1975. Also, some forms submitted for review did not have sufficient information for the regional personnel office to determine that the authorized training was useful to the agency and to the employee in performing current or future duties. This was especially true of upward mobility program forms concerning non-Government facilities. For example, one form stated only that the course related to the employee's duties; another stated only that the employee was enrolled in upward mobility. In some instances the individual authorizations for training in non-Government facilities could not be related to training plans because the plans showed only blocks of courses without listing employees or individual courses. HEW headquarters staff members believe the relationship can be made under their new planning system.

The regional training officer is responsible for reviewing training authorization forms. Because he did not sign or initial them to signify that a review had been completed, no assurance existed that submitted forms had been examined. Some fiscal year 1975 authorizations were reviewed, as evidenced by questions raised by the training officer on the need for some courses. He brought these to the attention of the authorizing agency officials or the personnel officer. Only OE responded to his questions, and it agreed that one course was not needed. No action has been taken to correct questionable agency authorization practices.

In addition to our earlier report to HEW headquarters on training weaknesses, we also issued a report to the Congress, "Better Evaluation Needed for Federal Civilian Employee Training" (FPCD-75-120, Aug. 12, 1975), covering activities of the Federal executive departments, including HEW. We made recommendations to CSC for improving evaluations of employee training because statutory and regulatory requirements and past congressional recommendations were not being adequately met.

Although HEW requires regional personnel offices to determine whether each agency training activity meets the agency's needs within the region, the evaluation is not being made. Each agency is also responsible for evaluating the results of training, but only employee self-evaluations of the courses are being made.

BEST DOCUMENT AVAILABLE

The regional director said he will consider (1) setting up a means to identify training for which review is required, (2) establishing a procedure to take corrective action when the regional training officer questions training needs, and (3) developing a system to evaluate the training results.

DETERMINING RELEVANCY OF TRAINING
TO OFFICIAL DUTIES

The questions raised about the propriety of training in Region VIII were primarily applicable to upward mobility training. Executive Order 11478, August 8, 1969, established the framework and goals for the Federal Government's upward mobility program which gives qualified employees an opportunity to fully use their skills and develop their potentials. The Equal Employment Opportunity Act of 1972 supplemented the Executive order by requiring each agency to submit to CSC an affirmative action plan providing for employee training and education. CSC instructed agencies that training and education provided under the act was to be carried out under the authority of title 5, chapter 41, United States Code. Under this part of the code and Executive Order 11348, April 20, 1967, agency management must provide its employees with the necessary training to perform "official duties." That term is defined in the FPM as:

"* * * those authorized agency duties which an employee is currently performing or those which he could reasonably be expected to perform in the future. This includes potential duties in a different job or occupation at the same or higher level than the one currently held by the employee."

Restrictions prohibit

- training for an academic degree in order to qualify for a position for which the degree is a basic requirement,
- training where the sole purpose is to provide an opportunity to the employee to obtain one or more academic degrees, and
- under certain conditions, training an employee in a non-Government facility for the purpose of filling a position by promotion.

Until June 1973 HEW considered the upward mobility program to be oriented toward providing employees academic degrees. In a report to the Congress, "Upward Mobility Programs in the Federal Government Should Be Made More Effective" (FPCD-75-84, Apr. 29, 1975), we reported that most upward mobility programs conducted in 1973 by other departments and agencies also had this orientation and that agencies had often not established target positions or occupations for program participants.

In June 1973 the director, office of upward mobility, at HEW headquarters advised all agency upward mobility coordinators and training officers that upward mobility was not a degree program and that individuals may reach program goals well before a degree was earned. In December 1973 this was reinforced by a memorandum from the Assistant Secretary for Administration and Management to top management officials at HEW headquarters and regional offices. The memorandum directed that a number of actions be taken to strengthen the program and bring it into full compliance with applicable laws and regulations. These included establishing individual career goals for program participants.

These memorandums and other HEW instructions made it clear that upward mobility training was to be related to current or future official duties; however, training instructions did not assure that authorizing officials would make a definite determination that each college course was related to the employee's current or future official duties. Instructions clearly stated only what could not be authorized and allowed officials wide discretion on what training could be authorized. To illustrate, a December 1973 memorandum from the Assistant Secretary for Administration and Management stated:

"Courses taken will be approved on the basis that they relate to the current position or target occupation within the Department. Courses within college curriculums normally pursued to obtain the qualifications, knowledge and skills associated with the target occupational specialty will be approved, except when such courses (e.g. physical education) do not contribute cognitive, specialized or technical skills which are useful in performing the duties of the target position."

Some regional officials said that they were orally instructed by headquarters officials that fine arts courses, as well as physical education courses, could not be authorized.

In December 1973 SSA issued guidelines for approving training which stated that:

"While the subject matter of some particular courses may not relate to the employee's present or future job, other skills learned in the course may relate quite directly. Basic college courses tend to improve student skills in writing, analysis, research, class recitation, etc. For many employees the need to develop cognitive skills will be an important factor in justifying approval of a basic college course under GETA [Government Employees Training Act]. This would be true for basic courses in English, Equal Employment Opportunities, Mathematics, History, Human Relations, Economics, Psychology, Sociology, Philosophy, Political Science, Business or Public Administration, Anthropology, Labor Relations, etc." (Underscoring supplied.)

The FPM provides that a training program's content--including cooperative education programs--should meet identified needs for knowledge, abilities, and skills bearing upon the performance of official duties. It further provides that, wherever feasible, the training objectives reflect the behavior expected of the employee on those tasks which the training is designed to support.

We reviewed 799 training authorizations from June 1974 to April 1975; 358 courses were taken in Government facilities and 441 in non-Government facilities. Two hundred twenty-two of the 441 involved extensive training programs--Upward Mobility College, STRIDE, and ACCESS. One or more regional personnel office officials questioned the usefulness of 140 of the 222 courses, but position descriptions and qualification standards gave some indication that 38 of these courses might be useful, considering current jobs or target occupations in the employees' career development plans. The estimated cost of the 140 courses was \$11,000, which generally covered tuition, book expenses, and fees.

Sixty-five of the 140 courses were in process or completed when career development plans were made. Before September 1974, career development plans were prepared for only a few employees enrolled in Upward Mobility College, STRIDE, and ACCESS. By March 1975 career development plans had been prepared for all except five employees in the ACCESS program.

Based on position descriptions and qualification standards, it was not evident that 102 courses would be useful in enabling employees to better perform official duties. These courses were distributed among the 3 programs as follows:

| <u>Program</u> | <u>Usefulness not apparent</u> | <u>Total reviewed</u> |
|-------------------------|------------------------------------|---------------------------|
| Upward Mobility College | 58 | 139 |
| STRIDE | 15 | 43 |
| ACCESS | <u>29</u> | <u>40</u> |
| Total | <u>102</u> | <u>222</u> |

Examples of courses were:

- A general astronomy course was authorized for an OE secretary who was majoring in education with an upward mobility career goal of being an education program specialist. There was no documentation showing that astronomy related to any duties that would be performed in the employee's present or future occupations.
- A cultural anthropology and two general psychology courses were authorized for a FDA biological technician, who was majoring in biology with a STRIDE career goal of being a microbiologist. There was no documentation showing that these courses related to any duties that would be performed in the employee's present or future occupations.
- Chemistry and zoology courses were authorized for a SSA student employee who was majoring in sociology. The employee was enrolled in ACCESS and had been working in the supplemental security income regional office, but a future occupational goal had not been established for the employee. There was no documentation showing that these courses related to any duties that the employee had performed or might perform in SSA.

Seventy-five of the 102 courses were authorized for SSA employees. SSA officials explained that they could authorize any course except physical education and fine arts courses for employees in upward mobility programs. They also said they could approve almost any course on the basis that it provides cognitive skills. Further, they explained that

upward mobility employees could learn cognitive skills in courses covering subjects not related to the employees' duties, and for this reason such courses could be approved. However, there was no documentation showing what cognitive skill would be learned by any of the employees.

Officials in other agencies gave various reasons for authorizing the remaining 27 courses for their employees. Some thought that almost any college course could be authorized for employees in upward mobility programs; others had not carefully considered what benefits would be attained from the training.

The other 577 courses we reviewed (358 Government and 219 non-Government courses) were authorized for employees who were not enrolled in extended training programs. We identified 13 courses, and regional HEW personnel office officials identified 16 courses, where the usefulness of the benefit to be obtained from the training was not apparent. For example:

--A hatha yoga course was authorized for an SSA operations supervisor. The benefits shown on the training form were that pressures of the present social security insurance situation might be dealt with more successfully. (In June 1974 yoga courses were also authorized for 16 other SSA employees.)

Some agency officials believed that the courses, including the yoga course, were reasonably related to official duties. The estimated cost of the 16 courses, which generally covered tuition, books, and fees, was \$1,000.

CSC and HEW headquarters officials reviewed 36 courses questioned by regional officials. In about half of the cases, they did not find an apparent relationship to official duties. There was some disagreement on the others because of the degree to which certain courses were viewed as having the potential for providing cognitive skills, even though not designed primarily for that purpose.

HEW headquarters officials agreed that some courses for employees in the ACCESS program had no apparent usefulness in relation to duties. They did not agree that this relationship had to be shown for courses taken as part of cooperative education programs. The Deputy Assistant Secretary for Personnel and Training said the ACCESS program was and still is degree oriented and he did not believe that HEW

is required to relate ACCESS training to official duties. The policy section chief for CSC's bureau of training said that all HEW training--including that under the ACCESS cooperative education program--is required to be directly related to official duties. HEW headquarters said it is reviewing all cooperative education programs for Government Employees Training Act and regulatory compliance.

CONCLUSIONS

Not all required training plans were made by the office of the regional director and constituent agencies, and training plans which were prepared were not based on manpower planning surveys.

Some training authorizations were not reviewed. No system existed in the regional personnel office to assure that training authorizations were submitted for review, as required by HEW instructions, to assure that they met legal, regulatory, and departmental requirements. Disagreements were not resolved between authorizing officials and the regional training officer on the propriety of authorizations, and corrective actions were not taken. Evaluations to assess the effectiveness of regional training were not made by the personnel office as required.

The criteria HEW applied in authorizing upward mobility courses, and to a limited extent other training, were of questionable usefulness in assuring that the training was beneficial to the Government. The criteria generally emphasized only what training could not be approved or allowed such wide discretion, particularly in the area of cognitive skill training, that officials authorized training more on the basis that it was not specifically prohibited than on the basis that it would enable employees to better perform official duties. Accordingly, in many instances, the usefulness of training authorized under these criteria was not apparent to us, to HEW regional and headquarters officials, and to CSC personnel knowledgeable in training matters. However, considering that HEW officials acted in good faith in following these criteria when authorizing training, we do not believe that title 5, chapter 41, United States Code, was violated.

Establishing career development plans is an important step for determining the usefulness of training to future official duties, and without this reference such a determination cannot be effectively made. However, SSA had not established career development plans for some regional employees enrolled in the ACCESS program.

RECOMMENDATIONS

To assure that training meets agency needs and employee objectives, we recommend that the Secretary of HEW:

- Insure that training needs are based on manpower plans by providing assistance to the Region VIII personnel office.
- Insure that all Region VIII offices and constituent agencies prepare required annual training plans.
- Instruct the Region VIII regional director to establish procedures and controls to implement HEW instructions for the required review of authorized training at the regional personnel office.
- Insure that disagreements between regional officials on the propriety of authorized training are resolved and appropriate corrective actions taken; if necessary, resolution should be obtained at the headquarters level.
- Insure that the Region VIII regional director implements HEW instructions for evaluating training programs.
- Develop more specific criteria for determining the usefulness of training to official duties to insure that definite, positive determinations will be made in writing by authorizing officials.
- Define "cognitive skills" and then tighten controls on authorizations for cognitive skill courses by requiring documentation that gives the reason that (1) the employee needs the skill and (2) the selected course will best meet the need, particularly when a course not specifically dealing with that skill is selected from among a variety of courses which might provide that skill.
- Provide career development plans for all SSA regional employees enrolled in the ACCESS program.