



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF THE INSPECTOR GENERAL

**March 22, 2004**

### INSPECTION MEMORANDUM

To: Phil Maestri  
Director, Management Improvement Team  
Office of Deputy Secretary

From: Cathy H. Lewis  
Assistant Inspector General  
Evaluation, Inspection and Management Services

Subject: Review of Blueprint for Management Excellence item number 172  
(ED/OIG I13E0008)

This memorandum provides the results of our inspection of one Action Plan item from the Department of Education's (Department's) Blueprint for Management Excellence. We are examining several Action Plan items related to Human Capital. Our objective is two-fold: 1) was the item completed as described; and, 2) as completed, does the action taken help the Department towards its stated Blueprint objective. In this report, we examined Action Item Number 172 concerning the annual review of position descriptions by rating officials.

#### Background:

Each Department employee is assigned to a position description (PD). Given the Department's revised performance evaluation system and its emphasis on accountability, it is important that position descriptions provide an accurate statement of the employee's job, including all current responsibilities. With this in mind, the MIT developed an Action Item to require a yearly review of position descriptions. Specifically, Action Item Number 172 requires each Assistant Secretary to:

**“Establish a process to ensure that rating officials annually review PDs of their staff to ensure the PD accurately covers all of the employees duties and responsibilities.”**

The comments field on this item states, “Completed 6/18/02. This item was addressed through the One-ED report.”

### **Objective 1: Was the action item completed as described?**

The One-ED Report does not establish a process, or direct Assistant Secretaries to establish a process, to monitor position descriptions on an annual basis.

The annual position description review is a line management responsibility, to be carried out by the rating officials in each principal office. The designated action owner is each Assistant Secretary. According to the MIT, this Blueprint item was addressed through the One-ED Report. The One-ED report makes no mention of this requirement. Although this is not reflected in the MIT report on this action item, it has been suggested that the item was closed because the One-ED Strategic Investment Process (SIP) includes a review of position descriptions. We found no evidence that such a review was done as part of Phase I of the One-ED process to ensure that employee's duties and responsibilities were accurately reflected in their PD. The MIT acknowledged that position descriptions were not reviewed as a part of the Strategic Investment Process, and updates that may result from future implementation of One-ED reengineer solutions will not result in annual updates of every employee's position description. Furthermore, HRS stated that there is no policy that directly requires supervisors to update position descriptions.

As part of our inspection activities, we surveyed the Department's executive officers to determine if they were aware of this requirement. None of the executive officers were aware of any current initiative to ensure that an annual review of employee position descriptions took place.

### **Objective 2: Did the actions completed meet the objective "To improve the strategic management of the Department's human capital?"**

This action item was not completed.

#### **Recommendations:**

The EMT should either designate this item as "closed" if it feels it is not required any longer or, if the EMT believes this item is still necessary, the Action Item Number 172 should be re-designated as "open" and a process identified to ensure the action is initiated and completed on an annual basis.

#### **Department Response:**

The MIT concurs that this action item was not completed as intended. As a result, the MIT will record Action Item Number 172 as "closed" rather than "completed" and will note the change in the comments section of the *Blueprint* action item.

We have not modified our recommendation based on the Department's response.

We appreciate the cooperation given to us during the inspection.

March 10, 2004

To: Cathy H. Lewis  
Assistant Inspector General  
Evaluation, Inspection and Management Services

From: Phillip Maestri, Director  
Management Improvement Team

Subject: Draft Inspection Memorandum (1/6/04)  
Review of MIT Action Item Number 172 (ED/OIG I13E0007)  
“Process for rating officials (to) annually review position descriptions”

Thank you for the opportunity to review and comment on a draft version of this inspection memorandum.

### **Comments on Background and Findings**

In response to your draft memo, the Management Improvement Team (MIT) reviewed the activities associated with the review of position descriptions. As OIG found, the MIT recorded blueprint action item #172 as “completed” based on the completion of the One-ED report. The report contained a plan for a Strategic Investment Process that, through re-engineering business processes, would change the work individuals perform. With the implementation of re-engineered work processes, any changes in duties will need to be reflected in updated position descriptions. However, the MIT acknowledges that the implementation of One-ED has not always been accomplished as originally envisioned and position descriptions were not reviewed during the Strategic Investment Process. Furthermore, updates to position descriptions that may result from future implementation of One-ED reengineered solutions will not result in **annual** updates of **every** employee’s position description because One-ED reviews occur periodically and affect only a fraction of employees.

In response to the OIG findings, the MIT asked the Human Resource Service (HRS) to advise us on the current situation. HRS advises that there is no policy that directly requires supervisors to update position descriptions. However, managers are responsible for ensuring the accuracy of position descriptions. This requirement is referenced in Personnel Manual Instruction 511-1 (Employee Position Classification Appeals), which provides:

- Assignment of duties and responsibilities as documented in official position descriptions is a management responsibility. (Paragraph IV)

- Ultimately, the supervisor has the final authority to determine the duties and responsibilities to be reflected in the position description, and to explain the basis for the classification of the position to the employee. (Paragraph V-B)

5 CFR 511.607(a)(1) states:

- When the accuracy of the official position description is questioned by the employee, the employee will be directed to review this matter with his or her supervisor.

Furthermore, HRS advises that, in the staff's judgment, a yearly review of position descriptions is not necessary for three reasons. First, Principal Offices reorganize frequently. In the year 2003, there were 25 reorganizations. A key step in the reorganization process requires management to review position descriptions of employees affected by the reorganization. If employees' position descriptions do not accurately describe the duties and responsibilities to be performed in the new organization, management *must* submit new position descriptions. Second, supervisors assign the vast majority of employees to standard, generic position descriptions. These descriptions are written in broad terms and cover the major, grade-controlling aspects of positions in the occupational series. Third, the EDPAS performance appraisal system requires managers to develop standards with employees. If the position description is inaccurate, that fact should be apparent when the manager and employee develop the standards for assessing the employee's performance.

### **Response to recommendations**

The MIT concurs that this action item was not completed as intended. As a result, the MIT will record action item #172 as "closed" rather than "completed" and will note the change in the comments section of the *Blueprint* action item.