

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**SURVEYING STAFF TO IDENTIFY
UNNECESSARY INTERNAL CONTROLS**

Methodology and Results



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EXECUTIVE SUMMARY

PURPOSE

The purpose of this inspection was to develop and test a prototype that agencies could use to identify unduly burdensome or unnecessary internal controls.

BACKGROUND

On September 11, 1993, President Clinton signed Executive Order 12861 which required that all executive departments and agencies eliminate 50 percent of their internal controls by 1996. The President signed the Executive Order immediately following release of the National Performance Review which described and detailed the immense time and resources consumed by an over-abundance of internal controls.

In response, Department of Health and Human Services Secretary Donna Shalala instructed her Continuous Improvement Program (CIP) Steering Committee to oversee the reduction of internal controls within the Department. The CIP's work group on internal controls requested the Office of Inspector General's (OIG) assistance in identifying duplicative or unnecessary controls and requirements.

METHODOLOGY

The prototype methodology we developed uses clustered focus groups as well as group and individual interviews with field-level staff to identify internal controls that they believe are burdensome or unnecessary. We tested our methodology with 154 staff working for Public Health Service (PHS) agencies in California, including the Food and Drug Administration and the Indian Health Service. We selected PHS for the case study because of its diversity and complexity.

FINDINGS

Our findings are based on the opinions of the 154 field staff whom we interviewed. We did not attempt to confirm or verify these opinions.

Staff identified 260 internal controls that they believe are unduly burdensome or unnecessary

The controls staff identified generally fall into the three CIP-defined categories: approvals, procedures, and reports. Staff cited several reasons why they believe so many unnecessary internal controls exist.

Most unnecessary controls pertain to approvals and the need for delegations of authority

Approximately 56 percent of the 260 controls that staff believe are unnecessary or unduly burdensome fall into the category of approvals. Staff contend that many unnecessary levels of review and approval exist in their offices, headquarters, and other agencies. In addition to unnecessary program controls, staff cited unnecessary administrative controls in the areas of procurement, budget, travel, personnel, performance evaluation, timekeeping, payroll, and training.

To a limited extent, staff identified both written and unwritten procedures that should be modified or eliminated

Staff identified almost 30 written or unwritten operational procedures they believe should be eliminated or modified. Staff stated that written procedures contain too much extraneous information, are outdated or too difficult to continually update, and/or conflict with other procedures.

Staff believe that many reports and paperwork could be eliminated or otherwise streamlined

Staff identified approximately 85 burdensome or otherwise problematic reports and systems for reporting data as well as unnecessary paperwork that they believe could be eliminated. The most commonly mentioned reports were data reports. These include information on staff and/or agency finances, travel, staffing, inventory, training, and conferences. They also include data reported to headquarters on the performance of the agencies' customers, such as grantees, contractors, firms regulated by FDA, and health care providers funded by PHS. Staff stated that completing these reports takes their time away from the more important tasks of administering public health programs. Finally, some systems that were designed to ease reporting have become more burdensome than helpful.

Approximately 96 percent of participants believe that focus groups are useful for identifying unnecessary internal controls

In order to assess the focus group approach, we asked participants to complete an evaluation form at the end of each focus group. Participants strongly believe that the focus group approach yields high quality information about unnecessary internal controls.

CONCLUSIONS

Focus groups are an effective means of identifying internal controls that may be unduly burdensome or unnecessary; however, the next step is to identify the reason for each control before modifying or eliminating it

The focus group method provides an effective forum for initial identification and discussion of problematic internal controls. It allows internal control reviewers to identify

the controls that cause the most problems for staff--those that most negatively affect their morale and their ability to do their jobs. It also allows reviewers to identify controls that might not have been identified using a "top-down" approach. Finally, it helps clarify *why* staff are concerned about specific controls.

Once the controls are identified, the next step is to determine the reason for each control, take action, and provide feedback to staff. The focus groups provide a starting point for analysis. Obtaining the perspectives of the people who developed, imposed, and oversee each control is important in determining if a control should be retained, modified or eliminated.

Agencies' efforts to reduce internal controls are incomplete without field staff input

Field staff identified controls that headquarters reduction efforts would probably not identify because many of them are operational and do not appear in written procedures. Field staff can contribute valuable information about revising controls that affect them. In addition, the actual process of surveying staff can have positive effects on employee empowerment and morale.

Ongoing efforts to reduce internal controls are necessary to prevent their proliferation

The large number of unnecessary internal controls identified by staff is partially related to the lack of a continuous effort to weed out and eliminate them. An on-going internal controls review effort will be necessary to avert another build-up of unnecessary controls after agencies meet the President's 50 percent reduction requirement.

NEXT PHASES OF THE INSPECTION

This report will be followed by two additional inspection phases, each resulting in a separate report. First, we will provide PHS with a list of *every* internal control identified by staff as unduly burdensome or unnecessary. At the same time, we will develop a methodology to analyze the controls identified by staff and test this methodology using a sample of controls we select in association with PHS and the Office of the Secretary. This methodology should help agencies determine the reason for each control and enable them to decide whether the control should be retained, modified, or eliminated.

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INTRODUCTION

PURPOSE

The purpose of this inspection was to develop and test a prototype that agencies could use to identify unduly burdensome or unnecessary internal controls.

BACKGROUND

On September 11, 1993, President Clinton signed Executive Order 12861 which required that all executive departments and agencies eliminate 50 percent of their internal management regulations and controls by 1996. The President signed the Executive Order immediately following release of the National Performance Review which described and detailed the immense time and resources consumed by an over-abundance of internal controls.

In October 1993, the Office of Management and Budget (OMB) issued instructions to all executive departments for implementing the Executive Order. The OMB instruction stated that "the goal of this reduction effort is to weed out needless internal regulations so that: (1) the outcomes to be achieved in a regulation are clearly articulated; (2) responsibilities for decision making and action are clearly assigned; and (3) oversight can shift from process to outcome." The OMB encouraged agencies to re-examine internal business practices and how these practices can be re-engineered to accomplish necessary reductions.

In response to the Executive Order and OMB instructions, Department of Health and Human Services (HHS) Secretary Donna Shalala instructed her Continuous Improvement Program (CIP) Steering Committee to oversee the reduction of internal regulations and controls within the Department. The CIP's Advisory Group on Organization and Management Structure and Processes established a work group to focus on internal controls. The CIP work group requested the Office of Inspector General's (OIG) assistance in identifying duplicative or unnecessary controls and requirements.

Defining Internal Regulations and Controls

The Executive Order defines internal management regulation as an agency directive or regulation that pertains to its organization, management, or personnel matters. The OMB clarified this definition by stating that, for the purposes of the reduction effort, an internal control is defined as:

...any agency directive, regardless of what you call it, that prescribes agency policies or procedures--including internal agency acquisition regulations and grant management requirements--that pertain to an agency's internal organization, management, or personnel.

The OMB stated that certain regulatory provisions should not be included in this reduction effort. Excluded are provisions that (1) are non-discretionary (i.e. those required by statute, court order, Executive Order, or other external agency directive), (2) promote public information access, and (3) are determined to be necessary for the delivery of "essential services."

The CIP clarified the definition of internal controls for purposes of HHS' reduction effort as:

...any imposition by an organizational unit upon another of a requirement for approval of decisions or activities, guidance or procedures on how to accomplish an assignment or mission, or reporting of information...internal controls include any such imposition, regardless of the origin of the requirement.

For purposes of this study, the term *internal controls* includes all of the elements in both the Executive Order and CIP definitions. For clarity and brevity, we have consolidated these definitions into the following three primary categories:

- ▶ **approvals:** layers of review and approvals;
- ▶ **procedures:** written manuals and guidance as well as unwritten controls such as policies and instructions that have become standard; and
- ▶ **reports:** written or automated reports describing grantee or staff performance, requirements to use specific reporting systems, and paperwork requirements.

Status of Current Reduction Efforts

Since release of the National Performance Review in September 1993, the CIP's Organization and Management Work Group has been focusing its attention on reducing internal controls. Its efforts have targeted (1) refining the task and developing a strategy to achieve the 50 percent control reduction target, (2) issuing guidance to CIP committees and HHS agencies, and (3) conducting analysis and review.

Agencies within HHS are at various stages in their internal controls reduction efforts. The CIP requests that agencies provide them with quarterly reports on the status of their efforts.

This is one in a series of reports prepared by the OIG on the subject of reducing internal controls. It describes the methodology that we used to identify unnecessary internal controls and the general results of our inspection. In subsequent reports, we will describe in more detail the controls that staff identified. We conducted this inspection in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

METHODOLOGY

OVERVIEW

The prototype methodology we developed uses focus groups and interviews with field-level staff to identify internal controls that they believe are burdensome or unnecessary. We devised this approach after reviewing HHS agencies' internal controls reduction efforts which are focused on headquarters-initiated policies, instructions, and requirements.

To test our methodology, we conducted interviews--either individually, in small groups, or in focus groups--with 154 staff working for Public Health Service (PHS) agencies in California. We selected PHS for the case study because of its diversity and complexity. The sample included the PHS regional office in San Francisco, the Food and Drug Administration (FDA) regional office in San Francisco, the FDA district office in Alameda, the FDA resident post in San Jose, and the Indian Health Service (IHS) Area Office in Sacramento. We also interviewed some staff from the IHS district office in Sacramento.

Number of Staff Participating in Focus Groups and Interviews, by Office

Agency	Number of <i>Focus Group</i> Participants	Number of <i>Group Interview</i> Participants	Number of <i>Individual Interview</i> Participants	Number of staff not in sample who provided information (sent letters)	Total Staff Interviewed (and % of all agency staff)
PHS Regional Office San Francisco	10	22	10	0	42 out of 64 (65.6%)
FDA Regional Office San Francisco	9	3	4	0	16 out of 18 (88.9%)
FDA District Office Alameda	29	7	8	0	44 out of 130 (33.8%)
FDA Resident Post San Jose	6	0	2	0	8 out of 10 (80.0%)
IHS Area Office Sacramento (includes district staff)	23	14	5	2	44 out of 81 (54.3%)
TOTAL	77	46	29	2	154 out of 303 (50.8%)

FOCUS GROUP METHODOLOGY

We interviewed half of our sample (77 out of 154) in a total of 15 focus groups. The primary benefit of using focus groups was the quality of information that was generated by free-flowing discussion among staff who perform similar functions. Focus group literature suggests that participants often feel more secure in the focus group setting. Because participants are not required to respond, their statements may be more spontaneous and meaningful. Using focus groups also saves time in identifying unnecessary internal controls. During an hour and a half session, we could collect information from four to eight individuals.

Developing the focus group clusters

We collaborated with each PHS agency to develop the focus group clusters. The focus group literature recommends that groups should be comprised of 4 to 12 people. We decided to limit our focus groups to no more than eight people to ensure that everybody could participate fully.

To form the focus groups, we collected staff rosters from each agency. We clustered staff based on three separate criteria:

- ▶ staff who perform similar duties within the same division or branch (e.g. FDA district office microbiologists who all work in the Laboratory Branch);
- ▶ staff who perform similar duties but work in different divisions or branches (e.g. PHS regional office administrative staff who work in different divisions and branches); and
- ▶ staff who did not perform similar duties but worked in the same division or branch (e.g. professionals of various disciplines working in IHS' Office of Health Programs).

If the total staff in a cluster numbered more than eight--the maximum desired focus group size--we selected a random sample to form the focus group. When we were not able to develop a cluster of at least four staff, we arranged a small group (two or three people) interview rather than a focus group. We conducted small group interviews slightly differently than focus groups. See page 7 for a more detailed explanation.

We made ourselves available to staff who were not selected to participate. After we selected the participants, we sent letters describing the study to all staff, including those who were not selected due to the random sampling. Appendix A is a copy of the letter that we sent. The letters offered everyone the opportunity to call or send electronic mail to us describing unnecessary internal controls. We also offered to meet privately if they wished. We received phone calls from two staff members who asked questions about the study. They did not provide information about unnecessary internal controls.

Scheduling the focus groups

We compared the effectiveness of two methods of scheduling the focus groups. For the PHS regional office, we contacted staff directly to inform them of the scheduled date and time. For IHS and FDA, our liaisons within these offices informed staff of the schedule. Both methods were successful, although each had benefits and drawbacks.

The primary benefit of contacting staff directly is that everyone clearly understood that an outside, impartial group was addressing the issue of internal controls. This can yield beneficial results during interviews because participants may believe there is a greater opportunity for change. We were concerned that staff would not contribute as freely if they believed local agency management was spearheading the effort. The drawback, however, was that staff were not acquainted with us and were hesitant to commit time to meeting with us, although their supervisors were aware we would be contacting them. As a result, scheduling the PHS focus groups was time-consuming, and some participants did not come to their assigned sessions. The staff that attended, however, provided useful information on burdensome and unnecessary internal controls.

Using our agency liaisons to schedule the focus groups was successful but required additional efforts to inform staff that this was an independent assessment of internal controls rather than a PHS effort. Staff informed us they were skeptical that PHS would take action on the issues they identified. Although we were concerned that staff scheduled by PHS would be more hesitant to participate and contribute, we found that these staff were more likely to attend than staff we scheduled and they identified numerous controls they believed were unduly burdensome or unnecessary.

Preparing to conduct the focus groups

Prior to conducting the focus groups, we reviewed literature describing successful focus group practices. The literature suggested that the moderator use a standardized "question route." A question route basically is a combination between a script and a discussion guide. Our question route included the text of our introduction and questions and guided the moderator through each step of the focus group process. It also listed the approximate amount of time we allotted for each phase of the focus group in order to finish in approximately 90 minutes. Appendix B is the question route we used.

The literature stated that we should use unbiased, open-ended questions and probes to evoke discussion from all participants. The literature also helped us develop the checklists we used to procure appropriate supplies and prepare the meeting rooms. See appendix C for the checklist we used and appendix D for tips on conducting focus groups.

Conducting the focus groups

Each focus group session consisted of four phases: introduction, brainstorming, ranking items identified during the brainstorming, and detailed discussion of the top-ranking items. In practice, the focus groups varied in length from 80 to 120 minutes.

Two OIG staff administered each session; one moderated while the other assisted. The moderator was responsible for leading the discussion, ensuring participants did not stray from the topic, and pacing the focus group so it did not exceed the time limit. The moderator also was responsible for assuring that certain participants did not dominate the conversation and that shy or quiet participants were included in the discussion. The assistant recorded the brainstorming session on flipcharts, operated the tape recorder, took notes during the probe session, and observed the participants' body language and expressions. In a few focus groups, we used a third OIG staff person to operate the tape recorder and observe the participants.

Introduction: During the introduction, we briefly described our office, summarized our purpose, and outlined our goals for the focus group. At the beginning of each focus group session, we posted the CIP definition of internal controls and discussed each type--approvals, guidance, and reports--in detail. We also acknowledged that certain controls were useful and necessary, but, for the purposes of this study, we wanted participants to focus on those they believed should be modified or eliminated.

This was a critical time to convince reluctant staff that contributing their ideas was important. We accomplished this by mentioning that the Office of the Secretary had requested the study. We acknowledged that we had no authority to make changes ourselves, but we could make recommendations.

Brainstorming: Referring to the CIP definition, the moderator asked participants to call out any controls they considered unduly burdensome or unnecessary. We went in order of the CIP definition--approvals first, followed by guidance and reports--but told staff they could mention any control as it came to them. The assistant recorded each item on flipcharts.

We asked participants to abide by certain rules when brainstorming. These included:

- ▶ not debating or otherwise discussing other participants' ideas,
- ▶ giving a minimum of explanation so we could get the most out of the time set aside for brainstorming, and
- ▶ speaking one at a time.

See appendix E for the entire list of brainstorming rules.

We allowed 45 to 60 minutes for the brainstorming. At the conclusion, we allowed time for participants to ask each other for clarification of individual items and to consolidate items if they wished to do so.

Ranking: We used a "walk and vote" method to allow participants to rank the internal controls. We gave each participant five uniquely colored stickers and asked them to place the stickers on the flipcharts next to the controls they most strongly believed needed to be modified or eliminated. We told participants they could distribute their votes in any

manner they saw fit. They could use all five votes on one control or they could spread them over several controls.

Assigning each participant a unique color allowed us some flexibility in analyzing the data. First, we were able to determine how strongly the participants felt about each control by tabulating the total number of stickers. Second, it enabled us to obtain a simple count of the number of participants who voted for a specific control by counting the number of colors for each control. The color-coding system also enabled us to identify instances where one person felt strongly about a control so we could direct follow-up questions to that individual.

Detailed Discussion: After participants voted, we discussed in more detail the three items with the most votes. Specifically, we asked:

- ▶ What are the problems with the control?
- ▶ What is the reason for the control?
- ▶ What should be done with the control?
- ▶ Whom should we contact to obtain more information about the reason for the control?

Because this was the first opportunity for participants to debate the merits and faults of the controls, we recorded the discussion using audio tape. We assured participants that they would not be identified by name when we transcribed the tapes.

INDIVIDUAL AND SMALL GROUP INTERVIEWS

When appropriate, we interviewed staff in individual or small group (two or three people) settings. We deemed these settings appropriate when staff held unique positions in an office or when the number of staff performing similar duties was not enough to hold a focus group. Some examples of staff who were interviewed in these settings include most managers, administrative officers, and special consultants. We interviewed 75 staff in 48 separate sessions.

We conducted the interviews almost the same as the focus groups. We used the same questions and probes for the detailed discussion, but we did not use the walk and vote method for ranking. To assure consistency with the focus groups and to limit our discussion to the most significant controls, ranking was based upon the number of participants in the interview:

When there was/were __ participant(s),	we asked them to...
1	<i>"Rank the three controls that you believe most strongly should be changed"</i>
2	<i>"Each rank two controls that you believe most strongly should be changed"</i>
3	<i>"Each pick one control that you believe most strongly should be changed"</i>

FINDINGS

The findings below are based on the opinions of the 154 field staff whom we interviewed. We did not attempt to confirm or verify these opinions.

STAFF IDENTIFIED 260 INTERNAL CONTROLS THAT THEY BELIEVE ARE UNDULY BURDENSOME OR UNNECESSARY

The controls staff identified generally fall into the three CIP-defined categories: approvals, procedures, and reports. Approximately 56 percent of controls pertain to approvals and the need for delegations of authority, 11 percent to procedures, and 33 percent to reporting requirements.

Staff cited several reasons why they believe so many unnecessary internal controls exist. Although staff believe that certain controls are necessary and help ensure consistency nationally, they also believe that agencies are too quick to impose specific controls rather than broader, flexible guidelines. At times, agencies impose--or watchdog agencies recommend--broad or agency-wide controls in response to a single occurrence or unusual situation. In addition, managers at different levels (in both the field and headquarters) sometimes impose controls on the same administrative or regulatory area. Finally, some staff noted that their agencies had never conducted a systematic review of internal controls. As a result, agencies rarely eliminated internal controls, even if they were outdated or no longer necessary.

MOST UNNECESSARY CONTROLS PERTAIN TO APPROVALS AND THE NEED FOR DELEGATIONS OF AUTHORITY

Approximately 56 percent of the 260 controls that staff believe are unduly burdensome or unnecessary fall into the category of approvals. Staff contend that many unnecessary levels of review and approval exist in their offices, headquarters, and other agencies. Staff identified numerous operational controls imposed by headquarters and their own field offices. In addition, they cited unnecessary administrative controls in such areas as procurement (including those imposed by the General Services Administration), budget and finance, travel, personnel, performance evaluation, timekeeping and payroll, and training.

Staff mentioned the negative impact of operational controls imposed by headquarters in three-quarters of all focus group and interview sessions

Staff mentioned more than 35 controls imposed by headquarters agencies that hamper their ability to do their jobs efficiently and provide quality customer service. These pertain to the agency's legal, professional, regulatory, oversight, contracting, and grant activities. Some examples include multiple levels of review at FDA headquarters prior to taking simple regulatory actions, PHS central office policy and controls on using consultants for site visits, and IHS headquarters' role in monitoring self-governance.

In general, staff do not believe the numerous layers of review and approval at the headquarters level are necessary. While staff understand that the role of headquarters is to ensure consistency throughout the country, they described the negative effects of these controls:

- ▶ Delays in decision-making caused by multiple headquarters-level reviews may seriously impact field staff's ability to meet the agency's mission. Lengthy headquarters delays sometimes result in field staff having to redo work.
- ▶ Field staff at times do not believe that headquarters staff know all of the facts when making decisions and therefore do not make the best possible decisions.
- ▶ Some headquarters agencies always approve local recommendations and decisions and therefore do not appear to serve a useful purpose in decision-making.
- ▶ Although one rationale for centralized authority is to ensure that favoritism is eliminated, staff claim that the agency's customers simply bypass the local office and appeal directly to headquarters. Staff believe that the favoritism that was eliminated at the local level is now occurring at the headquarters level.
- ▶ In general, lack of authority has negatively impacted morale and employee empowerment.

Staff identified more than 20 burdensome operational controls that have been imposed by regional, district, or other field office management

Staff described office processes that involve many layers of review and approval similar to those they described in headquarters offices. In other cases, staff simply do not understand why certain top managers (e.g. the IHS area office director or the FDA district director) are required to sign leave slips or sign off as the property manager on small purchases.

Controls on procurement and those imposed by the General Services Administration (GSA) impact staff's ability to do their jobs

Staff from all agencies identified more than 15 controls regarding procurement and GSA. These controls frequently result in staff not having access to appropriate resources in a timely manner.

Staff described an overabundance of local and national controls on procurement. The controls on procuring copiers, computer hardware and software, supplies, copying services, conference facilities, telephone services, repairs, and small purchases in general take time away from staff's normal duties and impact their ability to do their jobs. For the most part, the processes that staff mentioned as burdensome include (1) the multiple approval levels--especially at the local level--even for small purchases, (2) the requirement that staff obtain three bids for goods and services, (3) the paperwork required simply to

request a procurement, and (4) the general inability to obtain needed equipment, supplies, and services in a timely manner.

Staff from all agencies were particularly critical of GSA's procurement and building management controls. They reported that GSA's involvement has resulted in massive delays in relocating offices, delays in procuring what turned out to be a faulty telephone system, inability to obtain emergency building management services, and unnecessary paperwork.

Budget and finance controls are particularly burdensome to mid- and upper-level field managers

Staff from all agencies described unnecessary budget and finance controls at the local and headquarters levels. The major issue is the lack of authority that local mid-level managers have to manage their own budgets. While they are required to submit budgets to manage their offices, they are still required to obtain approval for every expenditure. According to these mid-level managers, local or headquarters management frequently reduce their budgets without consulting or notifying them. Other budget and finance issues include requirements that (1) staff keep budget commitment registers that are not reconciled with agency budget data, (2) agencies use budget software that staff believe is outdated and inadequate, and (3) funds must be recertified by a second staff member for availability in the fourth quarter of the fiscal year.

Agencies require too many approvals for staff to travel on official business and receive travel reimbursement in a timely manner

Staff provided a list of more than a dozen burdensome internal controls regarding travel. Of the 260 unduly burdensome or unnecessary controls identified, the number of review and approval layers for travel orders was mentioned more frequently than any other single control, even though many field staff do not travel for their jobs. Staff described similar problems with the travel reimbursement process, where delays due to multiple approval levels have resulted in instances where staff's credit cards have been cancelled due to non-payment. Other burdensome controls include those limiting staff's ability to obtain blanket travel orders, the number and level of approvals for registration fees and travel to non-agency meetings, and local requirements that staff submit and get approval for a monthly travel plan, even though each trip must be individually approved.

Staff provided approximately 30 examples of unnecessary controls in the area of personnel, performance evaluation, timekeeping, and payroll

Staff from all agencies identified approximately one dozen unnecessary or burdensome personnel-related controls imposed by their agencies and the Office of Personnel Management (OPM). In the area of personnel policy, the issues raised most often were the cumbersome processes to hire and fire, the time required to obtain a new position description due to the multiple layers of review within the agency and OPM, and the

general inconsistency between controls pertaining to PHS commissioned officers and those affecting civil service employees.

Discussions about controls on performance evaluation evoked strong sentiment from staff. When asked to vote for the controls they believed most strongly needed to be addressed, more staff voted for controls regarding the civil service Employee Performance Management System (EPMS) than for any other control. Many staff and managers disagree with the requirement that they must adhere to the strict criteria and format of the EPMS. Some staff believe, in addition, that headquarters control over bonuses and awards severely hampers employee morale.

In the areas of timekeeping and payroll, staff noted several areas where delegations of authority and more freedom to design a flexible system would save time and resources. These areas include the requirement that they use time cards, the process for approving leave, and the controls limiting the field office's ability to implement alternative work schedules.

Certain internal controls limit staff's input on and access to training

Staff identified a few controls that they believe hamper their ability to obtain appropriate training and career development resources. Staff do not understand why so many approvals are necessary on the SF-350 training form, including training officers in headquarters who do not know their training needs. Some staff also believe that the controls in place limit their ability to identify their own training needs and obtain the appropriate training.

TO A LIMITED EXTENT, STAFF IDENTIFIED BOTH WRITTEN AND UNWRITTEN PROCEDURES THAT SHOULD BE MODIFIED OR ELIMINATED

Staff identified almost 30 procedures that should be eliminated or modified. In some cases, staff referred to *written* manuals, guidance, and procedures. In other cases, they described burdensome and inefficient processes for completing tasks that have never been formalized (e.g., written into a manual or memo), but have become required operational standards.

Staff stated that certain written procedures:

- ▶ contain too much extraneous information,
- ▶ are outdated or too difficult to update continually, and/or
- ▶ conflict with other procedures.

In other cases, staff believe that procedures were written or implemented by people who didn't have recent field experience and therefore didn't understand how guidance should have been developed. As a result, certain procedures--such as FDA's processes for sample disposition, analytical worksheets, and check analysis for imports--have become unnecessarily burdensome and time-consuming.

STAFF BELIEVE THAT MANY REPORTS AND PAPERWORK COULD BE ELIMINATED OR OTHERWISE STREAMLINED

Staff identified approximately 85 burdensome or otherwise problematic reports and systems for reporting data as well as paperwork that they believe are unnecessary and could be eliminated. Duplication was a major theme that emerged from the focus groups. Staff painted a picture of uncoordinated reporting systems that take their time away from the more important tasks of administering public health programs.

Although not specifically an internal control, staff overwhelmingly believe that special report requests from headquarters need to be reduced. The requests require that staff stop their normal tasks in order to prepare data that is often already available through other sources. Staff do not understand the purpose of the reports and seldom receive feedback on the results of their efforts.

Completing burdensome or unnecessary reports takes time away from more critical duties

Data reports

Staff identified 50 data reports that should be eliminated or changed. These reports include information on staff and/or agency finances, travel, staffing, inventory, training, and conferences. They also include data reported to headquarters on the performance of the agencies' customers, such as grantees, contractors, firms regulated by FDA, and health care providers funded by PHS.

Staff believe that many of these reports are no longer necessary. In some cases, automated systems have replaced manual systems, but headquarters still requires paper reports. In other cases, regulations or requirements changed, but nobody informed field offices that reports were no longer required.

At times, the rigid, required format of reports wastes time and effort. For instance, although staff routinely complete reports after conducting field visits, they cited instances where they should be allowed to substitute abbreviated reports for full reports. An example is FDA inspection reports where investigators find no violations. Investigators stated that they are required to complete the full establishment inspection report, even though they must write "no action indicated" throughout the entire report.

Employee activity reports

Staff described the burden of completing reports that summarize their activities to supervisors or headquarters. Staff from all agencies believe that monthly, weekly, and even daily reports hurt morale because their existence implies that management does not trust them. In general, both staff and their first-line supervisors believe that the supervisors should monitor staff by being involved in their activities and talking with them rather than by mandating reports.

Some systems that were designed to ease reporting have become more burdensome than helpful

Although staff acknowledged that automation has improved their work lives, they are somewhat dissatisfied with the requirements to use specific systems. During the focus groups and interviews, they described systems that are cumbersome or flawed or require too much information. In other cases, staff contended that commercial software would meet their needs much better than the proprietary software that headquarters requires them to use. Examples of reporting systems that staff believe need to be changed are budget tracking, timekeeping, and employee activity tracking systems.

Headquarters and local management have limited staff's access to certain systems, such as PHS' BHCDAnet and FDA's central file number assignment system. These controls cause delays in completing assignments because staff have to ask authorizing officials to provide information from these systems.

Staff suggest that basic paperwork exercises be reevaluated

Staff questioned the most basic of paperwork requirements: differently colored file copies, sending hard copies after transmitting copies via electronic mail or fax, and requiring hard copies of reports that are available on automated systems. Staff also mentioned instances where paperwork could be reduced if materials were distributed on-line or only to staff who need and use them.

APPROXIMATELY 96 PERCENT OF PARTICIPANTS BELIEVE THAT FOCUS GROUPS ARE USEFUL FOR IDENTIFYING UNNECESSARY INTERNAL CONTROLS

In order to assess the focus group process, we asked participants to complete an evaluation form at the end of each focus group. Specifically, we asked their opinions about (1) how effective the focus group method was for identifying problematic internal controls, (2) whether the focus group concentrated on the most appropriate issue areas, and (3) how the process could be improved.

Participants strongly believe that the focus group process yields high quality information about unnecessary internal controls. Almost all--96 percent--of the participants believe that focus groups are an effective method for identifying problematic internal controls. Approximately one-third of these participants believe that it is *very* effective. In addition, 94 percent of participants believe that the focus group discussion, which was based on the CIP definition of internal controls, concentrated on the most appropriate issue areas.

A few participants suggested changes that they believe would improve the process. Although we sent letters specifically describing the discussion areas to all participants prior to each focus group, several stated that they would have been better prepared if they had received more information and examples of internal controls before the session. Other participants believe that 90 minutes is not long enough for the focus group.

CONCLUSIONS

FOCUS GROUPS ARE AN EFFECTIVE MEANS OF IDENTIFYING INTERNAL CONTROLS THAT MAY BE UNDULY BURDENSOME OR UNNECESSARY; HOWEVER, THE NEXT STEP IS TO FOLLOW UP TO IDENTIFY THE REASON FOR EACH CONTROL BEFORE MODIFYING OR ELIMINATING IT

The focus group method provides an effective forum for initial identification and discussion of problematic internal controls. It allows internal control reviewers to identify the controls that cause the most problems for staff--those that most negatively affect their morale and their ability to do their jobs. It also allows reviewers to identify controls that might not have been identified using a "top-down" approach. Finally, it helps clarify *why* staff are concerned about specific controls.

Once the controls are identified, the next step is to determine the reason for each control, take action, and provide feedback to staff. The focus groups provide a starting point for analysis. Obtaining the perspectives of the people who developed, imposed, and oversee each control is important in determining if a control should be retained, modified or eliminated.

AGENCIES' EFFORTS TO REDUCE INTERNAL CONTROLS ARE INCOMPLETE WITHOUT FIELD STAFF INPUT

Field staff identified controls that headquarters reduction efforts would probably not identify because many of them are operational and do not appear in written procedures. More than half of the controls staff identified involve layers of approval that are unique to a particular agency and, sometimes, to a particular field office. Field staff can contribute useful information about revising controls that affect them. In addition, the actual process of surveying staff can have a positive effect on employee empowerment and morale.

ONGOING EFFORTS TO REDUCE INTERNAL CONTROLS ARE NECESSARY TO PREVENT THEIR PROLIFERATION

The large number of unnecessary internal controls identified by staff is partially related to the lack of a continuous effort to weed out and eliminate them. At the same time, managers and agency watchdogs such as the General Accounting Office and the Office of Inspector General's Office of Audit Services frequently identify vulnerabilities and the need for more internal controls based on reviews of agency programs. An on-going internal controls review effort will be necessary to avert another build-up of unnecessary controls after agencies meet the President's 50 percent reduction requirement.

NEXT PHASES OF THE INSPECTION

This report will be followed by two additional inspection phases, each resulting in a separate report. First, we will provide PHS with a list of *every* internal control identified

by staff as unduly burdensome or unnecessary. At the same time, we will develop a methodology to analyze the controls identified by staff and test this methodology using a sample of controls we select in association with PHS and the Office of the Secretary. This methodology should help agencies determine the reason for each control and enable them to decide whether the control should be retained, modified, or eliminated.

APPENDIX A

LETTER TO PHS STAFF



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

{DATE}

Office of Evaluation and Inspections
50 United Nations Plaza, Room 161
San Francisco, CA 94102

{FIRSTNAME} {LASTNAME}
{AGENCY}
{ADDRESS}
{CITY}, {STATE} {ZIP}

Dear {TITLE} {LASTNAME}:

When Vice President Gore released the National Performance Review (NPR) on September 7, 1993, a lot of Federal employees hoped that it would simplify and improve their work lives by empowering them and eliminating useless red tape. One issue that the NPR addressed was the overabundance of internal controls--requirements, directives, and guidelines--that we must follow, even though they are not required by statute or regulation.

Immediately after the release of the NPR, President Clinton signed an Executive Order requiring that all Federal departments and agencies reduce their internal controls by 50 percent by 1996. Our office--the Office of Evaluation and Inspections within the Office of Inspector General--is assisting the Office of the Secretary in its effort to meet this goal by conducting a national study on internal controls. As part of our study, we are interviewing and conducting focus groups with Public Health Service (PHS) staff in San Francisco, San Jose, Alameda, and Sacramento. Our goal is to provide the Office of the Secretary and PHS {and AGENCY} central offices with the "regional perspective" on internal controls.

But we need your help. We'd like to know your thoughts about the internal controls that you must follow every day--what works, what doesn't work, and what should be changed. This week we'll be scheduling interviews and focus groups with a sample of {AGENCY} staff. We want you to think not only about controls imposed by {AGENCY} but also about controls imposed by other HHS and non-HHS agencies, such as the Office of the Assistant Secretary for Health, the Office of the Secretary, the Regional Administrative Support Center, the Office of Management and Budget, the General Services Administration, and the Office of Personnel Management. Some questions you might want to think about prior to your interview or focus group include:

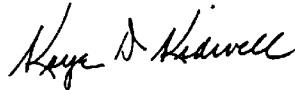
- *Which decisions/approvals are not made at the most appropriate staff or management level?*
- *Are there specific guidelines, procedure manuals, or other directives and memos that are unnecessarily prescriptive? Could they be reduced, simplified, or eliminated?*

- *Are you spending a lot of time completing reports or developing data that seem to disappear once you've submitted them or no longer seem to serve a useful purpose?*
- *What office procedures seem overly bureaucratic?*
- *Can you suggest alternatives to various controls?*

We hope that you will feel free to speak candidly about your experiences and suggestions. Information from all of our interviews and focus groups will remain anonymous. Feel free to call us if you have any questions or concerns about the study or if you would like to discuss certain controls outside of the interview or focus group setting. In addition to our regular office telephone number (415-556-6830), we have a toll-free number (1-800-854-8610) for those of you who would like to call us from outside of the office. When you call, please ask to speak with Brad Rollin or Beth Celniker. We especially hope to hear from those of you who are not randomly selected to participate in the focus groups or interviews.

Your input is vital in our efforts to reduce internal controls. We look forward to talking with you.

Sincerely yours,



Kaye D. Kidwell
Regional Inspector General
for Evaluation and Inspections

APPENDIX B

FOCUS GROUP QUESTION ROUTE

INTERNAL CONTROLS INSPECTION

Question Route--Focus Group Interviews

-0:05 to 0:01

Ragged Beginning with refreshments, name tent, and greeting sheet question

0:01 to 0:05

Thank you for coming today. I am _____ and this is _____ and _____. We are analysts in the OIG Office of Evaluation and Inspections here in Region IX.

As you know from the letter we sent you, our office is working with the Secretary's Continuous Improvement Program in its effort to reduce internal controls by 50 percent by 1996. Our goals are to develop a list of internal controls that PHS staff suggest be changed or eliminated. From this list, we select a few of them, and track them back to their originating office, to determine their current value. Additionally, we are trying to develop a protocol methodology for agencies to identify their own additional controls. We will report on the effectiveness of our using focus groups at at the regional level.

By this point, many of you are probably wondering: "What do you mean by internal controls?" The Continuous Improvement Program has defined internal controls as [POINT TO POSTER] an imposition by an organizational unit upon another of a requirement for approval of decisions or activities, guidance or procedures...or reporting of information. While many of these controls are necessary and help you do your jobs productively, many may not be. We would like to hear from you about those that are not.

We would like to hear, for example, about when there are three signatures required on a memo when it could just be signed by the person who wrote it. Or maybe there are guidelines that are obsolete, or get in the way, or are unnecessary. For example, a computer data system that also has to have a paper form filled out. Or maybe you have data reporting requirements, but it seems that no one ever uses the data you report. For example, the GSA Motor Pool report even though GSA no longer looks at the data.

Our inspection focuses on the "regional perspective" of PHS staff about the internal controls that you have to work with every day. We have two main goals here today:

The first is to develop a list of internal controls in (PHS, IHS, FDA) that you would suggest be modified or eliminated. These may be controls that are unnecessary, overly burdensome, or obsolete. As you can see from this list here, there are many reasons why an internal control may need to be changed or eliminated. [POINT TO POSTER]

INTERNAL CONTROLS INSPECTION

The second goal is to prioritize these controls, to find out which of these most negatively impacts your work productivity and which of these it is most important for us to follow up on.

In a later stage of our inspection, we will focus on some of these internal controls and trace them back to the office or individual who initiated them to determine their current use and value. We will also be sharing the examples provided by all the focus groups and interviews so that PHS and the Office of the Secretary can decide where to focus their internal control reduction efforts.

The reason we've asked you here today is that we want to hear about your first-hand experiences with internal controls in (PHS, IHS, FDA). We're doing this in a group setting so that your ideas can build off of the ideas of others and we can get a wider range of insights. We would like you to think of today's meeting more of as a work group than as an interview.

As you can see, we have a tape recorder set up. We will be taping a later portion of this session. This will allow us to most accurately capture what is said here today. We don't want to miss any of what you have to say. Please understand that although we are recording, your name will not be associated with any remark you make here. So, please feel free to express yourself openly.

We will keep your names confidential. We do not name individuals in our reports.

Does anyone have any questions before we get started?

0:05 to 0:10

Let's get started. I'd like to begin by hearing from each of you. [ALTERNATE BETWEEN THESE TWO QUESTIONS IN SESSIONS]

- 1 *Please tell us your name and what are your most and least favorite parts of your day*
- 2 *Please tell us your name and what comes to your mind when you hear the words "internal controls."*

INTERNAL CONTROLS INSPECTION

0:10 to 0:12

The main thing we'd like to do here today is to develop a list of the internal controls you experience that you believe should be changed or eliminated, maybe because they reduce your productivity or any of these reasons. [POINT TO POSTER] I'll be asking you for examples in several different categories.

[GO OVER THE BRAINSTORMING RULES ON THE POSTER]

Then we will all take a few minutes to think quietly and write down some examples. When thinking about internal controls, think about requirements set upon you from people from your immediate supervisor all the way up to Bill Clinton. The requirements could come from within PHS or outside, even outside HHS, such as OMB, GSA, or OPM controls.

After that, we're going to do some brainstorming. Just call out an internal control that you believe is should be changed or eliminated and _____ will write it down on the flip-chart. You don't need to go around the room in order. I'd like you to keep these rules in mind, however [POINT TO POSTER]

- *Please speak one at a time.*
- *Bring up every idea you have. I understand that some of your jobs are very different from the others in this room. Please make sure to bring up internal controls that apply to you even if they may not apply to the others.*
- *It's ok to mention something if you're not sure if it's required by statute or not.*
- *Do not make value judgements about other people's suggestions. We are trying to get all the ideas down.*
- *Do not explain your example in detail at this point. We will have time for that later.*
- *And finally, it is okay if someone repeats something already said.*

I have three probes that may help you think about specific controls. I'm going to ask about required approvals, then guidelines and procedures, and then reporting requirements. In a final round, we will pick up any controls that don't fit these categories or maybe you didn't get a chance to say in the earlier rounds. But please do not worry about which categories your examples fit into. Bring them up when the occur to you.

To get things started...

INTERNAL CONTROLS INSPECTION

0:12 to 0:20

...I'd like you to think about times when you have had to get written or oral approval for activities or projects. Were there any times when approval had to come from an inappropriate level? (Clarifying probe: Were there any times when approval would have been more appropriate--or more efficient--coming from a lower level?) Let's take a few moments to think of some....OK, some of you look ready to start giving examples.

[AFTER 8 MINUTES OR WHEN SUGGESTIONS DIE DOWN:]

0:20 to 0:28

Now I'd like you to think about the written instructions that guide your work. Are there specific guidance documents, procedure manuals, or other directives and memos that are unnecessarily prescriptive? Or maybe parts of these documents that are too restrictive? Again, you'll have a little quiet time to think....OK, are you ready to give some examples?

[AFTER 8 MINUTES OR WHEN SUGGESTIONS DIE DOWN:]

0:28 to 0:36

Switching now to reporting requirements, are there any reporting or data requirements that you have to fulfill that do not seem worth the effort? Are there any that do not appear to be utilized at all or seem to be obsolete? Take a few moments....Please give examples

[AFTER 8 MINUTES OR WHEN SUGGESTIONS DIE DOWN:]

0:36 to 0:44

So far, we've talked about approval requirements, written guidelines, and reporting requirements. Besides the ones we've listed earlier, do you experience any other internal controls that negatively impact your ability to work productively? Please give examples.

[AFTER 8 MINUTES OR WHEN SUGGESTIONS DIE DOWN:]

INTERNAL CONTROLS INSPECTION

0:44 to 0:52

[CLARIFY EXAMPLES, REMEMBER TO LOOK FOR ONES THAT ARE NOT CLEARLY INTERNAL CONTROLS AND PROBE ABOUT THEM]

Okay, it looks like we have a pretty good sized list here. Before we go on to the next stage, does anyone want to change the wording of any items on the list? [TAKE CARE OF ANY MODIFICATIONS AND ADDED DETAIL.]

Does anyone have any questions about any item up on the lists? [TAKE QUESTION AND DIRECT TO THE PERSON(S) WHO NOMINATED THE ITEM.]

0:52 to 0:57

In this next stage, we want to find out which of the internal controls listed earlier most negatively impact your work productivity. I'd like you to think about which, if any, you would suggest be changed or eliminated altogether. Each of you has five dots, or 'votes.' I'd like you to decide which items are the most important for us to discuss in more detail and then walk over and put your dot next to them. You can use more than one dot on an item, or even all five, if you think it is really important. [WAIT WHILE THEY WALK AND VOTE.]

0:57 to 1:21 [8 MINUTES EACH]

PICK THE THREE TOP VOTE GETTERS FOR FURTHER DISCUSSION. PROBE ON EACH:]

What are the problems with this control? Why has it been given as an example of a control that should be modified or eliminated? Does it reduce your ability to do your job productively? [REFER TO POSTER]

*What is the reason for the control?
[PROBE: Does the control accomplish its purpose?]*

What do you suggest be done with this internal control? Vote: Keep it, Modify it [PROBE: HOW?], or Eliminate it. It's OK not to vote if you don't know or don't have an opinion.

What office or what person should be contacted for more information about this internal control?

[IF THERE IS ENOUGH TIME REMAINING, RUN THROUGH THE PROBES ON ANOTHER INTERNAL CONTROL FROM THE LIST.]

Is there another internal control on the list that any of you would like to discuss in more detail now?

INTERNAL CONTROLS INSPECTION

1:21 to 1:25

[IF THE PROBES WERE NOT RUN THROUGH ON ALL NOMINATIONS, SAY:] *I recognize that we did not have time today to discuss all of the controls you listed. We might want to be able to contact some of you, however, to learn more details about these remaining controls. Does anyone want to be the contact person for this one? How about this one? etc. [WRITE DOWN THE NAMES OF THE PEOPLE TO BE RECONTACTED.]*

1:25 to 1:29

Our time is about up, but before we close, I'd like to give you an opportunity to say anything else you have on your mind. Do you have anything else to add?

1:29 to 1:30

Thank you for your input today. Your ideas will be reflected in our report to the Secretary's Continuous Improvement Program. This report will be available at the end of this Calendar Year.

I will be happy to talk with any of you to talk in further detail about internal controls. We can meet briefly now, you can call either _____ or me at 415-556-6830, and we also have a toll-free number you can call 1-800-854-8610.

Please remember to fill out the evaluations.

Again, our thanks go to each of you for participating in today's discussion.

[IF AT THE END OF THE DAY:] *Feel free to help yourselves to the remaining refreshments before you go.*

APPENDIX C

FOCUS GROUP CHECKLIST

INTERNAL CONTROLS: MATERIALS CHECKLIST FOR INTERVIEWS

Interview component: _____

Location: _____

Days at Location: _____ Dates: _____

Focus Group Sessions: _____ # People in Focus Groups: _____

Small Group Sessions: _____ # People in Small Groups: _____

Individual Interviews: + _____ # Individuals: + _____

Total # Sessions: = _____ Total # People: = _____

INTERNAL CONTROLS Materials needed checklist	# NEEDED	# READY
MATERIALS NEEDED FOR ALL INTERVIEWS		
Materials for OIG participants:		
Schedule of people to be interviewed in which setting	1 each	
Question route for focus group	1 each	
Question route for individual and small group interviews		
Questionnaire pages for probes (several for each session)		
Notepads for notetakers	1 each	
Business cards		
Room arrangements (make a check in the ready column)		
Travel arrangements (make a check in the ready column)		
MATERIALS NEEDED FOR SMALL GROUP AND INDIVIDUAL INTERVIEWS		
Hand-out pages:		
CIP Internal Controls definition on 8.5 by 11		
Internal control attributes that prompt elimination or modification on 8.5 by 11		
Internal Controls list developing worksheets by 4 categories		
MATERIALS NEEDED FOR FOCUS GROUP INTERVIEWS		
Clock with easy to read minute display	1	
Posters:		
Greeting sheets	2	
CIP Internal Controls definition poster	1	
Ground rules poster	1	
Internal control attributes that prompt elimination or modification	1	

Recording devices:		
Tape recorder	1	
Two-prong to three-prong adapter	2	
Extension cord	1	
Omni-directional microphone	1	
Tapes, labeled and cued (have an extra for each session)		
Flipchart:		
Portable easels	2	
Pads of lined flipchart paper	2	
Colored marking pens	10	
Rolls of masking tape	2	
Large binder clips	6-8	
Materials for focus group respondents:		
Name tents		
Colored dots (cut into sets of five dots)		
GSA ball-point pens		
Notepads		
Refreshments:		
Coffee		
Thermos-server	1	
Coffee cups, Stirrers, Napkins, Straws		
Sugar, Sweet & Low, and Creamer		
Sodas		
Tray	1	
Cookies or muffins, fruit		

APPENDIX D

TIPS ON FOCUS GROUPS

FOCUS GROUPS: TIPS FOR MODERATOR AND ASSISTANTS*

All should make sure the environment is non-threatening. Use a conversational, rather than authoritative, tone. Before discussion starts, have purposeful small talk and ragged beginning. Moderator and assistants should avoid any body language that signals approval or disapproval. Avoid head nodding. Avoid giving your personal opinions. Avoid comments like "excellent" or "great" when somebody expresses an idea.

Moderator should have question routine memorized. Practice beginning and closing remarks. Remember the questions, probes, and transition remarks so you don't have to refer to notes. Moderator should remember the time limit. Stay within the number of minutes suggested.

Moderator should identify the talkative and reticent participants. Draw in reticent participants, maybe through establishing eye contact. Moderator should not rush in with the next question if there is a minor lull, because people may be taking turns to say what they want. Use a 5 second pause.

Tape record the discussion. Decide in advance who will be responsible for operating the tape recorder. Have extra cassettes readily available. Occasionally check the machine to see that the reels are moving. Keep track of time lapses so you can change the tape before you lose any of the discussion (e.g. if everyone is quiet during the time we tear off a flip-chart page to tape it on the wall).

During brainstorming, assistants will **legibly** write down brainstormed items on flip-charts. Flip-charts are responsible for making changes or corrections to the items during the clarification stage.

Assistants should take notes when not in a flip-chart exercise. Moderator should not take extensive notes. Assistants should sit where they can observe all participants. One should sit near the door, if possible, in case someone comes in late. The assistants should also jot down non-verbal statements, like a nod of agreement or a shake of disapproval. If there is a round-table response to a question (or a vote), tally those responses.

Assistants are responsible for writing in the information learned in the probe section. They should have enough probe guides available to them. Although we have scheduled time for three probe series, it is possible that we have time to do more, so bring extras. Assistants should make sure they write in the name of the internal control being discussed on the correct probe guides.

If someone arrives after the session begins, meet the person at the door, take them outside of the room and give them a short briefing as to what has happened and the current topic of discussion. Then bring the late participant into the room.

All should discuss and write a summary immediately after the session.

* *This list was developed using materials provided during a training session of Office of Evaluation and Inspections staff by Richard A. Krueger, Ph.D., of the University of Minnesota*

APPENDIX E

BRAINSTORMING RULES

THINK...THEN BRAINSTORM

Think:

- ~ Take a few moments at first to think of some examples. Use the scratch paper if you like.
- ~ Think about controls at all levels—from your direct supervisor on up to President Clinton.

Brainstorm:

- ~ There is no need to go around the room in order. Just call out your example.
- ~ Please only talk one at a time, so we can write down everyone's examples.
- ~ Offer every idea that comes to you.
- ~ Do not worry if your example is mandated by statute or not. We will have time to find that out later.
- ~ Do not judge ideas. Do not express approval or disapproval for the statements of others during brainstorming. We will talk about them later.
- ~ Give a minimum of explanation during brainstorming. There will be time to clarify later.
- ~ It is alright to repeat something already said.