Final Audit Report

AUDIT OF THE U.S. OFFICE OF PERSONNEL MANAGEMENT’S HUMAN RESOURCES STAFFING AND CLASSIFICATION PROCESS

Report Number 4A-ES-00-18-049
October 2, 2019
EXECUTIVE SUMMARY

Audit of the U.S. Office of Personnel Management’s Human Resources Staffing and Classification Process

Report No. 4A-ES-00-18-049 October 2, 2019

Why Did We Conduct The Audit?

The objectives of our audit were to determine if the U.S. Office of Personnel Management’s (OPM) Human Resources Staffing and Classification office is (1) following documented hiring processes, (2) meeting OPM’s End-to-End Hiring Initiative timeliness best practices, (3) processing personnel actions in compliance with The Guide to Processing Personnel Actions, and (4) ensuring Human Resources Staffing and Classification employees’ are properly trained to perform their duties.

What Did We Audit?

The Office of the Inspector General completed a performance audit of OPM’s Human Resources Staffing and Classification processes. Our audit was conducted from November 20, 2018, through March 26, 2019, at OPM headquarters located in Washington D.C.

What Did We Find?

We determined that OPM’s Human Resources Staffing and Classification office correctly processed personnel actions in compliance with The Guide to Processing Personnel Actions. However, we identified two areas where OPM should strengthen controls over its hiring processes and training for Human Resources Staffing and Classification employees. Specifically:

A. The Human Resources Staffing and Classification office lacks proper documentation to verify that all 18 of its Human Resources Specialists received the appropriate training to perform their job functions.

B. We analyzed 42 new hire recruitment actions, occurring from October 1, 2017, through September 30, 2018, and determined that 26 new hire recruitment actions were not properly documented during the hiring process and 22 were not completed within the 80 day model, also known as OPM’s End-to-End Hiring Initiative *.

* The results for each condition are independent of each other.

Michael R. Esser
Assistant Inspector General for Audits
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>HR</td>
<td>Human Resources</td>
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<td>OIG</td>
<td>Office of the Inspector General</td>
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<tr>
<td>OPM</td>
<td>U.S. Office of Personnel Management</td>
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This final audit report details the findings, conclusions, and recommendations resulting from our performance audit of the U.S. Office of Personnel Management’s (OPM) Human Resources (HR) Staffing and Classification’s hiring processes, personnel actions, and training. The audit was performed by OPM’s Office of the Inspector General (OIG), as authorized by the Inspector General Act of 1978, as amended. This is the first audit of OPM’s Human Resources Staffing and Classification Process by the OIG.

During fiscal year 2018, OPM’s Human Resources office, which was previously part of OPM’s Employee Services office, was reorganized and became a stand-alone office reporting directly to OPM’s Chief Management Officer. HR is comprised of four offices: (1) Chief Human Capital Office, (2) Staffing and Classification, (3) Employee/Labor Relations and Benefits, and (4) Program Development/HR Systems.

HR Staffing and Classification’s primary mission is to address all related human resources requirements for OPM personnel, both Federal employees and contractors, including classification and consulting services, and develop solutions to complex classification problems. Specific goals include:

- providing timely processing of new Federal employees through all human resources related areas;
- classifying proper position descriptions;
- creating appropriate job announcements;
- conducting job analysis;
- determining pay settings and leave; and
- validating applicant selections.

The Director of Human Resources leads the HR Staffing and Classification office and oversees the Group Manager. The Group Manager is responsible for supervising all of Staffing and Classification’s Federal employees, which are divided into three teams located in Washington, D.C. and Boyers, Pennsylvania.
Staffing and Classification’s responsibilities include:

**Lead Human Resources Specialist:**

- coaching the team in the selection and application of appropriate problem solving methods and techniques, and
- monitoring and reporting on the status of work and assessing and reviewing completed work to ensure that the supervisor's instructions are completed timely.

The Lead Human Resources Specialist also oversees the hiring process including staffing, classification, organization, and servicing for various OPM program offices including:

- preparing the job detail, including the categorization of an employee by career or career-conditional appointment, competitive, Senior Executive Service, etc.,
- overseeing the position description and job analysis and certification of the applicants,
- classifying job announcements,
- reviewing pay settings, such as the General Schedule, for Federal employees, and
- approving leave, and managing and distributing workloads to Staffing and Classification employees.

**Human Resources Specialist (Classification):**

- developing solutions to complex classification problems in the areas of position reviews and evaluation,
- conducting desk audits and/or position reviews,
- providing guidance pertaining to the Fair Labor Standards Act and writing evaluations for classification,
- advising on pay setting practices and procedures, and
- drafting and posting Job Opportunity Announcements.
Human Resources Specialist (Recruitment and Placement/Classification):

- performing the same duties as the Human Resources Specialist (Classification),
- serving as a recognized senior advisor and rendering policy interpretations on highly complex agency-wide or equivalent issues,
- providing expert HR consulting and advice to their assigned organization(s), and
- developing solutions to complex problems that arise in areas such as staffing, recruitment/placement, classification, position management, and compensation.

Human Resources Assistant:

- assisting the Human Resources Specialist by gathering information used in performing job analyses to identify Knowledge, Skills, and Abilities,
- assisting in developing standard job announcements and supplemental qualification documents, and
- reviewing applications for minimum qualification requirements, determining veteran's preference, and assisting supervisors and applicants by answering questions about the hiring process.

HUMAN RESOURCES GUIDANCE

Staffing and Classification’s workload responsibilities involve internal processes guided by various laws and regulations, including the following:

- Code of Federal Regulations Title 5, Administrative Personnel (Dated September 6, 1966) - Covers OPM civil service rules for appointment through competitive system, prohibited practices; exceptions for the competitive service; and work information.
- 81 Federal Register 86555, Recruitment, Selection and Placement, (General) and Suitability, (Dated December 1, 2016) - Pertains to when, during the hiring process, a
hiring agency can request information typically collected during a background investigation from an applicant for Federal employment.

- 81 Federal Register 83107, *Veteran’s Preference*, (Dated November 21, 2016) – Implements statutory changes to veteran’s preference in response to the Hubbard Act, which broadened the category of individuals eligible for veterans' preference, and to implement the Veterans Opportunity to Work to Hire Heroes Act of 2011. This requires Federal agencies to treat certain active duty service members as preference eligible for purposes of an appointment to the competitive service, even though the service members have not been discharged or released from active duty and do not have a Department of Defense Form 214, *Certificate of Release or Discharge from Active Duty*.

- 81 Federal Register 78497, *Career and Career-Conditional Employment* (Dated November 8, 2016) – “States that an individual may attain career tenure after completing at least three years of total creditable service. Each period of creditable service would stand-alone. Once the employee accumulates three years of creditable service, he/she is converted to career tenure”.

### HIRING AND PERSONNEL ACTION PROCESSES

**OPM’s End-to-End Hiring Initiative**

Staffing and Classification’s hiring process consists of an 80-day hiring timeline that is based on a Government-wide initiative process model for conducting efficient, high quality hiring, created as a partnership between OPM and the Chief Human Capital Officers Council Subcommittee for Hiring and Succession Planning. The timeline helps hiring managers identify processes and diagnose areas of the greatest need for improvement. Staffing and Classification uses the hiring timeline¹ and case file checklists² to show that the hiring process was followed.

For each job announcement, except OPM and Merit Promotion positions, human resources specialists calculate the open period based on calendar days. OPM and Merit Promotion job announcement open periods are calculated using business days.

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¹ Staffing and Classification employees use the hiring timeline as a guideline to complete *OPM’s End-to-End Initiative* hiring process for applicants.

² Staffing and Classification employees use the case file checklist to ensure that all information in the case file is completed and documented for electronic filing.
OPM has a 14-step process to complete the hiring timeline, as shown in the table below.

<table>
<thead>
<tr>
<th>STEP</th>
<th>DESCRIPTION</th>
<th>TOTAL NUMBER OF DAYS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 1</td>
<td>Validate the Need Against the Workforce, Staffing and Recruiting Plans</td>
<td>1</td>
</tr>
<tr>
<td>Step 2</td>
<td>Request for Personnel Action to Fill the Job</td>
<td>1</td>
</tr>
<tr>
<td>Step 3</td>
<td>Review the Position Description</td>
<td>1</td>
</tr>
<tr>
<td>Step 4</td>
<td>Confirm the Job Analysis and Assessment Strategy</td>
<td>5</td>
</tr>
<tr>
<td>Step 5</td>
<td>Create and Post a Job Opportunity Announcement including Identifying Career Patterns</td>
<td>2</td>
</tr>
<tr>
<td>Step 6</td>
<td>Receive Applications and Notify Applicants</td>
<td>10</td>
</tr>
<tr>
<td>Step 7</td>
<td>Close Job Opportunity Announcement</td>
<td>1</td>
</tr>
<tr>
<td>Step 8</td>
<td>Evaluate Applications</td>
<td>15</td>
</tr>
<tr>
<td>Step 9</td>
<td>Issue Certificate and Notify Applicant of Eligibility</td>
<td>1</td>
</tr>
<tr>
<td>Step 10</td>
<td>Review Applications, Schedule and Conduct Interviews, Check References, Make Selection and Return Certificate</td>
<td>15</td>
</tr>
<tr>
<td>Step 11</td>
<td>Tentative Job Offer and Acceptance</td>
<td>3</td>
</tr>
<tr>
<td>Step 12</td>
<td>Initiate Investigation at the Appropriate Level for the Position to be Filled</td>
<td>10</td>
</tr>
<tr>
<td>Step 13</td>
<td>Official Offer and Acceptance</td>
<td>2</td>
</tr>
<tr>
<td>Step 14</td>
<td>Enter on Duty</td>
<td>14</td>
</tr>
</tbody>
</table>

**GRAND TOTAL** 80

*Personnel Action Process*

There are 88 personnel action categories performed by OPM’s HR for OPM employees. Personnel actions may occur when it is necessary to appoint, separate, or make other personnel changes to an employee’s status. The personnel action process must be performed through a *Request for Personnel Action, Standard Form 52*, or similar agency form approved by OPM. These actions are performed by HR and receive approval from the hiring manager/supervisor by the specified effective date listed on the *Standard Form 52*. *The Guide to Personnel Action Handbook*[^1] contains information for processing personnel actions.

[^1]: The grand total of the steps in OPM’s End-to-End Hiring Initiative, as stated on OPM’s website, equals 81 days, not 80 days. However, step 7, “Close Job Opportunity Announcement”, is really closer to zero days, and therefore the total would be 80 days.

According to Staffing and Classification, employees are required to take the following training:

- **Basic Staffing** - five-day course with the Graduate School USA.
- **Basic Position Classification** - 10-day course with the Graduate School USA.
- **Delegated Examining** - three-day course with OPM.

Each course must be taken prior to working on HR actions and no refresher training is provided. Staffing and Classification also provides on-the-job training for all of its employees.
II. OBJECTIVES, SCOPE AND METHODOLOGY

OBJECTIVES

The objectives of our audit were to determine if Staffing and Classification completed new hire recruitment actions and processed personnel actions correctly for OPM employees. Specifically, we determined if Staffing and Classification:

- followed their documented hiring process;
- met hiring timeliness in accordance with *OPM’s End-to-End Hiring Initiative* (80-day model) best practices;
- completed personnel actions in compliance with *The Guide to Processing Personnel Actions*; and
- ensured that staff were properly trained to perform their duties.

The recommendations included in this final report address these objectives.

SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards as established by the Comptroller General of the United States. These 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 objectives.

The scope of our audit covered Staffing and Classification’s policies and procedures, training, and recruitment and personnel actions from October 1, 2017, through September 30, 2018. Our audit universe consisted of:

<table>
<thead>
<tr>
<th>Audit Area</th>
<th>Total Universe</th>
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<tbody>
<tr>
<td>New Hire Recruitment Actions</td>
<td>856 Actions</td>
</tr>
<tr>
<td>OPM Personnel Actions</td>
<td>20,556 Actions</td>
</tr>
<tr>
<td>Training</td>
<td>18 Staffing and Classification Staff</td>
</tr>
</tbody>
</table>
We performed our audit, from November 20, 2018, through March 26, 2019, at OPM’s headquarters located in Washington, D.C.

To accomplish our audit objectives noted above, we:

- interviewed the Staffing and Classification manager;

- sampled and tested recruitment actions for OPM’s End-to-End Hiring Initiative (80-day model);

- sampled and tested personnel actions to determine whether they were in compliance with The Guide to Processing Personnel Actions; and

- tested training records to determine whether staff were properly trained.

In planning our work and gaining an understanding of the internal controls over the hiring process, personnel actions, and training, we considered, but did not rely on, Staffing and Classification’s internal control structure to the extent necessary to develop our audit procedures. These procedures were mainly substantive in nature. We gained an understanding of management procedures and controls to the extent necessary to achieve our audit objectives. The purpose of our audit was not to provide an opinion on internal controls but merely to evaluate controls over the processes included in the scope of our audit.

Our audit included such tests and analysis of the universe of Staffing and Classification’s personnel actions and new recruitment actions received and reviewed for the hiring process, including timeliness standards for the OPM End-to-End Hiring Initiative (80-day model); training for staff; and other procedures, as we considered necessary under the circumstances. The results of our tests indicate that with respect to the items tested, Staffing and Classification correctly processed personnel actions for OPM employees and contractors. However, OPM should strengthen controls over its hiring processes and training of Staffing and Classification employees.

In conducting the audit, we relied to varying degrees on computer-generated data. Due to the nature of the audit, we did not verify the reliability of the data generated by the systems involved. However, while utilizing the computer-generated data during our audit, nothing came to our attention to cause us to doubt its reliability. We believe that the data was sufficient to achieve our audit objectives. We did not evaluate the effectiveness of the general application controls over computer-processed performance data.
We used IDEA, a data analytics software tool, to randomly select 42 out of 856 new hire recruitment actions to test the timeliness and accuracy of the hiring process, and 93 out of 20,556 personnel actions to test OPM’s compliance with *The Guide to Processing Personnel Actions*. In addition, we selected all 18 employees from Staffing and Classification to test if all staff were properly trained. The samples covered the period from October 1, 2017, through September 30, 2018.

The samples selected during our review were not statistically based. Consequently, the results from our samples were not projected to the populations.
III. AUDIT FINDINGS AND RECOMMENDATIONS

The sections below detail the results of our audit of OPM’s Human Resources Staffing and Classification Processes. We determined that OPM’s Human Resources Staffing and Classification office correctly processed personnel actions in compliance with *The Guide to Processing Personnel Actions*. However, we identified two areas detailed below, in which OPM should strengthen controls over its hiring processes and training for Human Resources Staffing and Classification employee.

A. **Training**

We selected all 18 of Staffing and Classification’s employees to determine if training requirements were met. We were unable to verify that all 18 employees completed the required *Basic Staffing and Basic Position Classification* training courses. Details of our review were provided to Staffing and Classification separate from this report.

Staffing and Classification employees’ training files lack the proper documentation, such as training certificates or other supporting documentation, to verify that its employees completed the appropriate training to perform their job functions.

On April 28, 2006, OPM issued the results of a Human Resources Management Expert Survey confirming competency levels adopted by the Chief Human Capital Officer’s Council for Government-wide series 0201, Human Resources Specialist, grade 12 and above positions, including Classification, Compensation, Employee Benefits, Employee Relations, HR Information Systems, Performance Management, and Recruitment/Placement. The adopted HR Specialist competency levels are covered in the *Basic Staffing* and *Basic Position Classification* courses required for Staffing and Classification employees.

The U.S. Government Accountability Office’s *Standards for Internal Control in the Federal Government, Principle 4*, states that “Management [should] establish expectations of competence for key roles, and other roles at management’s discretion, to help the entity achieve its objectives. Competence is the qualification to carry out assigned responsibilities. It requires relevant knowledge, skills, and abilities, which are gained largely from professional experience, training, and certifications.”

In addition, *principle 10 - Design Control Activities*, advises that “Management designs control activities in response to the entity’s objectives and risks to achieve an effective internal control system. Control activities are the policies, procedures, techniques, and mechanisms that enforce management’s directives to achieve the entity’s objectives and address related risks ...[and]
clearly documents internal control … in a manner that allows the documentation to be readily available for examination. The documentation may appear in management directives, administrative policies, or operating manuals, in either paper or electronic form. Documentation and records are properly managed and maintained.”

Failing to ensure that all Staffing and Classification employees’ required training is completed and documented can result in inaccuracies with providing staffing, recruitment/placement, position management, compensation and benefits for OPM employees and contractors.

**Recommendation 1**

We recommend that Staffing and Classification implement internal controls to ensure that all employees take the required training to perform their job functions and that supporting documentation for completed training is maintained.

**Staffing and Classification’s Response**

*Staffing and Classification does not concur with the recommendation and states that they “do not agree that the other training courses [Basic Staffing and Basic Position Classification] listed are required as [a] classroom course with certificates, as they can be learned on the job, normally at the entry level GS-7 or GS-9 level. Performance is monitored and work is reviewed to ensure the appropriate procedures and methods used, are followed and employees are technically sound at the appropriate grade level. Moving forward, OPM HR … will ensure to maintain historical records.” Additionally, Staffing and Classification states “OPM HR’s Staffing & Classification Group does not hire at entry/trainee levels (GS-5/7/9) and HR Specialists[s] that have been hired already have the required competencies to perform basic staffing and classification duties.”*

*Staffing and Classification also states, “we have only recruited at the GS-12 and GS-13 level. We review the resumes to determine if they meet the minimum qualifications for the position which would include the competencies required that would cover the knowledge of the courses listed, i.e., Basic Staffing and Basic Position Classification. This would be identified in their resumes as experience developing job analysis, creating/identifying assessment tools, conducting/leading strategic recruitment discussions, developing job opportunity announcements, providing guidance and advice to managers on drafting positions descriptions and assisting with position management within the organization, analyzing draft position descriptions, identifying appropriate factor levels to determine grades for positions and developing position evaluation statements that document the determinations requirements.”*
**OIG Comment:**

During the planning of this audit, Staffing and Classification’s Group Manager provided a list of required training for HR Specialists, which included Basic Staffing and Basic Position Classification training courses; therefore, we used that information as criteria to test whether the specialists had been properly trained. However, Staffing and Classification’s response to our draft report states that the office reviews résumés to determine if the HR Specialists meet the requirements for the position. We have not received evidence to support Staffing and Classification’s reviews and conclusions that applicants have received the required training.

**B. New Hire Recruitment Actions**

We randomly sampled 42 out of 856 new hire recruitment actions that occurred from October 1, 2017, through September 30, 2018, to determine whether timeliness requirements were met and the hiring process was properly documented. We determined that 26 of these new hire recruitment actions were not properly documented, in accordance with OPM's End-to-End Initiative (80-day model), resulting in a total of 53 exceptions, as follows:

- An HR Specialist did not check the veteran 10-point requirement for one action.
- Thirty signatures were missing from the case file checklist and hiring timeline.
- Twenty-two new hire recruitment actions did not meet timeliness requirements, as outlined in OPM’s End-to-End Initiative (80-day model).

In addition, we determined that 22 of these new hire recruitment actions did not meet timeliness requirements, in accordance with OPM's End-to-End Initiative (80-day model), resulting in 36 exceptions*, as shown in the chart below.

![End-to-End Initiative (80-Day) Timeliness Exceptions](chart)

*The results for each condition are independent of each other. Steps listed in the chart are listed on page 5 and exceptions were not identified for all steps.*
Details of our review were provided to Staffing and Classification separately from this report.

The Government Accountability Office’s Standards for Internal Control in the Federal Government (SICFG), principle 12 – Implement Control Activities, states that “Management documents in policies the internal control responsibilities of the organization.” Also, it states that “Management documents in policies for each unit its responsibility for an operational process’s objectives and related risks, and control activity design, implementation, and operating effectiveness.” Additionally, “Management periodically reviews policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity’s objectives or addressing related risks. If there is a significant change in an entity’s process, management reviews this process in a timely manner after the change to determine that the control activities are designed and implemented appropriately. Changes may occur in personnel, operational processes, or information technology.”

Staffing and Classification stated that the hiring timeline and case file checklist are used for informational purposes and that a specialist did not check for the 10-point veteran’s preference for one of the job announcements. Inconsistencies in the hiring process prolong entry dates for new applicants.

**Recommendation 2**

We recommend that Staffing and Classification implement periodic reviews of new hire recruitment actions to ensure that staff are adhering to applicable policies and procedures, such as OPM’s End-to-End Initiative (80-day model).

**Staffing and Classification’s Response**

*Staffing and Classification concurs with the recommendation and stated “We review our time to hire every quarter, and while the 80-day model is an initiative, we do strive to achieve this, though our current policies do not allow for shortening some of the phases. We have made adjustments over the years to more accurately define our model, however, we strive to shorten our hiring and make adjustments where we can.” Additionally, Staffing and Classification, stated that they will over the next two years “continue to make adjustments to phases of the hiring process and try to get closer to meeting the 80-day model.”*
OIG Comment:

Staffing and Classification’s response stated that the office completes time-to-hire reviews every quarter; however, we were not informed about quarterly reviews or provided any evidence of such reviews during our audit.

Responses to your recommendations including planned corrective actions, as appropriate, are provided below.

**Recommendation #1:** We recommend that Staffing and Classification implement internal controls to ensure that all employees take the required training to perform their job functions and supporting documentation for completed training is maintained.

**Management Response:** We partially concur. We agree with the implementation of internal controls, however, we do not agree that the other training courses listed are required as classroom course with certificates, as they can be learned on the job, normally at the entry level GS-7 or GS-9 level. Performance is monitored and work is reviewed to ensure the appropriate procedures and methods used, are followed and
employees are technically sound at the appropriate grade level.

Moving forward, OPM HR is will ensure to maintain historical records.

**Recommendation #2:** We recommend that Staffing and Classification implement periodic review of new hire recruitment actions to ensure that staff are adhering to applicable policies and procedures, such as *OPM’s End-to-End Initiative (80 day) model.*

**Management Response: We concur.** We review our time to hire every quarter, and while the 80 day model is an initiative, we do strive to achieve this, though our current policies do not allow for shortening some of the phases. We have made adjustments over the years to more accurately define our model, however, we strive to shorten our hiring and make adjustments where we can.

I appreciate the opportunity to respond to this draft report. If you have any questions regarding our response, please contact Jessica Parton, (202) 606-8318, and Jessica.Parton@opm.gov.
For the training recommendation, OPM HR’s Staffing & Classification Group does not hire at entry/trainee levels (GS-5/7/9) and HR Specialist that have been hired already have the required competencies to perform basic staffing and classification duties. These competencies are evident in their past experience, as documented in their resumes and job performance.

For the 2nd recommendation, we use the 80-day hiring model as a guide, we do not have control over the entire process. Over the next 2 years, we will continue to make adjustments to phases of the hiring process, try to get closer to meeting the 80-day model.

Let me know if this works or you’d like to discuss further.

When recruiting for HR Specialists in S&C, we have only recruited at the GS-12 and GS-13 level. We review the resumes to determine if they meet the minimum qualifications for the position which would include the competencies required that would cover the knowledge of the courses listed, i.e., Basic Staffing and Basic Position Classification. This would be identified in their resumes as experience developing job analysis, creating/identifying assessment tools, conducting/leading strategic recruitment discussions, developing job opportunity announcements, providing guidance and advice to managers on drafting positions descriptions and assisting with position management within the organization, analyzing draft position descriptions, identifying appropriate factor levels to
determine grades for positions and developing position evaluation statements that document the determinations requirements.

Good Morning Jessica,

I received your response pertaining to the resume portion for verifying the HR specialist has completed training, however, how is it evaluated through their job performance?

The same way, we review work products and observe performance, as stated for the resume review.

We would review their work products, such as, job analysis, assessment tools, job opportunity announcements. Observe them conducting/leading strategic recruitment discussions & providing guidance and advice to managers on drafting positions descriptions and assisting with position management within the organization. Review work products such as classified position descriptions, verifying that factor levels were appropriate to determine appropriate grades for positions and developing position evaluation statements that document the determinations requirements.
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Washington, DC 20415-1100