

BLS Response to Draft Report

U.S. Department of Labor

Bureau of Labor Statistics
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MAR 28 2012

MEMORANDUM FOR: ELLIOTT P. LEWIS
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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

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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.