

U.S. Department of Labor

Office of Inspector General—Office of Audit

BUREAU OF LABOR STATISTICS



BLS CONTROLS OVER TRAINING DATA COLLECTION WORKERS NEED STRENGTHENING

Date Issued: March 30, 2012
Report Number: 17-12-004-11-001

BRIEFLY...

Highlights of Report Number **17-12-004-11-001**, issued to the Acting Commissioner for the Bureau of Labor Statistics.

WHY READ THE REPORT

The Office of Field Operations (OFO) within the Bureau of Labor Statistics (BLS) is responsible for collecting nationwide economic survey data for the following BLS divisions: Industrial Price Surveys (DIPS), National Compensation Surveys (DNCS), Consumer Price Surveys (DCPS), and Cooperative Survey Programs. OFO is responsible for designing training programs to provide data collectors with the tools they need to collect data for BLS Surveys.

WHY OIG CONDUCTED THE AUDIT

The audit objective was to answer the following question:

Did OFO provide required training to data collectors to ensure they were prepared to accurately collect data for use in BLS surveys?

READ THE FULL REPORT

To view the report, including the scope, methodology, and full agency response, go to: <http://www.oig.dol.gov/public/reports/oa/2012/17-12-004-11-001.pdf>

March 2012

BLS CONTROLS OVER TRAINING DATA COLLECTION WORKERS NEED STRENGTHENING

WHAT OIG FOUND

While OFO was able to demonstrate it provided entry-level classroom training at the national office, OFO could not demonstrate that it provided all required training to data collectors to ensure they were prepared to accurately collect data for use in BLS surveys. OFO did not maintain sufficient documentation to support that it had provided required refresher training to DIPS and DNCS data collectors, and could not demonstrate that DCPS data collectors had been provided required on-the-job (OJT) training in their respective regional offices.

OFO had training policies and procedures in place, but they required maintenance of only OJT training documentation. Furthermore, OFO did not fully monitor its regional offices to ensure they maintained adequate documentation to substantiate that they had provided the required training. As a result, OFO could not be fully assured that data collectors were adequately trained and fully understood their role.

WHAT OIG RECOMMENDED

We recommended that the Acting Commissioner for the Bureau of Labor Statistics ensure OFO implements a common learning management system which will promote improved record keeping for training, and improves the monitoring of regional offices to enforce the maintenance of OJT training records to fully support that they have provided required training to entry-level data collectors.

The Bureau of Labor Statistics agreed with our recommendations to improve record keeping and monitoring of its data collector training programs. However, BLS disagreed with portions of the findings in the report regarding records of training completion.

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U.S. Department of Labor

Office of Inspector General
Washington, D.C. 20210



March 30, 2012

Assistant Inspector General's Report

John M. Galvin
Acting Commissioner
Bureau of Labor Statistics
U.S. Department of Labor
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2 Massachusetts Avenue, NW
Washington, DC 20212

The Office of Field Operations (OFO) within the Bureau of Labor Statistics (BLS) is responsible for collecting nationwide economic survey data for the following BLS divisions: Industrial Price Surveys (DIPS), National Compensation Surveys (DNCS), Consumer Price Surveys (DCPS), and Cooperative Survey Programs (DCSP). OFO is responsible for designing training programs to provide data collectors with the tools they need to collect data for BLS Surveys. OFO consists of the national office and six regional offices. The national office provides technical direction, classroom training for entry-level data collectors, and refresher training for advanced data collectors. The regional offices provide on-the-job training (OJT) to entry-level data collectors, certify data collectors, and execute survey collection.

We conducted an audit of the BLS OFO to answer the following question:

Did OFO provide required training to data collectors to ensure they were prepared to accurately collect data for use in BLS surveys?

We reviewed a statistical sample of training files in DIPS, DNCS, and DCPS for entry-level data collectors for Fiscal Years (FY) 2007 through the first two quarters of 2011, and advanced data collectors for FYs 2010 through the first two quarters of 2011.

We interviewed OFO national and regional officials for each division to gain an understanding of the survey data collector training requirements and the monitoring controls. We identified BLS training requirements for entry-level and advanced data collectors and reviewed classroom training records to determine adherence to these requirements. We also reviewed OJT records for entry-level data collectors in four regional offices (San Francisco, Philadelphia, Atlanta, and Chicago) to confirm the employees' successful training completion and certification.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS) for performance audits. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objective. Our objective, scope, methodology, and criteria are detailed in Appendix B.

RESULTS IN BRIEF

OFO could not demonstrate that it provided all required training to data collectors to ensure they were prepared to accurately collect data for use in BLS surveys. OFO was able to demonstrate it provided entry-level classroom training at the national office. However, OFO did not maintain sufficient documentation to support that it had provided required refresher training to DIPS and DNCS data collectors, and could not demonstrate that DCPS data collectors had been provided required OJT training in their respective regional offices. While OFO had training policies and procedures in place, they only required that documentation for OJT training be maintained. Furthermore, OFO did not fully monitor its regional offices to ensure they maintained adequate documentation to substantiate that they had provided the required training. As a result, OFO could not be fully assured that data collectors were adequately trained and fully understood their role.

We recommended that the Acting Commissioner for BLS ensure OFO implements a common learning management system which will promote improved record keeping for training; and improves the monitoring of regional offices to enforce the maintenance of OJT training records to fully support that they have provided required training to entry-level data collectors.

In response to our draft report BLS stated it supported the recommendations in the report, but disagreed with portions of the individual findings. BLS considered OFO to have submitted reasonable documentation of training completion for advanced data collection staff. BLS also expressed concern over the inclusion of data collectors who took advanced training and the incidence rate of DCPS OJT files that were cited as exceptions. BLS's entire response is included in Appendix D.

We disagree that the documentation provided by OFO was reasonable to document the attendance and completion of training for advanced data collection staff. OFO could not substantiate that the scheduled attendees listed actually attended and completed the training. OFO officials said supervisors ensured that listed attendees completed the training. However, we did not find sufficient documentation to demonstrate that this had occurred.

We also disagree that the inclusion of data collectors who took advanced training was incorrect. The BLS training curriculum includes advanced training on complex collection

procedures, workshops, methodological changes, or informational sessions, as a part of refresher training. As advanced training is a component of refresher training, it was appropriately included.

In addition, the DCPS OJT exceptions were based on our sampling methodology, which was based on reviewing individual data collectors' training files, not instances of documentation. Each survey data collector is required to demonstrate the successful completion of OJT through the documentation of interim and final certification to become certified to collect data for use in BLS surveys.

RESULTS AND FINDINGS

Objective — Did OFO provide required training to data collectors to ensure that they were prepared to accurately collect data for use in BLS surveys?

Documentation to fully support the training of data collectors was lacking.

OFO could not demonstrate that it provided all required training to data collectors to ensure they were prepared to accurately collect data for use in BLS surveys. OFO was able to demonstrate that it provided entry-level classroom training at the national office. However, it did not maintain sufficient documentation to support that it had provided required refresher training to DIPS and DNCS data collectors. Furthermore, when entry-level data collectors went to their regional offices after completing initial training at the national office, OFO was unable to demonstrate that the regional offices had provided DCPS data collectors required OJT training.

Finding 1 — OFO could not demonstrate that advanced data collectors attended and completed refresher training.

Our review of 143 files for training provided at the national office to entry-level data collectors showed adequate support that OFO had provided the required training. However, this was not the case when OFO offered refresher training¹ to advanced data collectors. We reviewed 162² training files for advanced data collectors and found that BLS could not demonstrate that the training was provided to any of the 102³ DIPS or DNCS data collectors reviewed. Conversely, in the case of DCPS, documentation supported that training was provided to 57 of the 60 DCPS advanced data collectors we reviewed.

¹ Per the BLS OFO Training Curriculums, dated May 2, 2011, the nature of training conducted during a refresher course varies. It may be advanced training on complex collection procedures, workshops designed to get input on proposed system development or methodological changes, or informational sessions on new features of the programs.

² 162 files = 42 DIPS, 60 DNCS, and 60 DCPS

³ 102 files = 42 DIPS (21 FY 2010 Refresher Training files and 21 FY 2011 Advanced Training files), 60 DNCS (30 FY 2010 Refresher Training files and 30 FY 2011 Refresher Training files)

Refresher training is conducted for DIPS, DNCS and DCPS data collectors. However, training differs for each division, as follows:

DIPS refresher training may be advanced training on complex collection procedures, workshops designed to get input on proposed system development or methodological changes, or informational sessions on new features of the programs.

DNCS refresher training is used to prepare staff to handle upcoming initiatives and industries (e.g., Governments, Domestic Partner Emerging Benefits, Benefit Documents) before collection begins.

DCPS refresher training is e-learning modules designed to ensure that data collection skills are maintained through their careers.

DIPS and DNCS generally provide a three-day, in-person refresher training course. However, when budget constraints create training limitations, they are able to provide structured refresher training in a webinar format in their respective regional offices. Alternatively, DCPS generally provides refresher training to its advanced data collectors using an on-line course.

OFO officials stated that they maintained documentation for attendance at required refresher training for DIPS and DNCS advanced data collectors using lists of attendees and supervisor observations. However, OFO could not substantiate that the scheduled attendees listed actually attended and completed the training. OFO officials said supervisors ensured that listed attendees completed the training. However, we did not find sufficient documentation to demonstrate that this had occurred. As a result, OFO could not provide assurance that DIPS and DNCS advanced data collectors had attended and completed required refresher training.

Conversely, because DCPS provided refresher training using an on-line format, the electronic Learning Management System automatically recorded the data collectors' training activity, including all attempts and completions.

OFO did not have established policies and procedures for maintaining documentation to support that advanced data collectors had completed required refresher training. OFO officials acknowledged that their documentation could be improved with additional registration steps, such as participant sign-in sheets and/or the submission of supervisor documentation.

Standards of Internal Control in the Federal Government issued by the Government Accountability Office states:

Control activities occur at all levels and functions of the entity. They include a wide range of diverse activities such as approvals, authorizations, verifications, reconciliations, performance reviews,

maintenance of security, and the creation and maintenance of related records which provide evidence of execution of these activities as well as appropriate documentation. Control activities may be applied in a computerized information system environment or through manual processes.

Without maintaining documentation of the successful completion of refresher training, OFO cannot be fully assured that data collectors are adequately trained on changes to complex collection procedures and updates to best practices and collection aids.

Finding 2 — OFO could not demonstrate the successful completion of OJT training.

Our review of 93⁴ files for entry-level OJT training at four regional offices found that discrepancies in record keeping were tied organizationally, not regionally. For example, we noted no exceptions in the 28 DIPS and DNCS files reviewed, but identified exceptions for 41 of 65 files reviewed (63 percent) in DCPS (see Exhibit). Specifically, we found the following at each of the four DCPS regional offices:

- San Francisco – 14 of 24 files lacked one or more required documents. OJT checklists were missing in 5 files and not signed in 1 file; OJT interim certifications were missing in 4 files and not signed in 5 files; and OJT final certifications were missing from 3 files and not signed in 3 files.
- Philadelphia – 6 of 13 files lacked one or more required documents. OJT checklists were missing in 4 files; OJT interim certifications were not signed in 3 files; and OJT final certifications were not signed in 3 files.
- Chicago – 12 of 16 files lacked one or more required documents. OJT checklists were missing in 5 files and not signed in 4 files; OJT interim certifications were missing in 5 files and not signed in 2 files; and OJT final certifications were missing from 5 files and not signed in 2 files.
- Atlanta – 9 of 12 files lacked one or more required documents. OJT checklists were missing in 8 files; OJT interim certifications were missing in 2 files; and OJT final certifications were missing in 3 files.

OFO training policies and procedures required regional offices to maintain documentation that supports the successful completion of OJT training.

According to the Consumer Price Index (CPI) Data Collection Quality Program (DCQP) Manual:

⁴ 93 files = 19 DIPS, 9 DNCS, and 65 DCPS

The completion of OJT requirements is documented on the OJT checklist used to authorize the employee for independent collection. The BLS supervisor and data collector sign and date the form in the appropriate signature field. Both parties must agree that the employee has been sufficiently trained on the OJT checklist skills to move to independent collection. Documentation is handled either by a supervisor or by a Field Economist mentor in consultation with a supervisor.

Interim certification indicates that the trainee is capable of collecting the survey without constant review. Interim certification is earned after an observation that results in meeting the DCQP requirements. Once met, the employee and supervisor signs and dates the observation summary form in the appropriate areas. After the successful completion of interim observations, a set of re-interviews are completed. If all of these activities indicate the employee's work meets the DCQP requirements, final certification is earned. Final certification observations are conducted during the second full independent collection month. They must be conducted by a supervisor. The supervisor and employee sign and date the re-interview summary form in the appropriate areas after successful completion.

Although policies and procedures for documenting OJT training were in place, OFO did not fully monitor the four regional offices to ensure they maintained adequate documentation to substantiate that data collectors had been provided the required training. As a result, OFO could not be fully assured that data collectors were adequately trained and fully understood their role.⁵

RECOMMENDATIONS

We recommend that the Acting Commissioner for BLS:

1. Ensure that OFO implements a common learning management system, which will promote improved record keeping for training.
2. Ensure that OFO improves the monitoring of regional offices to enforce the maintenance of OJT training records to fully support that they have provided required training to entry-level data collectors.

⁵ Our audit results are based on only the samples reviewed. We did not project those results to all training files in the universe because of the high rate of error found in our sample.

We appreciate the cooperation and courtesies that BLS personnel extended to the Office of Inspector General during this audit. OIG personnel who made major contributions to this report are listed in Appendix E.



Elliot P. Lewis
Assistant Inspector General
for Audit

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Exhibit

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Exhibit

DCPS Missing OJT Documentation

No.	OJT Checklist not Signed	Interim Certification not Signed	Final Certification not Signed	OJT Checklist Missing	Interim Certification Missing	Final Certification Missing
SF1	√	√				√
SF2					√	
SF3					√	
SF4				√		
SF5		√				
SF6				√		
SF7					√	
SF8		√	√			
SF9		√	√			
SF10				√		
SF11						√
SF12		√	√			
SF13				√		
SF14				√	√	√
TOTAL	1	5	3	5	4	3
PH1		√	√	√		
PH2				√		
PH3		√	√			
PH4		√	√			
PH5				√		
PH6				√		
TOTAL	0	3	3	4	0	0
CH1		√	√			
CH2				√	√	√
CH3				√		
CH4		√	√	√		
CH5	√				√	√
CH6				√		
CH7	√					
CH8				√	√	√
CH9	√					
CH10					√	√
CH11					√	√
CH12	√					
TOTAL	4	2	2	5	5	5
ATL1				√		
ATL2				√	√	√
ATL3				√		
ATL4				√		
ATL5				√	√	√
ATL6				√		
ATL7				√		
ATL8				√		
ATL9						√
TOTAL	0	0	0	8	2	3

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Appendices

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Background

BLS is responsible for the production of some of the most sensitive and important economic data. BLS is an independent national statistical agency that collects, processes, analyzes, and disseminates essential statistical data to the American public, the U.S. Congress, other federal agencies, state and local governments, and businesses. BLS also serves as a statistical resource to DOL. BLS data must satisfy a number of criteria, including relevance to current social and economic issues, timeliness in reflecting today's rapidly changing economic conditions, accuracy and consistently high statistical quality, and impartiality in both subject matter and presentation. It provides statistics that support the formulation of economic and social policy, decisions in the business and labor communities, legislative and other programs affecting labor, and research on labor market issues. These policies and decisions affect virtually all Americans.

OFO offers training for the following BLS divisions: DIPS, DCPS, DNCS, and DCSP. OFO's rigorous and structured program-related training, and mentor and certification programs are designed to provide regional data collection staff with the tools they need to collect high-quality data for BLS surveys.

OFO consists of the national office and six regional offices. The OFO national office provides overall operations planning and allocates workloads and resources to the OFO regional offices.

BLS national office training courses must be successfully completed before entry-level data collectors are permitted to start independent data collection in the region to which they are assigned. The classes completed in the national office are designed according to the program assigned. OJT training, certification, and structured mentor training regimens are conducted in the regions and are designed to build upon the formal training completed in the national office for entry-level data collectors. BLS courses for advanced employees are called refresher courses, which are designed to update program data collection requirements, specific procedural, industry, and/or refresh or update their certification and skill-levels needed to perform data collections for the surveys.

DIPS develops and monitors training for employees who collect data used for the Producer Price Index (PPI) and the International Price Program (IPP). The training reflects the fact that regional Industrial Prices Field Economists are responsible for collecting initiation data for both the PPI and IPP surveys.

DNCS develops and monitors training for staff that collects data that is used for the National Compensation Surveys, which includes Employment Cost Index, Employer Costs for Employee Compensation and Employee Benefit Survey. The training includes on-going needs assessments and continual evaluation of offered courses, design of new course curriculum and updates of current courses to reflect changing technical

procedures and innovation in content delivery to reflect just-in time distance education. DNCS offers a program of classroom and distance education to support on-the-job training and certification for Field Economists. The technical training courses involve procedures, collection methodologies, and techniques for initiating new companies into the DNCS Survey and updating them quarterly.

DCPS offers training to support data collection and quality activities for the Commodity and Services and Housing Surveys.

DCSP provides training for OFO and state staff on the seven Labor Market Information and Occupational Safety and Health Statistics programs. Trainings are typically program-specific and are delivered at the introductory, intermediate, and advanced levels. DCSP utilizes several modes for delivering training, including classroom, WebEx, recorded WebEx (on demand training), and computer-based training.

Objective, Scope, Methodology, and Criteria

Objective

Did OFO provide required training to data collectors to ensure they were prepared to accurately collect data for use in BLS surveys?

Scope

We reviewed a statistical sample of training files in DIPS, DNCS, and DCPS for BLS entry-level data collectors for FYs 2007 through the first two quarters of 2011, and advanced data collectors for FYs 2010 through the first two quarters of 2011. We did not include DCSP in our audit sampling because the division is involved with cooperative agreements with the States, which is outside our audit scope.

We conducted fieldwork at the BLS national office in Washington, D.C., and BLS regional offices in San Francisco, Philadelphia, Atlanta and Chicago.

We conducted this audit in accordance with GAGAS for performance audits. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Methodology

We interviewed BLS-OFO national and regional officials for DIPS, DNCS and DCPS to gain an understanding of their survey data collector training requirements and the monitoring controls they used. We reviewed records for entry-level classroom, and refresher training maintained in the BLS national office to confirm data collectors' successful training completion. We also reviewed OJT records for entry-level survey collectors maintained by OFO regional offices to confirm successful training completion and certification.

OFO provided us with a list of data collectors from DIPS, DNCS, and DCPS for FYs 2007 through the first two quarters of 2011. We performed a data reliability assessment to ensure we had complete and accurate data. To determine whether the data was reliable to select our sample, we compared the universe of data collectors provided by OFO to the universe provided by BLS's personnel office. We also reviewed the computer program used to extract the list of data collectors that we used to select our sample to ensure its accuracy. We concluded the data to be sufficiently reliable for our audit purposes.

Based on a listing provided by the BLS Office of Administration, the audit universe consisted of 2,616 DCPS data collectors, 468 DIPS data collectors and 1,150 DNCS

data collectors. Based on OFO data collector training guidance and discussions with OFO, we classified data collectors as either entry-level or advanced (see Table 1).

	DCPS	DIPS	DNCS	Total
Entry -Level	330	35	19	384
Advanced	2286	433	1131	3850
Total	2616	468	1150	4234

From this universe, we reviewed a statistical sample of entry-level and advanced data collectors from each of the three divisions (see Table 2 and Table 3).

BLS Region	DCPS	DIPS	DNCS	Total
Boston	9	3	6	18
Philadelphia	13	1	1	15
Atlanta	12	0	5	17
Chicago	16	13	1	30
Dallas	19	1	1	21
San Francisco	24	5	2	31
Headquarters	3	6	2	11
Total	96	29	18	143

BLS Region	DCPS	DIPS	DNCS	Total
Boston	9	9	7	25
Philadelphia	9	6	12	27
Atlanta	2	8	6	16
Chicago	12	6	5	23
Dallas	8	2	14	24
San Francisco	19	9	11	39
Headquarters	1	2	5	8
Total	60	42	60	162

Training records for entry-level classroom training and refresher training was maintained at the BLS national office. We reviewed all 143 entry-level data collectors classroom training records from the six BLS regions and the national office. In addition, we reviewed all 162 refresher data collector records from the six BLS regions and the national office. For OJT training for entry-level data collectors, we reviewed 15 records in the BLS Philadelphia regional office, 31 records in the BLS San Francisco regional office, 30 records in the BLS Chicago regional office and 17 records in the BLS Atlanta regional office. Based on the number of exceptions we identified at the first four regional offices we visited, we did not perform testing at the remaining two BLS regional offices.

While we reviewed a statistical sample of entry-level and advanced data collectors from each of the three divisions at the four regional offices, we did not go to the last two regions. Therefore we did not project the results.

We evaluated internal controls used by BLS to obtain reasonable assurance that OFO provide required training to data collectors to ensure they were prepared to accurately collect data for use in BLS surveys. Our consideration of internal controls related to the training provided would not necessarily disclose all matters that might be reportable conditions. Because of inherent limitations in internal controls, noncompliance may nevertheless occur and not be detected.

Criteria

- BLS's OFO Training Curriculums
- BLS – CPI Data Collection Quality Control Manual
- BLS – IPP Quality Assurance Manual
- BLS – PPI Quality Assurance Manual
- BLS – NCS OJT Guide
- BLS – NCS Skill Development Guide
- Government Accountability Office – Standards of Internal Control in the Federal Government

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Appendix C

Acronyms and Abbreviations

BLS	Bureau of Labor Statistics
CPI	Consumer Price Index
DCQP	Data Collection Quality Program
DCPS	Division of Consumer Price Surveys
DCSP	Division of Cooperative Survey Programs
DIPS	Division of Industrial Price Surveys
DNCS	Division of National Compensation Surveys
DOL	Department of Labor
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
IPP	International Price Program
OFO	Office of Field Operations
OIG	Office of Inspector General
OJT	On-the-Job Training
PPI	Producer Price Index

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Appendix D

BLS Response to Draft Report

U.S. Department of Labor

Bureau of Labor Statistics
2 Massachusetts Ave. N.E.
Washington, D.C. 20212

MAR 28 2012

MEMORANDUM FOR: ELLIOTT P. LEWIS
Assistant Inspector General for Audit
Office of Inspector General

FROM : JOHN M. GALVIN *John M. Galvin*
Acting Commissioner
DANIEL J. LACEY *Daniel J. Lacey*
Associate Commissioner
for Administration

SUBJECT : BLS Response to the Office of Inspector General BLS Controls over
Training Data Collection Workers Needs Strengthening Report
Number 17-12-004-07-711

Thank you for providing the Bureau of Labor Statistics (BLS) with the Office of Inspector General (OIG) Draft Report, "BLS Controls over Training Collection Workers Needs Strengthening." We appreciate the opportunity to provide comments.

As the principal fact-finding agency for the Federal Government in the broad field of labor economics and statistics, the BLS is committed to the integrity and objectivity of our data. The BLS produces impartial, timely, and accurate data relevant to the needs of our users on the social and economic conditions of our Nation, its workers, and their families. The BLS strives to operate effectively and to comply with all Federal regulations and standards.

The Office of Field Operations (OFO) is the primary data collection arm of the Bureau of Labor Statistics, and is committed to the collection of high quality and accurate data for all survey areas. OFO offers rigorous training for employees who collect data for the Bureau's surveys, including the Industrial Price Surveys, Consumer Price Surveys, and National Compensation Surveys which were the focus of the OIG audit.

As noted in the "BLS Office of Field Operations Training Curriculums," dated 5/02/2011 that was provided to the OIG, training for data collection staff must be successfully completed before trainees begin independent data collection. On-the-job training, certification, and structured mentor training regimens are conducted in the regions and are designed to complement formal training provided by the National Office. As programs change data collection requirements, specific procedural, industry and/or refresher training is delivered to maintain staff technical knowledge and skills. As a companion to the OFO training regiment, OFO maintains a rigorous quality assurance program on certified staff to ensure the quality and integrity of collected data.

*The report number cited in the draft report— to which BLS referenced in its response — is incorrect. The correct report number is 17-12-004-11-001.

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In addition, OFO provides substantial ongoing technical guidance and oversight to the data collection staff, which was described in the document “BLS Office of Field Operations Technical Assistance” dated 5/10/2011.

In general, BLS agrees with the draft report recommendations, and is committed to implementing them. However, BLS disagrees with portions of the findings in the report regarding records of training completion. The following are BLS comments on the OIG’s findings and recommendations:

Finding 1:

BLS disagrees with the OIG’s findings on refresher training. The OIG’s stated finding was that “OFO could not demonstrate that advanced data collectors attended and completed refresher training.” OFO provided records including: electronic listings of staff who had completed the training and/or electronic records based on supervisory confirmation, from an in-house learning management system. All of these records are official documents and demonstrate both attendance and completion of training. The documentation provided was not sufficient for OIG Auditors who requested signed attendance sheets in paper format or printed certificates. BLS is not aware of any requirements to maintain signed paper documents to demonstrate training attendance. BLS contends that the electronic records provided demonstrate reasonable internal controls and constitute official records. Documentation was in fact provided for refresher and advanced staff training.

Regarding DIPS, based on a review of footnote 3 on page 3 in the draft OIG audit report, the OIG reviewed records for both refresher training and advanced training and used both as the basis for their finding. To clarify, Industrial Prices Refresher Training is not provided annually and advanced training (such as Mentor Training or Industry specific training) is scheduled based on the employee’s specific assignments.

The OIG requested advanced and refresher training records for 21 DIPS employees for fiscal year 2010 and 21 DIPS employees for fiscal year 2011. For 2010, all 21 sampled employees attended the Industrial Price Refresher Training and OFO provided records for all 21 employees.

For 2011, no all-employee refresher training was held; however, two advanced trainings were held and a special refresher training was offered for Branch Chiefs only. These trainings are offered based on employees’ specific assignments. Due to the nature of their collection assignments, 11 of the 21 sampled employees were not required to attend training. However, the OIG included these employees in their report. This is factually incorrect and misrepresents the number of employees who were provided training. Therefore, the number of files reviewed for DIPS should be reduced by 11, from 42 to 31 (21 FY 2010 Refresher Training Files and 10 FY 2011 Advanced Training/Branch Chief Refresher Training Files).

An example of the records provided by OFO DIPS to the OIG auditors was an electronic listing of attendees for the Industrial Prices Refresher training held in 2010. This listing was not a list of scheduled attendees, but a list of staff who actually attended the refresher training. This was explained to the OIG on August 25, was re-stated in our response to the OIG’s “Statement of Facts – Bureau of Labor Statistics (BLS) Technical Training Audit” on Dec. 12, and was

MAR 28 2012

reiterated in our meeting with the OIG on March 19, 2012. It should be noted that the record that OFO DIPS maintains (and was provided to the OIG) is dated 10/8/10 and was prepared and posted on the OFO DIPS intranet after the September 14-16, 2010 refresher. It is the BLS position that this constitutes an official record. Similar records were provided for the training offered in 2011 including the Branch Chief Refresher Training, Mentor Training, and the Management Consultants Training Conference Call.

For DNCS, Refresher training was offered in the regions by classroom in 2010 and by webinar in FY 2011. For the 30 records in FY2010, regional office supervisors attended the in-person classroom training, developed the participant list and were responsible for ensuring employee attendance. For the 30 records in FY 2011, OFO NCS provided the OIG with electronic records of the employees who attended the webinar. The BLS position is that this constitutes an official record. These were based on the NCS learning management system as well as supervisory confirmation that the employees attended the webinar. Participant signatures on paper are not possible in the electronic classroom.

Moreover, Finding 1 mistakenly gives the impression that the training participants may not have actually attended the training, when that is not the case. The report goes on to say that “Without maintaining documentation of the successful completion of refresher training, OFO cannot be fully assured that data collectors are adequately trained on changes to complex collection procedures and updates to best practices and collection aids.” OFO submitted reasonable documentation of training completion for data collection staff. BLS believes that the OIG statement greatly overstates the impact of not maintaining documentation in the manner deemed appropriate by the OIG.

Finding 2:

BLS also disagrees with the OIG’s finding on on-the-job training (OJT). The OIG’s finding stated, “OFO could not demonstrate the successful completion of OJT training.” It is BLS’ position that OFO demonstrated successful completion of OJT training for DIPS and DNCS by providing the requested OJT and certification records. OFO agrees that we must improve the monitoring of regional offices in DCPS to ensure the maintenance of OJT training records. However, the absence of an OJT training record simply implies that the administrative task of documenting the OJT activity was not fully executed.

In DCPS, to achieve Final Certification, an employee must successfully complete OJT. The files reviewed by the OIG demonstrated that Final Certification was achieved, which is evidence that OJT training was completed. As described in the “BLS Office of Field Operations Training Curriculum” document dated 5/02/2011, the certification process used by DCPS is designed so that the ongoing development of data collection skills is supervised over time and certain steps must be sequentially completed before a data collector’s Final Certification is achieved. After classroom or distance learning training, the data collector receives OJT. Upon successful completion of OJT, the data collector completes Interim Certification and then Final Certification.

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The report states that OIG “identified exceptions for 41 of 65 files reviewed (63 percent) in DCPS.” There were six components reviewed for each file: 1) OJT Checklist, 2) OJT Checklist signature, 3) Interim Certification, 4) Interim Certification signature, 5) Final Certification, and 6) Final Certification signature. A total of 390 instances of documentation for interim training activities prior to and including final certification were reviewed and exceptions were identified in 55 of 390 instances reviewed (14 percent). Thus, the OIG finding of 63% of the DCPS files with exceptions greatly overstates the actual incidence rate of 14% for the training records with exceptions.

BLS Response to OIG Recommendations:

BLS acknowledges and supports the recommendations in this report which are listed below:

1. Ensure that OFO implements a common learning management system, which will promote improved record keeping for training.
2. Ensure that OFO improves the monitoring of regional offices to enforce the maintenance of OJT training records to fully support that they have provided required training to entry-level data collectors.

OFO is currently researching a common learning management system which should facilitate improved record keeping for its training programs. OFO will continue its practice of monitoring the training and certification provided to entry-level data collectors, but will focus on improved record keeping for the areas noted in the OIG report.

Conclusion:

While BLS supports the recommendations in the report, we disagree with portions of the individual findings. Regarding Finding 1, OFO did provide documentation of the DIPS and DNCS staff who actually attended refresher or advanced training. Finding 1 mistakenly gives the impression that the training participants may not have actually attended the training, when that is not the case. The report goes on to say that “Without maintaining documentation of the successful completion of refresher training, OFO cannot be fully assured that data collectors are adequately trained on changes to complex collection procedures and updates to best practices and collection aids.” This statement greatly overstates the impact of not maintaining documentation in the manner deemed appropriate by the OIG. Regarding Finding 2, the OIG finding of 63% of the DCPS files with exceptions greatly overstates the actual incidence rate of 14% for the training records with exceptions.

We would like to thank you and the audit team for its work and commitment to helping to further us in our mission.

Appendix E

Acknowledgements

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