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

OFFICE OF THE
INSPECTOR GENERAL

May 6, 2009

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: DEPUTY DIRECTOR, OFFICE OF HUMAN RESOURCES, MEMORANDUM DATED MARCH 25, 2009

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 analysis and status of recommendations 1-4 and 6-17 as discussed in the agency's response dated March 25, 2009. Based on this response, recommendations 1, 6, 12, and 15 are closed and recommendations 2-4, 7-11, 13, 14, 16, and 17 remain in resolved status. Recommendation 5 was previously closed. Please provide an updated status of the resolved recommendations by December 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**

**OIG-08-A-13**

**Status of Recommendations**

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| Recommendation 1: | Review the current course files to identify gaps in necessary documentation. |
| Agency Response Dated March 25, 2009: | The staff has completed this item. Human Resources Training and Development (HRTD) reviewed the current course files and identified gaps in necessary documentation. Enclosure 1 provides the course file review summary. Completion Date: March 16, 2009 |
| OIG Analysis: | OIG reviewed the documentation provided by the Office of Human Resources and verified that HRTD has completed its review of current course files to identify gaps in necessary documentation. This satisfies the recommendation. Therefore, this recommendation is closed. |
| **Status:** | Closed. |

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**Status of Recommendations**

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|---|---|
| Recommendation 2: | Develop a plan and timeline for completing any missing course documentation. |
| Agency Response Dated March 25, 2009: | There is no change in the status of this recommendation. Targeted Completion Date: June 30, 2009 |
| Agency Response Dated September 22, 2008: | Agree. HRTD will develop a plan and timeline for completing any missing course documentation. |
| OIG Analysis: | 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**

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|---|---|
| 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 March 25, 2009: | There is no change in the status of this recommendation. Targeted Completion Date: December 31, 2009 |
| 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. |
| OIG Analysis: | 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**

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|---|---|
| Recommendation 4: | Develop a plan to centralize course materials in one location, preferably a central repository on a shared server. |
| Agency Response Dated March 25, 2009: | There is no change in the status of this recommendation. Targeted Completion Date: June 30, 2009 |
| 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. |
| OIG Analysis: | 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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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 March 25, 2009: The staff has completed this item. The staff's original targeted completion date for this recommendation was December 31, 2008 however that date was extended until January 31, 2009. HRTD engaged the Training effectiveness Working Group to address this recommendation. That group's chairperson requested feedback from the all of the program offices and regions regarding the scheduling of training courses that are required for qualification programs. Specifically, the working group requested feedback for instances where course scheduling problems caused individuals difficulty in completing their qualification program requirements in a timely manner. The working group also requested any other comments regarding scheduled course offerings.

Several organizations provided input prior to January 31, 2009 however several organizations provided additional input in early February 2009. Based on the input received, the working group determined that a continuing dialog is needed to fully understand and address concerns. The working group will continue to coordinate with HRTD to adjust the calendar of scheduled offerings as necessary.

The scheduling changes will be communicated to the program offices and regions in conjunction with Recommendation 7 (communicate courses and dates widely to ensure employees, supervisors, training coordinators, and managers are aware of the annual schedule.) Enclosure 2 is the Training Effectiveness Working Group Roster and Enclosure 3 is a call from the working group to the office and region training coordinators asking for feedback regarding course scheduling. Completion Date: January 31, 2009

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Recommendation 6, continued:

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| OIG Analysis: | OIG reviewed the documentation provided by the Office of Human Resources and verified that HRTD has formed a working group to review the training calendar, identify problems, and develop solutions. This satisfies the recommendation. Therefore, this recommendation is closed. |
| **Status:** | Closed. |

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**Status of Recommendations**

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|---|---|
| Recommendation 7: | 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 March 25, 2009: | There is no change in the status of this recommendation. Targeted Completion Date: June 30, 2009 |
| 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. |
| OIG Analysis: | 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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**Status of Recommendations**

Recommendation 8: 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 March 25, 2009: The iLearn learning management system was searched and 15 courses were identified that required completion of prerequisite courses. A reminder email listing the 15 courses was forwarded to the office and region training coordinators on March 17, 2009. The process for identifying prerequisite course requirements will be incorporated into HRTD Operating Procedure 0403, "Course Administration," by June 30, 2009. The notification email and list of courses with prerequisites are presented in Enclosures 4 and 5. Targeted Completion Date: June 30, 2009

OIG Analysis: This recommendation will be closed once OIG receives documentation that verifies that (1) HRTD Operating Procedure 0403, "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**

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|---|---|
| Recommendation 9: | Develop and implement new performance metrics to demonstrate mission alignment, effectiveness, and efficiency. |
| Agency Response Dated March 25, 2009: | Our original targeted completion date for this recommendation was March 31, 2009. The staff has recently developed an agencywide approach for measuring the effectiveness of training as described in Enclosure 6, Memorandum "Method of Measuring the Effectiveness of Training," from R. W. Borchardt to the Commission, dated February 6, 2009 (ML090130403). After this method has been piloted and evaluated, the staff will have adequate data to evaluate, develop, and implement any necessary new performance metrics. The staff plans to begin using the new method for measuring training effectiveness in Q4 of FY 2009 and will evaluate appropriate performance metrics in Q1 of FY 2010. Targeted Completion Date: December 31, 2009 |
| OIG Analysis: | 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**

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|---|---|
| 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 March 25, 2009: | There is no change in the status of this recommendation. Targeted Completion Date: September 30, 2009 |
| 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. |
| OIG Analysis: | 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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**Status of Recommendations**

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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 Response Dated March 25, 2009: | There is no change in the status of this recommendation. Targeted Completion Date: September 9, 2009 |
| 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: | 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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**Status of Recommendations**

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| Recommendation 12: | Finalize Operating Procedure 410 including a new standardized student feedback form. |
| Agency Response Dated March 25, 2009: | The staff has completed this item. HRTD approved Operating Procedure 0410 to include a new standardized student feedback form. Operating Procedure 0410, "HRTD Training Evaluation," is provided as Enclosure 7. Completion Date: December 22, 2008 |
| OIG Analysis: | OIG reviewed the documentation provided by the Office of Human Resources and verified that HRTD finalized Operating Procedure 410, including a new standardized student feedback form. This satisfies the recommendation. Therefore, this recommendation is closed. |
| **Status:** | Closed. |

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**Status of Recommendations**

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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 March 25, 2009: | There is no change in the status of this recommendation. Targeted Completion Date: March 31, 2010 |
| Agency Response Dated September 22, 2008: | Agree. HRTD will engage its stakeholders to develop an evaluation strategy plan. |
| OIG Analysis: | 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 March 25, 2009: There is no change in the status of this recommendation. Targeted Completion Date: March 31, 2010

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.

OIG Analysis: 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**

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|---|---|
| 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 March 25, 2009: | The staff has completed this item. The staff engaged the services of a contractor to assist in developing an E Learning Vision and Strategy document. That document focuses the agency's strategies for employing Advanced Training Methods (ATMs) to promote exceptional learning and performance within the organization. The E Learning Vision and Strategy document provides the framework for incorporating ATMs in current and future training initiatives to support training effectiveness and efficiency while maximizing individual and organizational performance. The E Learning Vision and Strategy document is presented as Enclosure 8. Completion Date: March 19, 2009 |
| OIG Analysis: | OIG reviewed the documentation provided by the Office of Human Resources and verified that their e-learning vision and strategy document establishes a connection between e-learning and organizational mission, strategy, business objectives, and performance improvement. This satisfies the recommendation. Therefore, this recommendation is closed. |
| **Status:** | Closed. |

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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 March 25, 2009: There is no change in the status of this recommendation. Targeted Completion Date: March 31, 2010

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.

OIG Analysis: 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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**Status of Recommendations**

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 March 25, 2009: There is no change in the status of this recommendation. Targeted Completion Date: March 31, 2010

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.

OIG Analysis: 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.