UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 22, 2008

MEMORANDUM TO: R. William Borchardt
                    Executive Director for Operations

FROM: Stephen D. Dingbaum **/RA/**
                    Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: EVALUATION OF
                    NRC'S TRAINING AND DEVELOPMENT PROGRAM
                    (OIG-08-A-13)

REFERENCES: EXECUTIVE DIRECTOR FOR OPERATIONS
                    MEMORANDUM DATED SEPTEMBER 22, 2008

                    OFFICE OF HUMAN RESOURCES E-MAILS DATED
                    NOVEMBER 20 and 21, 2008

Attached is the Office of the Inspector General's (OIG) analysis and status of
recommendations as conveyed in the agency's response dated September 22, 2008,
and e-mail correspondence dated November 20 and 21, 2008. Based on this analysis,
recommendation 5 contained in the subject report is closed and the remaining 16
recommendations are resolved. Please provide an updated status on these
recommendations by March 31, 2009.

If you have any questions or concerns, please contact me at 415-5915 or Steven Zane,
Team Leader, at 415-5912.

Attachments: As stated

cc: V. Ordaz, OEDO
        J. Arildsen, OEDO
        P. Shea, OEDO

Audit Report

EVALUATION OF NRC'S TRAINING AND DEVELOPMENT PROGRAM

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Status of Recommendations

Recommendation 1:   Review the current course files to identify gaps in necessary documentation.

Agency Response Dated
September 22, 2008:   Agree. Human Resources Training and Development (HRTD) will review the current course files and identify gaps in necessary documentation. Completion date: March 31, 2009.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when HRTD provides OIG with documentation that verifies HRTD has completed its review of current course files to identify gaps in necessary documentation.

Status: Resolved.

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Status of Recommendations

<u>Recommendation 2</u>:	Develop a plan and timeline for completing any missing course documentation.
Agency Response Dated September 22, 2008:	Agree. HRTD will develop a plan and timeline for completing any missing course documentation. Completion date: June 30, 2009.
OIG Analysis:	The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when HRTD provides OIG with the documentation that verifies that HRTD has developed a plan and timeline for completing any missing course documentation.
Status:	Resolved.

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Status of Recommendations

Recommendation 3: Complete HRTD Operating Procedure 404 – Training Material Control to include a standard process for version control, tracking changes, and assigning accountability for changes.

Agency Response Dated September 22, 2008: Agree. HRTD will update HRTD Operating Procedure 404 to include a standard process for version control and tracking changes. Because the operating procedure already assigns accountability for changes to the course instructor, that item requires no further action. Completion date: December 31, 2009.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives a copy of the completed HRTD Operating Procedure 404 – Training Material Control that includes a standard process for version control and tracking changes.

Status: Resolved.

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Status of Recommendations

Recommendation 4:   Develop a plan to centralize course materials in one location, preferably a central repository on a shared server.

Agency Response Dated
September 22, 2008:   Agree. HRTD will examine its needs and develop a plan to centralize course materials. Whether the materials will be centralized in one location, in a shared repository or on a shared server is to be determined. Completion date: June 30, 2009.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when HRTD provides OIG with documentation that verifies that HRTD has developed a plan to centralize course materials in one location.

Status: Resolved.

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Status of Recommendations

Recommendation 5:	Develop a lifecycle maintenance procedure for periodically reviewing courses to ensure the learning objectives are still valid, the delivery mechanism is still the most effective, or the course is still meeting stakeholder needs.
Agency Response Dated September 22, 2008:	Agree. This item requires no further action. HRTD Operating Procedure 0406 "Training Program Development Process" describes the lifecycle maintenance process for HRTD courses using the systems approach to training methodology. Courses are reviewed as needed with the course sponsors to ensure the learning objectives are valid, the delivery mechanism is appropriate, and the course meets stakeholder needs.
OIG Analysis:	OIG reviewed the HRTD documentation that contains the recommended action. The documentation addresses the intent of this recommendation.
Status:	Closed.

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Status of Recommendations

Recommendation 6: Form a working group of select representatives from the program offices, regional offices, and HRTD to conduct a thorough review of the training calendar, including location and frequency of courses, travel costs, and opportunities for efficiencies in course sequencing (i.e., course bundling). The group should identify problems and develop mutually agreed-upon solutions within the constraints of contractual agreements, budgets, and resources.

Agency Response Dated
September 22, 2008: Agree. HRTD will engage the program offices and regions, through a working group or other appropriate method, to review and align on the training calendar. Completion date: December 31, 2008.

OIG Analysis: The proposed corrective action addresses the intent of the recommendation. OIG will close this recommendation when it receives evidence to verify the HRTD has formed a working group to review the training calendar, identify problems, and develop solutions.

Status: Resolved.

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<u>Recommendation 7</u>:	Within contractual limitations, identify and schedule courses at the same time each year so employees can anticipate the availability of courses. Communicate these courses and dates widely to make sure employees, supervisors, training coordinators, and managers are aware of the annual schedule.
Agency Response Dated September 22, 2008:	Agree. HRTD already does this for many courses. We will evaluate approaches for better disseminating the schedule to the staff. Completion date: June 30, 2009.
OIG Analysis:	The proposed action addresses the intent of this recommendation. This recommendation will be closed once OIG receives evidence that HRTD identifies and schedules courses at the same time each year and communicates this information to those individuals affected.
Status:	Resolved.

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<u>Recommendation 8</u>:	Before implementing the enforcement of course prerequisites in the Learning Management System:

    a.   Determine the impact on employees' ability to take all required training within the allotted timeframe.

    b.   Communicate the change to NRC personnel in advance and allow opportunities for feedback.

Agency Response Dated
September 22, 2008:   Agree. NRC uses the systems approach to training to determine course prerequisites based on the need to sequence training so that fundamental material precedes advanced learning and this is the overriding concern. We will consider impacts on employees whenever possible.

Agency Response Dated
November 20, 2008:   When HRTD determines that a prerequisite course is necessary to provide fundamental knowledge and skills that are needed to support learning activities for a subsequent course(s), the training coordinators for the affected offices will be notified and any impacts on staff qualification programs will be resolved as necessary with affected offices. The prerequisite information and controls will then be implemented in the iLearn learning management system. The iLearn catalog and registration information will be updated to inform students of any course prerequisites. This process will be documented in HRTD Operating Procedure 403, "Course Administration," by 6/30/2009. Additionally, HRTD will notify all office training coordinators of existing prerequisites currently in effect by 12/31/2008.

OIG Analysis: See OIG analysis on the following page.

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Recommendation 8, continued:

OIG Analysis: The proposed action addresses the intent of OIG's recommendation. This recommendation will be closed once OIG receives documentation that verifies that (1) HRTD Operating Procedure 403, "Course Administration," contains the process HRTD uses to determine the impact on employees' ability to take all required training within the allotted timeframe, and (2) HRTD has notified all office training coordinators of existing prerequisites and allowed NRC personnel opportunities for feedback.

Status: Resolved.

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Status of Recommendations

Recommendation 9:   Develop and implement new performance metrics to
                           demonstrate mission alignment, effectiveness, and
                           efficiency.

Agency Response Dated
September 22, 2008:   Agree. The staff will evaluate appropriate performance
                           metrics. Completion date: March 31, 2009.

OIG Analysis: The proposed corrective action addresses the intent of OIG's
                           recommendation. This recommendation will be closed when
                           HRTD develops and implements new performance metrics
                           to demonstrate mission alignment, effectiveness, and
                           efficiency and provides OIG with documentation that verifies
                           that this action has been taken.

Status: Resolved.

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Status of Recommendations

Recommendation 10:   Develop and implement a plan to leverage the capabilities of the LMS for collection and reporting of chosen metrics. Specifically, evaluate the competency model capabilities to determine if they meet NRC's needs, including identifying competencies, linking courses (or course modules and learning objectives) to identified competencies, and closing critical skill gaps.

Agency Response Dated
September 22, 2008:   Agree. HRTD will develop and implement a plan to evaluate the LMS's capabilities for collecting and reporting chosen metrics. Completion date: September 30, 2009.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when HRTD develops and implements a plan to leverage the capabilities of the LMS for collection and reporting of chosen metrics and provides OIG with the documentation that verifies that this action is complete.

Status: Resolved.

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Recommendation 11: Develop and implement a comprehensive cost tracking capability (including cost data for each course) to determine the most economical and efficient method to meet NRC's training needs.

Agency Responses Dated November 20 and 21, 2008: Agree. HRTD OP 406 will be reviewed and specific guidance for applying NRC cost-benefit principles in the consideration of options to procure or internally develop and deliver courses will be added by September 9, 2009.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. OIG will close this recommendation when HRTD provides documentation that verifies that the HRTD OP 406 has been revised to include specific guidance for applying NRC cost-benefit principles for determining the most economical and efficient method to meet NRC's training needs.

Status: Resolved.

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<u>Recommendation 12</u>:	Finalize Operating Procedure 410 including a new standardized student feedback form.
Agency Response Dated September 22, 2008:	Agree. HRTD will approve Operating Procedure 410 to include a student feedback form or family of forms that best meet the agency's needs. Completion date: December 20, 2008.
OIG Analysis:	The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives a copy of finalized Operating Procedure 410 including a new standardized student feedback form.
Status:	Resolved.

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Recommendation 13:   Develop an evaluation strategy plan that defines the data
                      HRTD needs to collect at varying levels to demonstrate the
                      impact of its programs on the agency.

Agency Response Dated
September 22, 2008:   Agree. HRTD will engage its stakeholders to develop an
                      evaluation strategy plan. Completion date: March 31, 2010.

OIG Analysis: The proposed corrective action addresses the intent of OIG's
                      recommendation. This recommendation will be closed when
                      HRTD develops an evaluation strategy plan (and provides
                      the appropriate documentation to OIG) that defines the data
                      HRTD needs to collect at varying levels to demonstrate the
                      impact of its programs on the agency.

Status: Resolved.

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Status of Recommendations

Recommendation 14:   Evaluate the capability for collecting evaluation data via the Learning Management System.

    a. If the Learning Management System's capabilities meet the agency's needs, develop a business case for purchase and deployment of additional capabilities.

    b. If the Learning Management System's capabilities do not meet the agency's needs, develop a plan for using alternative technologies to collect and analyze evaluation data.

Agency Response Dated
September 22, 2008:   Agree. The staff will evaluate the capability for collecting evaluation data via the Learning Management System and determine the appropriate path forward at that point. Completion date: March 31, 2010.

OIG Analysis: The proposed action addresses the intent of the recommendation. This recommendation will be closed once HRTD provides the results of its evaluation and documentation of either the business case for purchase and deployment of additional capabilities or a plan for using alternative technologies to collect and analyze evaluation data.

Status: Resolved.

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Status of Recommendations

Recommendation 15:   Develop an e-learning strategy that establishes a broad, fundamental connection between e-learning and organizational mission, strategy, business objectives, and performance improvement.

Agency Response Dated
September 22, 2008:   Agree. NRC's e-learning strategy is included in the Training and Development Strategic Plan (TDSP). This recommendation will be incorporated in the current review and update of the TDSP. Completion date: March 31, 2009.

OIG Analysis: The proposed action addresses the intent of the recommendation. OIG will close this recommendation once HRTD provides documentation to verify that the updated TDSP includes an e-learning strategy that establishes a connection between e-learning and organizational mission, strategy, business objectives, and performance improvement.

Status: Resolved.

Recommendation 16:   Develop an implementation plan for e-learning that includes, at a minimum:

           a. An assessment of NRC's baseline technology.

           b. A plan for roll-out, implementation, maintenance and ongoing evaluation of additional Learning Management Systems capabilities. The implementation plan should include a cost/benefit analysis of the available LMS features and how they can support NRC's business needs.

Agency Response Dated
September 22, 2008:   Agree. NRC's TDSP and HRTD's e-learning plan contain NRC's e-learning strategy and implementation plan. HRTD will initiate a review of current training for applicability of alternative methods of course delivery. Completion date: March 31, 2010.

OIG Analysis: The proposed action addresses the intent of the recommendation. OIG will close this recommendation once HRTD provides documentation that its e-learning plan includes an implementation plan that includes an assessment of NRC's baseline technology; a plan for roll-out, implementation, maintenance, and ongoing evaluation of additional LMS capabilities; and a cost/benefit analysis of the available LMS features.

Status: Resolved.

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Recommendation 17:   Develop a process similar to the Strategic Workforce
                       Planning Process to:

        a. Determine the e-learning skill sets necessary to meet
          NRC's business needs;

        b. Assess the current staff to determine the availability of
          the needed skills; and

        c. Develop a plan to close any identified gaps—either
          through training, hiring, or outsourcing.

Agency Response Dated
September 22, 2008:   Agree. HRTD plans to update its e-learning plan to
                       introduce alternative instructional methods as needs and
                       resources allow. This update will include an assessment of
                       staff skills and resources needed to implement chosen
                       delivery formats. Completion date: March 31, 2010.

OIG Analysis: The proposed action addresses the intent of the
                       recommendation. OIG will close this recommendation once
                       it receives and verifies evidence that HRTD has updated its
                       e-learning plan to include a process that incorporates the
                       e-learning skill sets necessary to meet NRC's business
                       needs, the availability of the needed skills, and a plan to
                       close any identified gaps.

Status: Resolved.