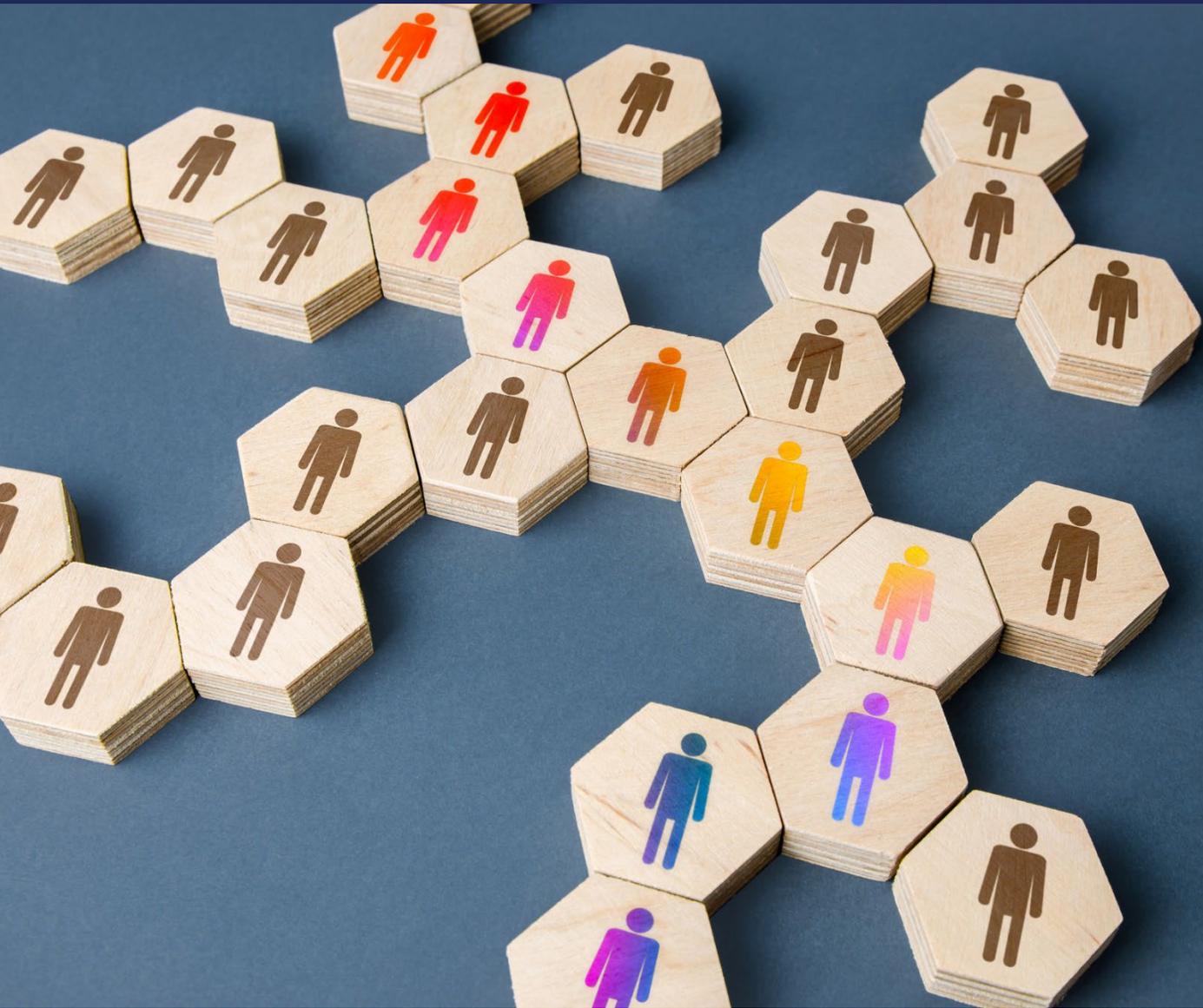




U.S. Consumer Product Safety Commission OFFICE OF INSPECTOR GENERAL



Human Capital Program Assessment

March 30, 2023

23-A-03



VISION STATEMENT

We are agents of positive change striving for continuous improvements in our agency's management and program operations, as well as within the Office of Inspector General.

STATEMENT OF PRINCIPLES

We will:

Work with the Commission and the Congress to improve program management.

Maximize the positive impact and ensure the independence and objectivity of our audits, investigations, and other reviews.

Use our investigations and other reviews to increase government integrity and recommend improved systems to prevent fraud, waste, and abuse.

Be innovative, question existing procedures, and suggest improvements.

Build relationships with program managers based on a shared commitment to improving program operations and effectiveness.

Strive to continually improve the quality and usefulness of our products.

Work together to address government-wide issues.



March 30, 2023

TO: Alexander D. Hoehn-Saric, Chairman
Peter A. Feldman, Commissioner
Richard Trumka Jr., Commissioner
Mary T. Boyle, Commissioner

FROM: Christopher W. Dentel, Inspector General

SUBJECT: Human Capital Program Assessment

The Office of Inspector General (OIG) retained the services of AE Strategies to assess the human capital program at the U. S. Consumer Product Safety Commission (CPSC). AE Strategies specializes in using the Office of Personnel Management's (OPM) Human Capital Framework (HCF) diagnostic tool to help agencies prepare for OPM HCF audits. The HCF tool is designed to consider strategic human capital management and organizational development. It provides senior leaders, supervisors, and human resource practitioners with pragmatic guidance and insights on how to align their human capital efforts with their agency's mission, goals, and program objectives. This assessment was performed in accordance with OPM standards and human capital assessment best practices rather than generally accepted government audit standards. Findings were made based on the preponderance of the evidence standard.

The human capital function is an integral part of the CPSC's strategic plan. According to the strategic plan, "[h]aving a highly trained, diverse, and engaged workforce is critical to meeting the dynamic challenges" the CPSC faces. Additionally, the "CPSC will continue to ensure that the agency's performance management system is effectively used to manage employee performance . . . and . . . aligned to the agency's mission."

AE Strategies found that the CPSC's human capital program does not align with federal regulations and lacks overall accountability. If not corrected, these shortcomings may prevent the CPSC from achieving its mission. Many of the findings and recommendations found in this assessment are over two decades old, and were first identified in OPM evaluations in 1998 and 2008. These recommendations were never resolved, including a finding that the CPSC had not established a system of accountability to ensure that its Human Capital program is managed effectively and efficiently.¹

CPSC management stated that it relies on the Federal Employee Viewpoint Survey (FEVS) results² to provide feedback as to whether its Human Capital program is effectively managed. By this measure, the CPSC ranked 21st of 29 peer agencies (in the bottom 28%) in overall employee satisfaction in the most

¹ OPM, *Human Resources Operations Audit Report Q4 FY2007*, 2008.

² Consumer Product Safety Commission, *Best Places to Work in the Federal Government*, 2022.

recently available compilation of FEVS data. While employees reported being supportive of the mission, they had concerns about supervision. This measure placed the CPSC at 21st of 29 peer agencies (in the bottom 28%). Another FEVS measure, employee skills to mission match, placed the CPSC at 23rd of 29 peer agencies (in the bottom 20%). With regard to recognition, the extent to which employees feel they are recognized for their performance and innovative contributions to their workplaces, the CPSC ranked 25th of 29 peer agencies (in the bottom 15%). Finally, related to COVID: Employee Well-Being, the extent to which employees feel that their organization supported their physical and mental well-being during the COVID-19 pandemic, the CPSC found itself at 24th of 29 peer agencies (in the bottom 18%).

This report contains 41 recommendations. If implemented, these recommendations will improve the human capital function at the CPSC and help the agency achieve its mission. AE Strategies states that the benefit of a high-performing human capital function will include an effective strategic planning function, strategies to help the CPSC attract and retain employees, and monitoring to improve mission support. The AE Strategies review and the FEVS results show that the CPSC does not have a high-performing human capital function.

To date, despite generally acknowledging the potential value that would be added if they implemented them, agency management has non-concurred with 8 of 41 recommendations. The primary reasons cited for nonconcurrence are that the CPSC is not legally obligated to take the actions in question and has limited human capital resources. See Appendix H for our rebuttal.

Should you have any questions, please contact me.



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Introduction

The human capital (HC) function supports the U.S. Consumer Product Safety Commission (CPSC) in its mission to save lives and keep families safe by reducing the unreasonable risk of injuries and deaths associated with consumer products. At the CPSC, the HC function is performed by the Office of Human Resources Management (EXRM) which reports to the Office of the Executive Director. The CPSC acknowledged the importance of the HC function in 2018 by making "Workforce" one of the agency's four strategic goals.

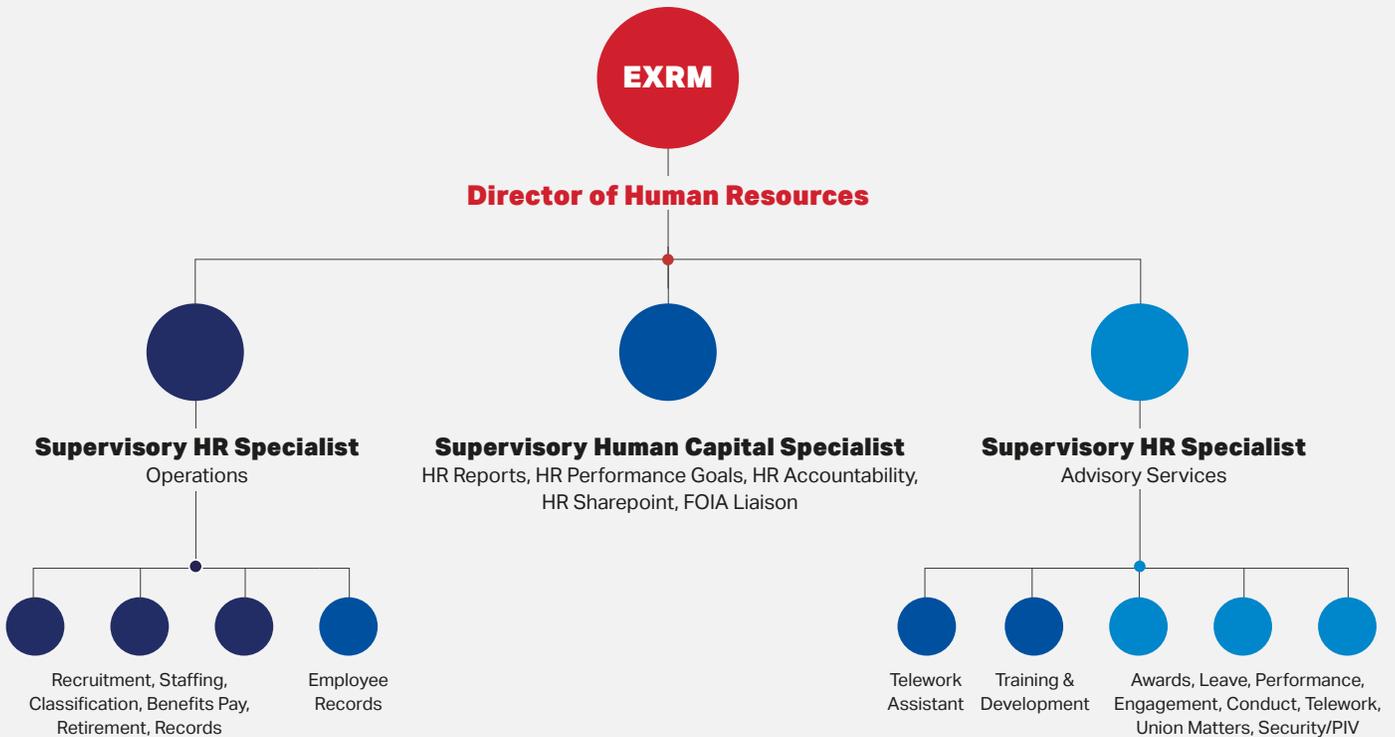
Benefits of a high-performance HC function within CPSC will include:

- effective strategic planning to help offices meet changing needs and align with changing agency priorities
- a suite of strategies to help CPSC recruit and retain employees
- continuous monitoring to improve HC effectiveness in support of the mission
- support with the administrative tasks associated with routine HC functions

On behalf of the CPSC Office of Inspector General, AE Strategies was contracted to perform an independent assessment of the CPSC's HC management practices. The scope of this assessment spanned fiscal years (FY) 2020 – 2022, and fieldwork for this review was performed from November 2021 to June 2022. Please note the following areas were not in scope for this assessment: employee engagement, Federal Employee View Survey results, contractor management, union/collective bargaining processes, or sections A7 through A9 of the Human Capital Operational Lifecycle as described in the Federal Human Capital Business Reference Model.

At the CPSC EXRM is responsible for defining the strategic direction of the agency's Human Capital Program, aligning that program with the CPSC's Human Capital Operating Plan (HCOP), and documenting this direction in a Human Capital Strategic Plan every five years. The CPSC's most recent HCOP is dated November 2020. However, EXRM was unable to provide a complete HCOP. EXRM has defined the following as Human Capital Strategic Objectives: (1) enhance effective strategic HC planning and alignment; (2) foster a culture of continuous development; (3) attract and recruit a talented and diverse workforce; and (4) increase employee engagement.

EXRM Organizational Structure



The federal Office of Personnel Management (OPM) provides oversight of all federal HC functions, including EXRM. OPM reviewed the HC function at the CPSC in 1998 and 2007. The 2007 report noted some of the same issues identified in this report: informal workforce planning and succession planning, no evaluation of the effectiveness of the annual evaluation system and the awards program and weak job analyses. Finally, the 2007 report noted that the CPSC had not established a system of accountability to ensure that its HC is managed effectively and efficiently.



Methodology

In performing this assessment, we used OPM's Human Capital Framework (HCF). The HCF incorporates insights from strategic HC management to provide senior leaders, supervisors, human resources (HR) practitioners, and employees with practical guidance and insights on how to align their HC program with their agency's mission, goals, and program objectives.

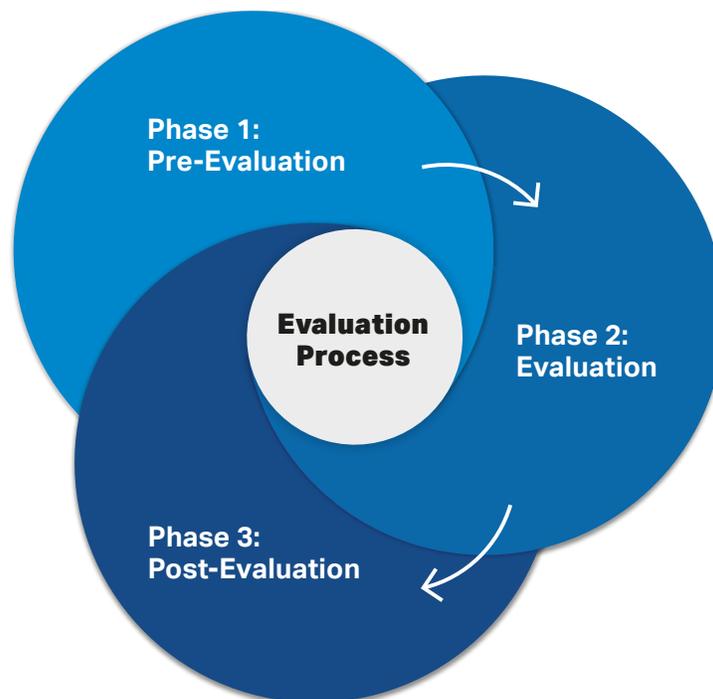
The HCF is organized across four systems:

1. Strategic Planning and Alignment System
2. Talent Management System
3. Performance Management System
4. Evaluation System

Within each of these systems, a series of focus areas has been defined ([Appendix B](#)). We evaluated these areas utilizing a series of checklists developed for each HC system. Although the focus areas aren't all-inclusive, they incorporate key elements and requirements to consider when implementing each of the systems. An agency's HCF evaluation system should contribute to organizational performance as a mechanism for monitoring and evaluating HC outcomes.

Evaluation Process

This evaluation followed the process outlined below. The three-phased process was implemented to ensure our (1) extensive evaluation strategy encompassed each component of the office's functional areas, (2) evaluation methods were tailored to data input sources, and (3) results would be aggregated and analyzed to produce actionable recommendations.



Phase 1: Pre-evaluation

Includes evaluation notification/ timeframe, identification of the coverage and scope, request for documentation, and interview planning.

Phase 2: Evaluation

Includes interviews, record/ document review with OPM pre-defined checklists.

Phase 3: Post-evaluation

Includes research and reporting of final evaluation findings and recommendations.¹

¹ Evaluators will analyze relevant data from personnel action trends, review prior report findings, agency policy and programs. All processes/ activities will be compared against applicable laws, regulations, policies, standard operating procedures, etc.



Evaluation Components

Subject Matter Expert Questionnaires - Used to gather information about a particular area and specific tasks that relate to the participant's area of responsibility

Checklists – Tool used to ensure accuracy and reduce risk of missing important items

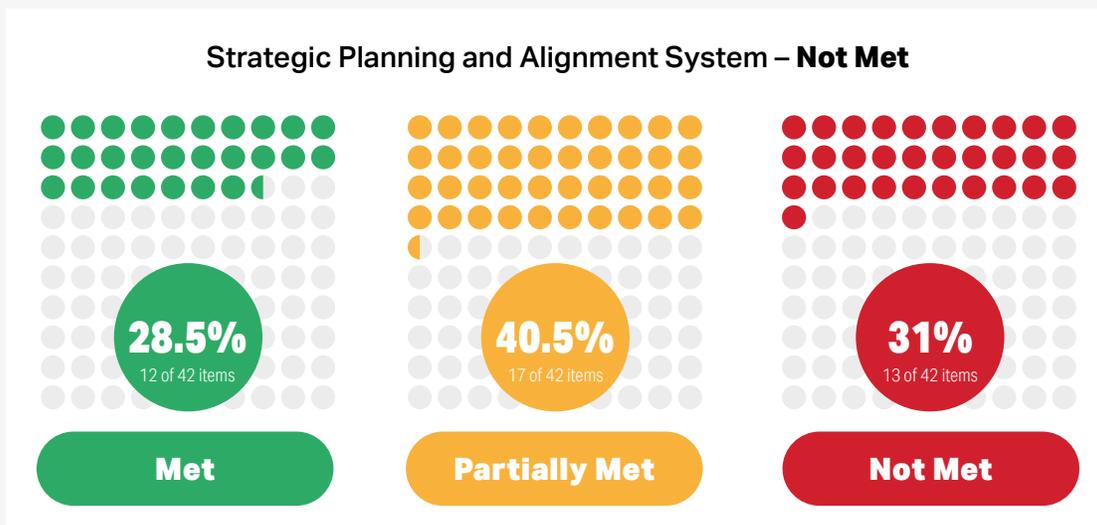
Interviews – Structured conversations used to exchange information

Agency Data – Reviewed information and documents stored by an agency or organization

Assessment Results

AE Strategies assessed the EXRM's HCF compliance across OPM's four Human Capital Systems: **Strategic Planning and Alignment, Talent Management, Performance Management, and Evaluation**. The charts displayed at the beginning of each HC system represent the results of our assessment ([Appendix C](#)).

Strategic Planning and Alignment System Results



Met: Compliance was achieved

Partially Met: Some aspects of compliance were achieved

Not Met: Compliance was not achieved

The purpose of this portion of the assessment is to ensure the CPSC's HC programs were in alignment with the agency's mission, goals, and objectives through analysis, planning, investment, and measurements. Federal regulations, [Title 5 Code of Federal Regulation 250.205](#), require federal agency Chief Human Capital Officers to develop an HCOP.



The CPSC's Strategic Planning & Alignment program does not align with federal regulations and lacks HC management practices, business outcomes, and organizational goals. The data provided did not show a link from EXRM's strategic planning documents to the organizational goals because the CPSC's internal HCOP and policies lack metrics and clarity. The CPSC could not provide evidence that the FY 2021 strategic goals associated with HC strategic planning and alignment were implemented or initiated.

We considered the following sections from the HCF standards when performing this portion of the review:

- integrate strategic plans, annual performance plans, budgets, finance, and acquisitions
- measure and observe performance targets
- communicate and collaborate openly and transparently with agency management to achieve mission objectives

Desired outcomes from strategic planning and alignment:

- mission focused operations
- clear opportunities for best practices
- focused measures and self-assessment
- informed and engaged stakeholders

EXRM has made progress in the following:

- documented and distributed a partial HCOP
- performance plans to include HC strategies, goals, and objectives

EXRM has not:

- implemented strategic plans and policies
- aligned workforce priorities to the:
 - strategic plan
 - budget
 - HCOP
- communicated completed HCOP and other relevant documents to all stakeholders
- demonstrated that the FY 2021 strategic goals were initiated or implemented
- provided accurate data to stakeholders

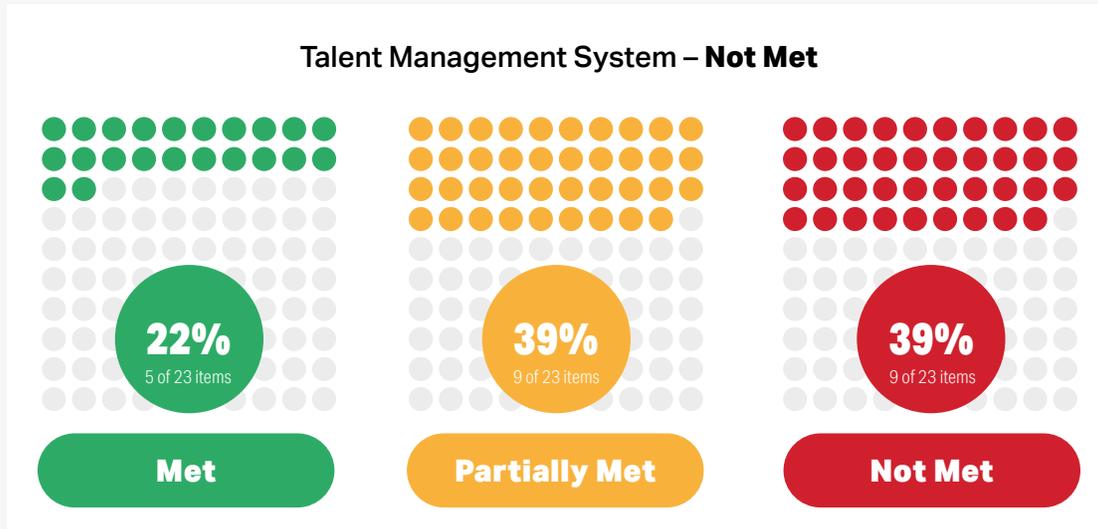


- developed appropriate metrics to measure program effectiveness
- updated and published directives and Standard Operating Procedures (SOP) for all major HC areas and routine HC tasks

Strategic Planning and Alignment System Recommendations

1. Create and publish an HCOP that conforms to current OPM guidance.
2. Align HCOP and other EXRM strategic planning documents with the agency's Strategic Plan.
3. Align and demonstrate how HCOP objectives and actions reflect HCF system standards.
4. Design and implement agency policies which describe how the use of data will support sound HC strategies and identify process improvements. This should include a process to identify deficiencies and a plan for remediation.
5. Establish formal communication strategies with all appropriate agency stakeholders (messages, briefings, policies etc.).
6. Publish all policy documents to appropriate staff.
7. Establish communication channels with appropriate offices as well as establish a feedback mechanism regarding diversity, equity, and inclusion.
8. Review and update all human capital policies, e.g., HCOP, Human Capital Policy, and Delegated Examining Policy, at least every five years.
9. Beginning with HCOP objectives, develop a clear feedback loop regarding policy implementation between EXRM and senior management on a regular basis, preferably at least quarterly.
10. Assess the impact of HC policies, programs, strategic goals, and initiatives on organizational performance, and develop and hold staff accountable to meet milestones designed to implement new policies, programs, and initiatives.
11. Implement and report to agency senior management on measures of the effectiveness of new policies, programs, and initiatives.
12. Develop key performance measures that reflect the effectiveness of EXRM's support of the CPSC's mission.
13. Use data developed in the new performance measures to correct any deficiencies and improve HC policies and programs.
14. Update and publish directives and SOPs for all major HC areas and routine HC tasks.

Talent Management System Results



The purpose of this portion of the assessment is to ensure that the agency is promoting a high-performing workforce, identifying and closing skill gaps; in addition to implementing and maintaining programs to attract, acquire, develop, promote, and retain quality and diverse talent.

The CPSC's Talent Management program does not meet OPM's standards. The documents provided lack the mandated HC elements necessary to meet organizational goals. EXRM did not perform an analysis to determine the current workforce competencies and identify skill gaps. HC strategies were not correlated with the agency's HC needs to ensure the organization is structured effectively.

We considered the following sections from the HCF standards when performing this portion of the review:

- plan and manage current and future workforce needs
- design, develop, and implement proven strategies and techniques and practices to attract, hire, develop, and retain talent
- make progress toward closing knowledge, skill, and competency gaps throughout the agency



To complete our work for this section we benchmarked EXRM staff levels as compared to overall agency size against peers (**Appendix D**). We also reviewed turnover data provided by agency staff (**Appendix E**).

Desired outcomes from talent management

- ready workforce
- employee investment
- efficient operation
- increased retention (turnover analysis can be found in **Appendix E**)

EXRM has made progress in the following:

- initiated steps to document a plan to recruit and acquire sufficient talent
- documented Merit Promotion Plan which depicts a path to promote qualified individuals fairly based on knowledge and abilities

EXRM has not:

- communicated how the agency supports their outreach programs by implementing a variety of programs that align with strategic goals
- identified and managed ongoing relationships with recruiting and outreach sources
- demonstrated the agency's recruitment efforts support a diverse workforce
- provided documentation supporting work on the Federal Workforce Priorities Report
- utilized data such as new hire documentation, hiring manager survey results, or cost benefit analyses to develop or improve strategies for recruitment
- completed a full Strategic Workforce Plan
- identified gaps within Mission Critical Occupations
- developed a Mission Critical Occupation Plan, as recommended by the U.S. Government Accountability Office²
- analyzed turnover by office to identify potential employee retention problems
- taken advantage of all hiring flexibility available under the law

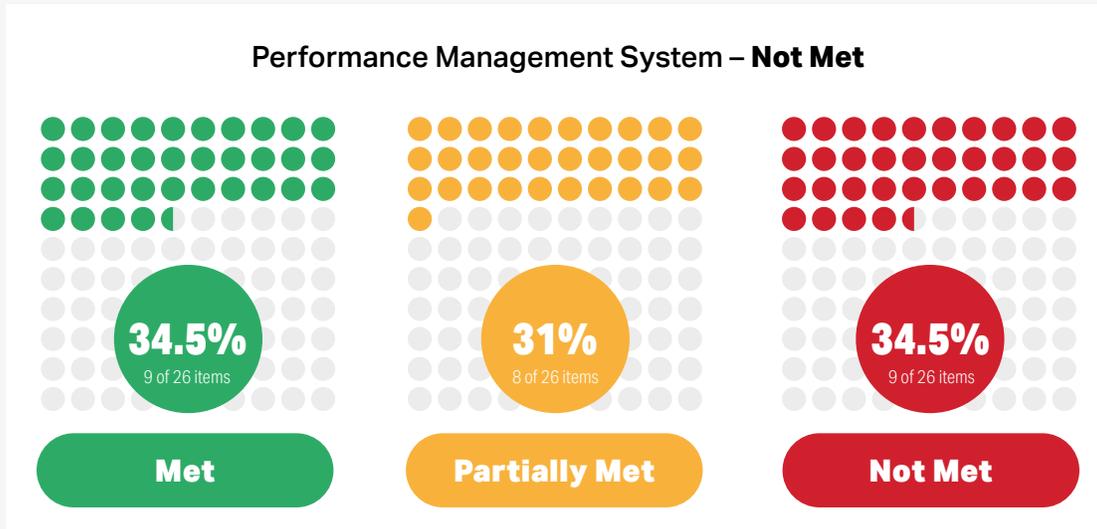
2 GAO-21-119SP <https://www.gao.gov/assets/gao-21-119sp.pdf>



Talent Management System Recommendations

15. Create and publish a succession plan and supporting documents that conform to current OPM guidance, to include backfill and reorganization plans, and a list of all Mission Critical Occupations.
16. Require periodic reviews of all succession planning elements to foster continuous improvement.
17. Create and publish a policy document documenting steps to increase diversity outreach when hiring new employees.
18. Identify and manage ongoing relationships with recruiting and outreach sources.
19. Implement steps to address the federal government-wide priorities identified in the Federal Workforce Priorities Report.
20. Identify the CPSC-specific skill and competency gaps and establish a process to close those gaps.
21. Develop initiatives through Strategic Workforce Plans.
22. Develop and implement an annual assessment and review process of the Mission Critical Occupations plan.
23. Develop and implement a process to report turnover data by office to senior agency management at least annually. This process should include feedback between EXRM, senior agency management, and staff in the affected offices.
24. Review policy and programs that directly relate to recruitment and retention such as: retention bonuses, flexible pay bands for hard-to-fill positions, career ladder positions, cross-training, easier hiring processes, and other flexibilities at HR's disposal to recruit and retain qualified employees.

Performance Management System Results



The purpose of this portion of the assessment is to evaluate the agency's ability to engage, develop, and inspire a diverse, high-performing workforce by creating, implementing, and maintaining effective performance management strategies, practices, and activities that support mission objectives.

While the CPSC was able to provide documents to support its performance management system, there was little or no evidence of communication about the policy to staff or its implementation. The CPSC was unable to provide comprehensive strategies and practices designed to improve the effectiveness of agency efforts to recruit, hire, promote, retain, develop, and train a diverse and inclusive workforce.

We considered the following sections from the HCF standards when performing this portion of the review:

- implement strategies and processes to foster a culture of engagement and collaboration
- create a diverse, results-oriented, high-performing workforce
- develop a performance management system that differentiates levels of performance of staff, provides feedback, and links individual performance to organizational goals



Desired outcomes from performance management:

- diverse and inclusive workforce and environment
- work-life balance
- motivated workforce
- a well-trained workforce
- increased customer and employee satisfaction with EXRM services
- performance management system aligned with agency strategic goals
- rewards and recognition program valued by employees
- increased external awareness for mission-related outcomes

EXRM has made progress in the following:

- maintains a performance appraisal system
- maintains bonus and awards program
- maintains demographics of the organization

EXRM has not:

- documented and implemented a policy to meet the agency-specific HC requirements of Executive Orders 13583³ and 14035⁴
- has not published formal policies and procedures governing performance management within the CPSC
- documented employee opinion and satisfaction with work-life balance initiatives
- measured the utilization and effectiveness of its training programs
- evaluated the effectiveness of bonus and awards programs

3 Executive Order 13583 - Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce, <https://obamawhitehouse.archives.gov/the-press-office/2011/08/18/executive-order-13583-establishing-coordinated-government-wide-initiativ>

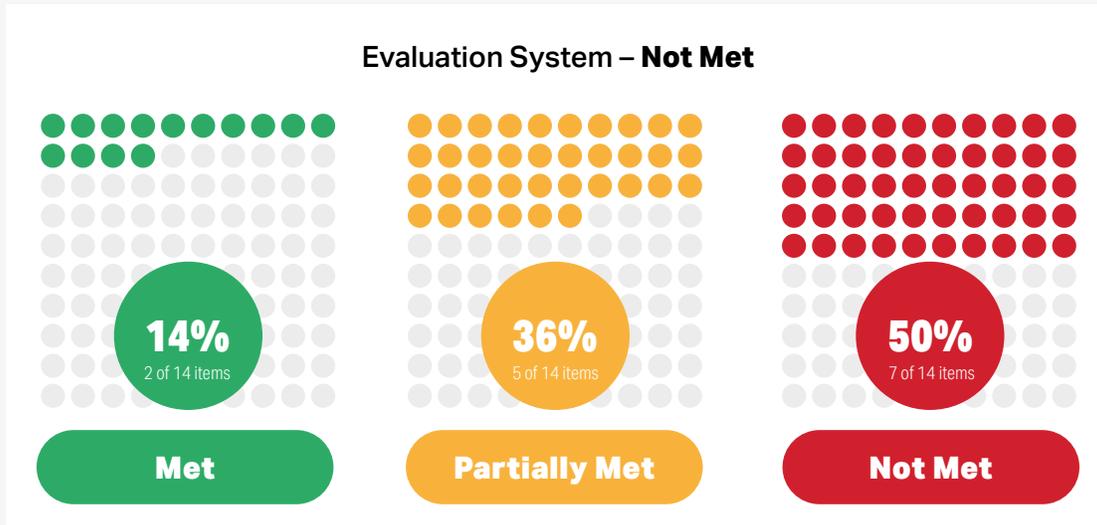
4 Executive Order 14035 - Executive Order on Diversity, Equity, Inclusion and Accessibility in the Federal Workforce: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/25/executive-order-on-diversity-equity-inclusion-and-accessibility-in-the-federal-workforce/>



Performance Management System Recommendations

25. Develop and implement policies and procedures to meet the agency-specific diversity and inclusion requirements of Executive Orders 13583 and 14035.
26. Publish formal policies and procedures governing performance management within the CPSC.
27. Create and distribute a survey to all employees regarding employee satisfaction with work life balance initiatives and publish the results. Repeat this process at least annually.
28. Present and implement a plan to address employee concerns voiced in the survey.
29. At the end of each EXRM-provided training, provide employees with the option to provide feedback on the utility of each training provided.
30. Create and distribute a survey to all employees regarding effectiveness and employee satisfaction with the employee awards program and each office's bonus pool and publish the results. Repeat this process biennially.
31. Create and distribute a survey to all employees regarding satisfaction with EXRM services, at least annually.
32. Present and implement a plan to address employee concerns after each survey.
33. Develop performance management measures for each job series using a 360-feedback mechanism and appropriate data to set targets to drive improvement.

Evaluation System Results



The purpose of this portion of the assessment is to evaluate the agency's assessment system, which contributes to agency performance by monitoring and evaluating outcomes of an agency's HC management strategies, policies, programs, and activities.

These evaluations program policies are not identifiable in any of the documents the CPSC provided. Current and past practices, including workforce and performance data, metrics and results, and plans for future strategic and operational requirements were not provided. No systematic, flexible, and inclusive process exists to gather relevant information to identify solutions for complex situations. The data to support strategic and operational decisions does not exist.

We considered the following sections from the HCF standards when performing this portion of the review:

- ensure compliance with merit system principles
- identify, implement, and monitor process improvements

Desired outcomes from the assessment system:

- continuous and innovative improvement



- informed decisions
- integrity
- excellence

EXRM has made progress in the following:

- Publishing an internal policy regarding HC policies.

EXRM has not:

- created HC assessment policies in accordance with OPM regulations and guidelines
- conducted internal reviews of policies and programs
- used data to support and measure targets for each HC goal or objective
- developed a plan to evaluate agency performance against the HCOP
- completed OPM mandated self-audits
- communicated goals and objectives to CPSC leadership
- provided EXRM staff with adequate training for completing self-assessments

Evaluation System Recommendations

- 34.** Develop and implement HC assessment policies that align with OPM regulations and guidelines to include:
 - how the CPSC evaluates its HR practices
 - roles and responsibilities regarding required assessments
 - allocation of available resources to support and implement assessments
 - milestones and measures used to determine success in assessments.
- 35.** Utilize all available data sources in a targeted, data-driven manner to assess HC programs effectiveness and success. Follow-up on the results of assessments via formal written reports and hold personnel accountable to ensure the findings do not continue to occur in the future.
- 36.** Develop and implement a plan to align the assessment program outcomes to HCOP goals and initiatives, at least annually, to include a review of any corrective actions taken to resolve prior year issues. Report the results to agency senior management.



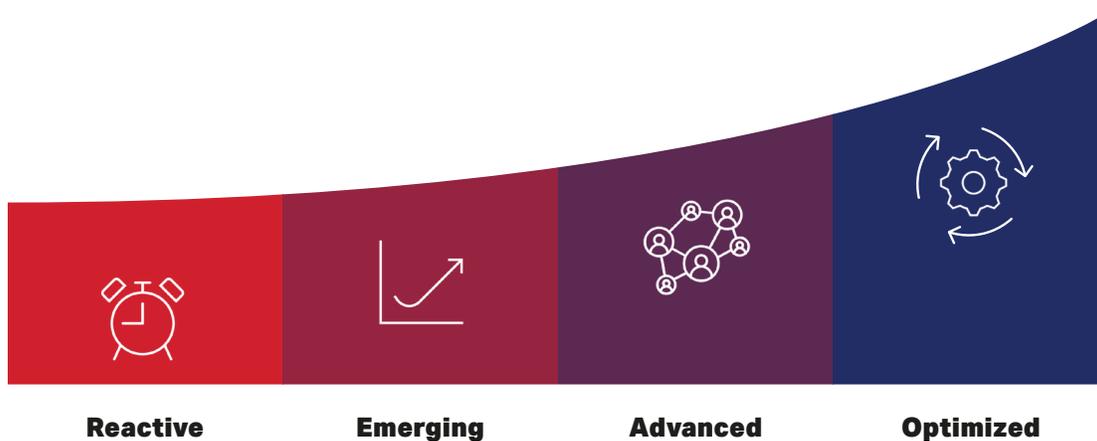
- 37.** Develop a guide for evaluating the CPSC's implementation of its HCF against best practices. This guide should include the following topics: technology solutions, resources, talent management, diversity of thought, risks, and collaborative efforts to improve operating efficiencies.
- 38.** Complete annual self-audits as required by OPM guidance.
- 39.** Initiate a communication plan and distribute this plan across the CPSC to all appropriate stakeholders. The plan should establish formal communication strategies with all appropriate agency stakeholders (messages, briefings, briefing notes, policies etc.).
- 40.** Measure the effectiveness of the communication plan through surveys, website traffic, community of practice involvement, cross-agency initiatives, training, and other internal communications.
- 41.** Provide EXRM staff with appropriate training and resources to complete mandated annual self-assessments.

Maturity Model Results

The HCF maturity model reflects a combined score based on the four HCF system components shown previously. This model considers HC practices across all the HCF system components and provides a unified score to show overall HC maturity. It provides a reader with a baseline for EXRM's current HC state.

Maturity model level definitions:

- **Reactive:** An agency does not have formal processes in place and only becomes involved when an issue occurs, which results in inconsistencies and limited desired outcomes to facilitate change across the organization.
- **Emerging:** An agency has established processes in place that result in the agency generally achieving its desired outcome, but not always. Some inconsistencies may still occur within the agency.
- **Advanced:** An agency has fully integrated all HCF policies and procedures into their HC strategy and operations and operates in a way the agency achieves the desired results against established benchmarks to facilitate change within the agency.
- **Optimized:** An agency is engaged and focused on continual improvement to ensure the agency operates effectively and efficiently. The agency is considered a leader and is recognized for establishing best practices for other agencies to implement and use.





Our assessment indicates the EXRM is at the **Reactive** maturity level for each of the HC systems we evaluated. To reach the emerging level, the CPSC will need to implement all the recommendations found in **Appendix F**.

Why is the CPSC's Human Capital Program Reactive?

- EXRM has not developed and implemented complete policies which include: (1) a basic outline of how the agency's assessment system operates (2) a definition of roles and responsibilities for all HC activities, and (3) timeframes for implementation
- EXRM does not have a formal communications plan and does not effectively communicate policies agency-wide
- EXRM does not have a formal self-assessment process
- EXRM does not provide CPSC leadership with the information necessary to permit sufficient oversight of EXRM programs and planning
- EXRM does not have a robust and effective data collection and analysis function. Data collection is not tied to organizational measures and goals
- EXRM does not have an effective Human Capital Evaluation system and thus cannot identify compliance gaps and drive continuous improvement



Conclusion

We have determined that EXRM lacks overall accountability. Many of the recommendations and concerns that were found in this assessment were identified in previous OPM evaluations (1998 and 2007), and continue unresolved today. Without accountability, EXRM is on an unsustainable track that will prevent the CPSC from achieving its mission.

The management of the CPSC Human Capital Program is a shared responsibility among the CPSC leadership and staff. Effective management of HC programs is essential for hiring, managing, training, rewarding, and retaining a high-performing workforce. The CPSC needs to ensure their HC management strategies and programs support the agency goals identified in its formal policies and other performance tools and mechanisms.

We performed our evaluation, testing, and analysis in accordance with the criteria found in [Appendix G](#). We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our review objectives.



Appendices

Appendix A: Acronyms & Abbreviations

CPSC U.S. Consumer Product Safety Commission

EXHR Office of Hazard Identification and Reduction

EXRM Office of Human Resources Management

FY Fiscal Year

HC Human Capital

HCF Human Capital Framework

HCOP Human Capital Operating Plan

HR Human Resources

OPM Office of Personnel Management

SOP Standard Operating Procedures



Appendix B: Focus Areas

These focus areas are key elements when implementing the four Human Capital Framework systems. EXRM should incorporate these areas to measure progress and provide outcomes for their policy effectiveness.

- Agency Strategic Planning
- Annual Performance Planning
- Strategic Human Capital Planning
- Human Capital Best Practices and Knowledge Sharing
- Human Resources as a Strategic Partner
- Organizational Development
- Change Management
- Workforce Planning
- Employee Development
- Leadership Development
- Retention
- Knowledge Management
- Engaged Employees*
- Performance Management
- Diversity and Inclusion*
- Labor/Management Relations*
- Work-Life
- Business Analytics
- Data Driven Decision-Making

See [OPM's Structure of the Human Capital Framework](#) for an explanation of each of the above focus areas.

*Not fully included in this assessment



Appendix C: Human Capital Framework Summary & Status

Strategic Planning and Alignment		
Focus Area	Assessment	Checklist #
Agency Strategic Planning: Mission statement, goals, objectives and how they contribute to agency and government goals.	Met	1,2
	Partially Met	-
	Not Met	3,4
Annual Performance Planning: Performance goals quantified and measured. How goals relate to agency and federal mission goals.	Met	-
	Partially Met	7
	Not Met	5,6
Strategic Human Capital Planning: Develop results-focused framework of HC policies, programs and practices to achieve HC goals.	Met	13,14
	Partially Met	8,9,10,11,12,15,16
	Not Met	-
Human Capital Best Practices and Knowledge Sharing: Agency works internally and externally to share best practices, implement new processes and procedures.	Met	19,22
	Partially Met	24
	Not Met	17,18,20,21,23
Human Resources as a Strategic Partner: HR professionals consult with managers to develop, implement, assess, recommend, and implement policies and practices.	Met	25,27
	Partially Met	26
	Not Met	-
Organizational Development: Leadership establishes a systematic approach for evaluating organizational effectiveness, which improves mission objectives and performance.	Met	33,34
	Partially Met	28,29,30
	Not Met	31,32
Change Management: Leadership commits to reviewing, implementing, and communicating organizational initiatives and measures to improve organizational performance.	Met	36,37
	Partially Met	38,39,40,41
	Not Met	35,42



Talent Management

Focus Area	Assessment	Checklist #
Recruitment and Outreach: Recruitment measures are in place that ensure HR professionals and hiring managers are attracting diverse and qualified candidates.	Met	6,7,9
	Partially Met	1,5,8
	Not Met	2,3,4,10,11
Leadership Development: Establishes a comprehensive alignment of competencies to enhance the quality of leadership across the organization.	Met	12,20
	Partially Met	13,14,17,18,21,22
	Not Met	15,16,19,23

Performance Management

Focus Area	Assessment	Checklist #
Performance Management: Agency creates strategic performance objectives and uses data to drive performance and improvement.	Met	1,2,3,4,5,6,8
	Partially Met	9,10,11,12,17,19,20,21
	Not Met	7,13,14,15,16,18,22,23
Diversity and Inclusion: Agency creates and implements strategies and practices to improve the effectiveness of efforts to recruit, hire, promote, retain, develop and train workforce.	Met	24,26
	Partially Met	-
	Not Met	25

Evaluation System

Focus Area	Assessment	Checklist #
Business Analytics: Agency reviews current activities and past practices, workforce and performance data, metrics, and strategic and operational requirements.	Met	1
	Partially Met	2,3,5,7,8
	Not Met	4,6,9,10
Data Driven Decision Making: Agency implements a systematic, flexible process to gather data and uses it to support strategic and operational goals.	Met	11
	Partially Met	-
	Not Met	12,13,14

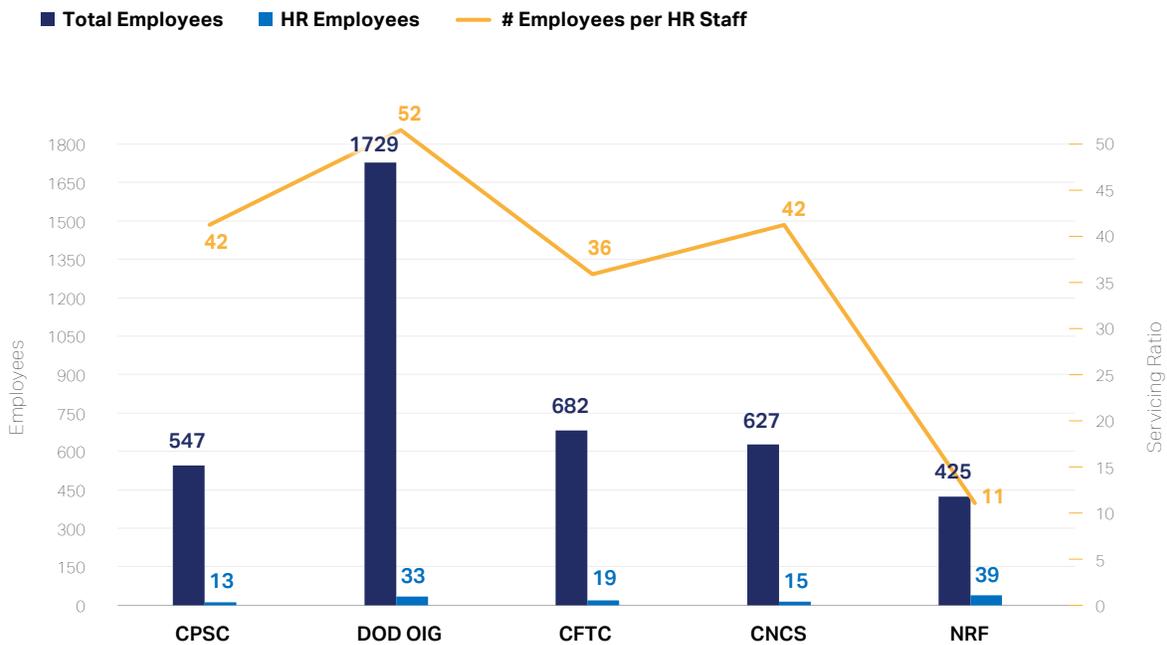


Appendix D: Benchmarking

As part of our analysis we benchmarked EXRM against four peers. We benchmarked human resources staff to agency size and HR supervisory ratio to gain an understanding of possible workload issues.

Benchmarking data is used to make comparisons in key areas against similar agencies to assess whether current practices are sufficient or identify potential areas for change. HR servicing ratio is the number of employees, on average, each HR employee is expected to serve and is a simple calculation of total employees/HR employees. The higher number means a heavier workload. We also compared the supervisory ratio in EXRM to its peers.

HR Workload Data





HR Supervisory Ratio

Organization	All HR Employees	Managers/ Supervisors	HR Supervisory Ratio*
CPSC	13	3	1:3.3
DOD OIG Department of Defense Office of Inspector General	33	6	1:4.5
CFTC Commodity Futures Trading Commission	19	4	1:3.8
CNCS Corporation for National and Community Service	15	2	1:6.5
NRF Navy Reserve Force	39	3	1:12.0
Total/Average	119	18	1:5.6

* HR supervisory ratio is calculated as follows (total HR employees-managers/supervisors)/supervisors.

E.g. (13-3)/3=1:3.3

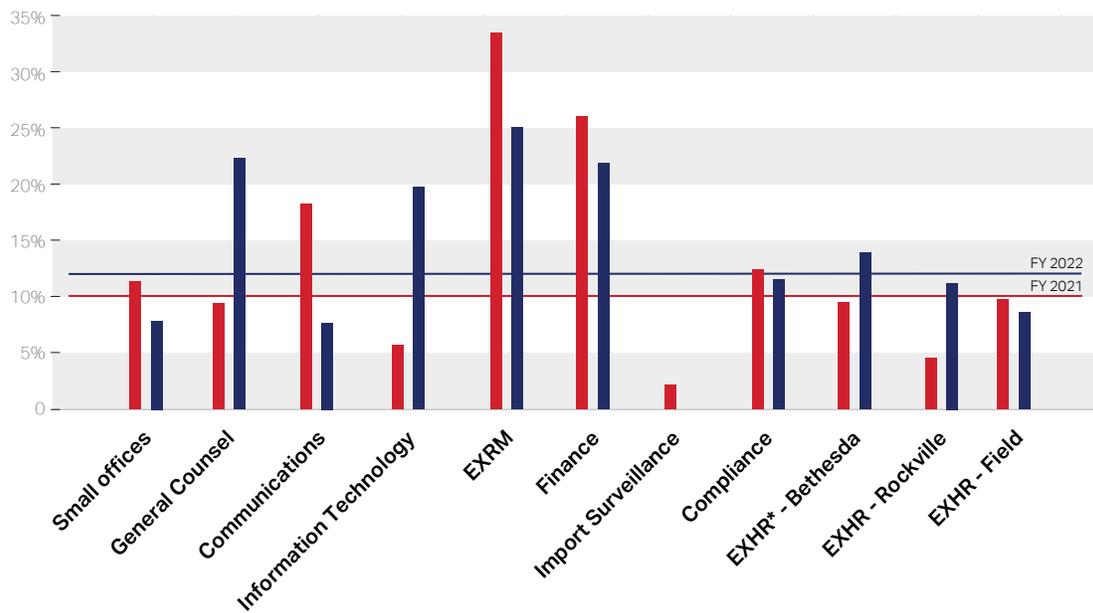


Appendix E: Historical Turnover Data

This graph displays the turnover rate for both FY 2021 and 2022 for each office at the CPSC with more than 10 employees and includes the CPSC-wide average for each fiscal year.

CPSC Turnover Rate by Department

■ FY 2021 Turnover Rate ■ FY 2022 Turnover Rate



* EXHR Office of Hazard Identification and Reduction



Appendix F: Consolidated List of Recommendations

1. Create and publish an HCOP that conforms to current OPM guidance.
2. Align HCOP and other EXRM strategic planning documents with the agency's Strategic Plan.
3. Align and demonstrate how HCOP objectives and actions reflect HCF system standards.
4. Design and implement agency policies which describe how the use of data will support sound HC strategies and identify process improvements. This should include a process to identify deficiencies and a plan for remediation.
5. Establish formal communication strategies with all appropriate agency stakeholders (messages, briefings, policies etc.).
6. Publish all policy documents to appropriate staff.
7. Establish communication channels with appropriate offices as well as establish a feedback mechanism regarding diversity, equity, and inclusion.
8. Review and update all human capital policies, e.g., HCOP, Human Capital Policy, and Delegated Examining Policy, at least every five years.
9. Beginning with HCOP objectives, develop a clear feedback loop regarding policy implementation between EXRM and senior management on a regular basis, preferably at least quarterly.
10. Assess the impact of HC policies, programs, strategic goals, and initiatives on organizational performance, and develop and hold staff accountable to meet milestones designed to implement new policies, programs, and initiatives.
11. Implement and report to agency senior management on measures of the effectiveness of new policies, programs, and initiatives.
12. Develop key performance measures that reflect the effectiveness of EXRM's support of the CPSC's mission.
13. Use data developed in the new performance measures to correct any deficiencies and improve HC policies and programs.
14. Update and publish directives and SOPs for all major HC areas and routine HC tasks.
15. Create and publish a succession plan and supporting documents that conform to current OPM guidance, to include backfill and reorganization plans, and a list of all Mission Critical Occupations.
16. Require periodic reviews of all succession planning elements to foster continuous improvement.



17. Create and publish a policy document documenting steps to increase diversity outreach when hiring new employees.
18. Identify and manage ongoing relationships with recruiting and outreach sources.
19. Implement steps to address the federal government-wide priorities identified in the Federal Workforce Priorities Report.
20. Identify the CPSC-specific skill and competency gaps and establish a process to close those gaps.
21. Develop initiatives through Strategic Workforce Plans.
22. Develop and implement an annual assessment and review process of the Mission Critical Occupations plan.
23. Develop and implement a process to report turnover data by office to senior agency management at least annually. This process should include feedback between EXRM, senior agency management, and staff in the affected offices.
24. Review policy and programs that directly relate to recruitment and retention such as: retention bonuses, flexible pay bands for hard-to-fill positions, career ladder positions, cross-training, easier hiring processes, and other flexibilities at HR's disposal to recruit and retain qualified employees.
25. Develop and implement policies and procedures to meet the agency-specific diversity and inclusion requirements of Executive Orders 13583 and 14035.
26. Publish formal policies and procedures governing performance management within the CPSC.
27. Create and distribute a survey to all employees regarding employee satisfaction with work life balance initiatives and publish the results. Repeat this process at least annually.
28. Present and implement a plan to address employee concerns voiced in the survey.
29. At the end of each EXRM-provided training, provide employees with the option to provide feedback on the utility of each training provided.
30. Create and distribute a survey to all employees regarding effectiveness and employee satisfaction with the employee awards program and each office's bonus pool and publish the results. Repeat this process biennially.
31. Create and distribute a survey to all employees regarding satisfaction with EXRM services, at least annually.
32. Present and implement a plan to address employee concerns after each survey.
33. Develop performance management measures for each job series using a 360-feedback mechanism and appropriate data to set targets to drive improvement.



- 34.** Develop and implement HC assessment policies that align with OPM regulations and guidelines to include:
 - how the CPSC evaluates its HR practices
 - roles and responsibilities regarding required assessments
 - allocation of available resources to support and implement assessments
 - milestones and measures used to determine success in assessments.
- 35.** Utilize all available data sources in a targeted, data-driven manner to assess HC programs effectiveness and success. Follow-up on the results of assessments via formal written reports and hold personnel accountable to ensure the findings do not continue to occur in the future.
- 36.** Develop and implement a plan to align the assessment program outcomes to HCOP goals and initiatives, at least annually, to include a review of any corrective actions taken to resolve prior year issues. Report the results to agency senior management.
- 37.** Develop a guide for evaluating the CPSC's implementation of its HCF against best practices. This guide should include the following topics: technology solutions, resources, talent management, diversity of thought, risks, and collaborative efforts to improve operating efficiencies.
- 38.** Complete annual self-audits as required by OPM guidance.
- 39.** Initiate a communication plan and distribute this plan across the CPSC to all appropriate stakeholders. The plan should establish formal communication strategies with all appropriate agency stakeholders (messages, briefings, briefing notes, policies etc.).
- 40.** Measure the effectiveness of the communication plan through surveys, website traffic, community of practice involvement, cross-agency initiatives, training, and other internal communications.
- 41.** Provide EXRM staff with appropriate training and resources to complete mandated annual self-assessments.



Appendix G: Criteria Documents

Human Capital Framework

Source: Office of Personnel Management

<https://www.opm.gov/policy-data-oversight/human-capital-framework/#url=Human-Capital-Framework-Structure>

Human Capital Framework | Diagnostic Tool

Source: Office of Personnel Management

https://www.opm.gov/policy-data-oversight/human-capital-management/human-capital-framework-assessment/shared/Diagnostic_Tool.html

Human Capital Framework | Maturity and Logic Model

Source: Office of Personnel Management

<https://www.opm.gov/policy-data-oversight/human-capital-framework/reference-materials/tools/human-capital-reviews.pdf>

Code of Federal Regulations

Source: National Archives and Records Administration

<https://www.ecfr.gov>



Appendix H: OIG Comments Regarding the Management Response

Agency management non-concurred with 8 of 41 recommendations.

As discussed in the report, going back over 20 years, there have been fundamental shortcomings in the CPSC's Human Capital Program. These shortcomings have, and continue to have, negative impacts on agency operations. Many of the findings and recommendations found in our assessment were identified in OPM evaluations in 1998 and 2007 and never resolved. These findings include: the CPSC has not developed and implemented effective written policies regarding the human capital processes, the CPSC does not effectively communicate human capital policies to agency management, the CPSC does not take advantage of all available recruiting and retention flexibilities, and the CPSC's human capital decisions are not data driven.

The CPSC concurred with 33 of the 41 recommendations made to improve their human capital program and address the findings made in the report. This represents a positive development and hopefully is a first step in correcting the above referenced issues. We look forward to reviewing the corrective action plan required by OMB Circular A-50 and working with management to close these recommendations. When the CPSC implements these recommendations, it will greatly improve both the agency's human capital program and, consequently, the agency's ability to meet its mission.

The CPSC non-concurred with 8 of the 41 recommendations. These recommendations relate to the development and implementation of a human capital operating plan and a succession plan, improving the management of employee performance, and conducting annual self-audits of the human capital program. Non-concurring with recommendations related to these matters will not make the underlying problems these recommendations were designed to address go away. What will make a difference is acknowledging problems and implementing recommendations.

The following are recommendations with which the CPSC non-concurred and the OIG responses to the non-concurrence:

1. Create and publish an HCOP that conforms to current OPM guidance.

Although acknowledging the potential benefits of bringing their existing human capital operating plan into compliance with OPM guidance, agency management has indicated that they will not do so due to the "limited human capital resources currently available" and because they are not required to do so. As indicated in Appendix D of our assessment, the CPSC's human capital resources are comparable to those of their peers. Furthermore, when other



recommendations made in this report, such as better utilizing data in forming sound human capital strategies and developing and implementing written policies and procedures to govern human capital activities are implemented, the efficiencies gained thereby will free-up the human capital resources needed to make other improvements, such as bringing the human capital operating plan into conformance with OPM guidance.

As OPM has said,

Public and private sector studies have shown organizations that achieve and sustain excellence in strategic human capital management outperform those who do not. The strategic management of human capital not only impacts organizational performance but can enable the workforce to accelerate progress to achieve strategic objectives. How an agency manages human capital dramatically impacts performance.

OPM made a similar recommendation in 2008 when they recommended EXRM develop a strategic plan to address all the OPM human capital systems. They directed EXRM's attention to the help available through OMB's Center for Small Agencies and other resources.

In summary, although the CPSC is not legally required to complete a formal HCOP, based on the potential benefits of doing so and the number and severity of the other issues identified in this report, they should.

2. Align HCOP and other EXRM strategic planning documents with the agency's Strategic Plan.

See recommendation 3, below.

3. Align and demonstrate how HCOP objectives and actions reflect HCF system standards.

Agency management non-concurred with both recommendations 2 and 3 based on their view that they had taken adequate actions to meet the requirements in question. As expressed to agency management at the time of the initial assessment, the CPSC was unable to demonstrate that they had designed and implemented policies and procedures to accomplish the following:

- Define goals at the level of performance that should be achieved.
- Express goals in an objective, quantifiable, and measurable form.
- Plan and describe how the goals contribute or do not contribute to the objectives established in the strategic plan.
- Show how EXRM goals relate to federal government performance goals.

Further, as OPM noted in 2008, the CPSC has not established formal systems to assess and improve its human capital planning or instituted a formal monitoring plan to ensure human



capital decisions and activities are having the desired impact. At that time, OPM recommended the CPSC develop formal processes and systems to continually assess the impact of human capital planning.

15. Create and publish a succession plan and supporting documents that conform to current OPM guidance, to include backfill and reorganization plans, and a list of all Mission Critical Occupations.

See recommendation 16, below.

16. Require periodic reviews of all succession planning elements to foster continuous improvement.

Agency management non-concurred with both recommendations 15 and 16. Management non-concurred with the recommendation that they develop a succession plan despite acknowledging the “value of such documentation.” Management’s non-concurrences appear to be based on their view that they have taken adequate actions to meet the requirements in question. As expressed to agency management at the time of the initial assessment, the CPSC was unable to demonstrate they had designed and implemented an effective succession plan or the policies and procedures necessary to utilize the documents listed in their response to foster continuous improvement and to protect the agency from predictable events.

In addition, the approach discussed in the management response to “look at employee data/trends” using undefined quarterly and annual reports does not include a formal, measurable, or necessarily repeatable method to address the agency’s future staffing needs.

Once again, this issue was brought to management’s attention in 2008. OPM observed the CPSC had not identified skill gaps, nor identified or developed training and succession plans for all of its Mission Critical Occupations. At that time, OPM recommended the CPSC identify all Mission Critical Occupations and contact OPM for assistance.

33. Develop performance management measures for each job series using a 360-feedback mechanism and appropriate data to set targets to drive improvement.

Although acknowledging the potential benefits of using a 360-feedback mechanism and indicating they “may consider” using 360-feedback in the future, management non-concurred with this recommendation indicating they had determined no further action was needed. This assertion is undercut by the results of the 2022 FEVS. In 2022, nearly half (44.7%) of CPSC employees indicated that differences in employee performance were not recognized in a meaningful way. Management’s response did not address the portion of the recommendation relating to the use of data to set targets to drive improvement. As an aside, management’s response focused on a need for performance management software that included, “. . . digital



routing and connection to both FPPS and eOPF.” OPM offers USA Performance, a cloud based software solution for federal agencies, that manages individual employee performance and automatically interfaces with eOPF. The cost to the CPSC to introduce this easy-to-use tool would be approximately \$30,000 annually and likely represents a considerable savings to the agency when compared to management resources required by the current manual system. Those newly freed-up resources could then be redirected towards improving performance management and initiating a 360-feedback mechanism.

37. Develop a guide for evaluating the CPSC’s implementation of its HCF against best practices. This guide should include the following topics: technology solutions, resources, talent management, diversity of thought, risks, and collaborative efforts to improve operating efficiencies.

Although acknowledging the potential benefits of implementing the recommended actions ensuring that the CPSC’s human capital program is aligned with best practices, agency management indicated they will not do so because they are not required to do so and have “limited human capital resources currently available.” As indicated in Appendix D of our assessment, the CPSC’s human capital resources are comparable to those of their peers. Furthermore, when other recommendations made in this report are implemented, the efficiencies gained thereby will free-up the human capital resources needed to make other improvements, such as bringing the CPSC’s implementation of its HCF into compliance with best practices. While developing a guide for evaluating the CPSC’s implementation of its human capital processes against best practices may not be explicitly required by law, implementing best practices are a proven way of developing highly effective processes and improving programs.

38. Complete annual self-audits as required by OPM guidance.

Both OPM and the Government Accountability Office (see *Human Capital: A Self-Assessment Checklist for Agency Leaders*) view self-audits as an integral part of a high functioning human capital program:

If high performance and accountability depend on the three enablers—people, process, and technology—then it is useful, first and foremost, for any agency to have a clear and fact-based understanding of its human capital situation . . . Federal agencies that seek to comply with the spirit of performance-based management should scan their human capital systems to see if these elements have been addressed.

Acknowledging that “conceptually self-audits have great value,” agency management has indicated that they will not utilize self-audits because they are not required to do so. Management’s non-concurrence outlines several audits that EXRM is required to participate in, however, none of these audits address all of the requirements outlined by OPM for self-audits.



Appendix I: Management Response

Management provided a response to the report. A copy of the response begins on the next page.



Memorandum

TO: Christopher Dentel
Inspector General
Office of the Inspector General

DATE: March 16, 2023

THROUGH: DeWane Ray
Deputy Executive Director
Office of the Executive Director

Digitally signed by JERRY RAY
Date: 2023.03.16 14:47:49 -04'00'

FROM: Donna Simpson DONNA
Director SIMPSON
Office of Human Resources Management

Digitally signed by DONNA SIMPSON
Date: 2023.03.16 14:42:17 -04'00'

SUBJECT: Management Response to Human Capital Program Assessment Draft Report

The following constitutes a management response (amended) to each of the recommendations in the Human Capital Program Assessment draft report (amended) that was provided to management on December 12, 2022.

Appendix G: Consolidated List of Recommendations

General:

Management agrees that many of the recommendations that AE Strategies put forward are good Strategic Human Capital Management practices. However, small agencies, like CPSC, are not in a position to address all the elements of Office of Personnel Management (OPM) Human Capital framework (HCF) (outlined in 5 CFR 250.203) and are therefore excluded from the specific requirements of 5 CFR 250.201-209. We, in fact, are not resourced to meet those requirements. When addressing how we will address and implement our strategic human capital programs and the OPM guidance in the HCF, we must consider our specific, unique human capital needs, the resources available to implement programs and ensure adherence to merit system principles, laws, and regulations.

There are some very broad generalizations contained in the report with few details on what exactly was found or how a specific recommendation might be implemented. To fully address AE Strategies recommendations, the Office of Human Resources Management (EXRM) would need more information to better understand what circumstances specifically precipitated the recommendation to

determine if an action is needed or what concrete steps might be needed to address the recommendation.

Management discussed strategies and best practices for human capital programs for small agencies with OPM during OPM's human capital evaluation of CPSC conducted in December 2022. Since human capital strategies and requirements have changed significantly since the agency's last two audits referenced in this report, we are eager to see the new OPM report and work to ensure that OPM's concerns are addressed. During the evaluation outbrief, OPM provided notice of several recommendations that will be included in the evaluation report. Management's plan to address those specific recommendations are included (as appropriate) in the responses below.

1. Create and publish an HCOP that conforms to current OPM guidance.

Nonconcur. As CPSC is not required to have a separate Human Capital Operating Plan, (HCOP) because CPSC is not a CHCO/CFO Act agency under 5 CFR 250, the agency is not required to create a publish an HCOP or conform to current OPM guidance. However, CPSC chose to develop and establish a HCOP aligned with the Commission approved CPSC Strategic Plan (2018-2022), which covered the period of AE Strategies assessment. The plan was developed for the purpose of ensuring EXRM had the level of detail necessary to adequately address the Commission specified strategic objectives, performance measures, and priorities. During the course of developing the HCOP it was concluded that the *Strategic Goal 1: Workforce* and the operating plan process provided more than adequate detail to ensure that EXRM goals, measures, and priorities were clearly defined and that the budget process allowed flexibility (through the Commission approved Operating Plan) to adjust priorities on an annual basis to address President's Management Agenda (PMA) items, OPM initiatives, agency initiatives, and other mandates through the four (4) identified strategic objectives: (1) enhance effective strategic human capital and alignment; (2) Foster a culture of continuous development; (3) Attract and recruit a talented and diverse workforce; and (4) Increase employee engagement. The agency annual budget process also provides on an ongoing basis the opportunity for formal communication of these goals, measures, and results to both internal and external stakeholders.

While there may be additional benefits of a HCOP which specifically conforms with current OPM guidance, with the limited human capital resources currently available, EXRM must focus on the activities necessary to fulfil the EXRM requirements associated with the Strategic Plan and Operating Plan, in addition to other activities required by federal statutes or policies and are vital to assuring the smooth operation of an agency human resources organization, such as, measures, data calls, and verification/validation processes. With the approval of a new Strategic Plan (2023-26) Management will re-evaluate the need for an updated HCOP, but in the meantime, management considers the intent of this recommendation to be fulfilled.

2. Align HCOP and other EXRM strategic planning documents with the agency's Strategic Plan.

Nonconcur. Because CPSC is not a CHCO/CFO Act agency under 5 CFR 250, the agency is not required to align HCOP or conform to current OPM guidance, however, the HCOP in effect at the time of this assessment was directly aligned with the CPSC Strategic Plan. For the assessment period, Goal 1 of the Agency's Strategic Plan was WORKFORCE. The four (4) strategic objectives,

(1) enhance effective strategic human capital and alignment; (2) Foster a culture of continuous development; (3) Attract and recruit a talented and diverse workforce; and (4) Increase employee engagement, under “Workforce” carry into the Operating Plan objectives and all of the performance measures, milestones and priorities associated with the objectives. The Operating Plan included 35 different measures or milestones for evaluating the Workforce objectives and ensuring initiatives in the areas of focus were being achieved. Management has determined that no further action is needed regarding this recommendation.

3. Align and demonstrate how HCOP objectives and actions reflect HCF system standards.

Nonconcur. The HCOP’s four (4) strategic objectives were: (1) enhance effective strategic human capital and alignment; (2) Foster a culture of continuous development; (3) Attract and recruit a talented and diverse workforce; and (4) Increase employee engagement. These objectives directly reflect the HCF system standards for strategic planning and alignment (reflected in strategic objective #1), talent management (reflected in strategic objective #2 and 3), and performance management (reflected in strategic objective #4). Evaluation is reflected across all objectives. Management has determined that no further action is needed regarding this recommendation.

4. Design and implement agency policies which describe how the use of data will support sound HC strategies and identify process improvements. This should include a process to identify deficiencies and a plan for remediation.

Concur in this recommendation and management considers it fulfilled. The agency’s policies regarding the use of data to improve HC strategies and process improvements (during the assessment period) are outlined in the key measures, operating measures, and milestones of the agency’s operating plans and included training supervisors on position management, improving human resources tracking and reporting, using data for workforce planning, succession planning and knowledge transfer. Goals met in reporting period include:

- Managers trained and given access to human capital reporting system,
- Managers trained on project reporting system,
- Quarterly reports developed and disseminated to all agency supervisors and managers,
- Annual reports developed and disseminated to all agency supervisors and managers, and
- Position allocation approval process updated and implemented.

These data points are used to identify and create remediation plans where necessary.

5. Establish formal communication strategies with all appropriate agency stakeholders (messages, briefings, policies etc.).

Concur in this recommendation and management considers it fulfilled.. While the term “formal communication strategies” is undefined in the Human Capital Program Assessment provided by AE Strategies, CPSC’s budgeting process includes formal communication channels with all internal management stakeholders on a regular basis. For example, included in the development of the Strategic Plan, Operating Plan, quarterly reporting, Strategic Data Review meetings, and annual agency reporting and verification/validation process, EXRM may formally communicate regarding office activities and policies through both verbal and written means throughout the discussion, clearance, and publishing phases of the development of these critical agency operational and policy

documents. The related reports are available internally and externally.

6. Publish all policy documents to appropriate staff.

Concur in this recommendation and management considers it fulfilled. While the scope of the term “all policy documents” is undefined in the Human Capital Program Assessment provided by AE Strategies, EXRM’s Directives, the collective bargaining agreement (CBA) and other EXRM guidance and information are all published and thus available on to all CPSC staff on the CPSC SharePoint EXRM site.

7. Establish communication channels with appropriate offices as well as establish a feedback mechanism regarding diversity, equity, and inclusion.

Concur in this recommendation and management considers it fulfilled. While neither of the terms “communication channels” or “appropriate offices” with respect to feedback mechanism regarding diversity, equity, and inclusion (DEI) work is defined in the Human Capital Program Assessment provided by AE Strategies, EXRM takes very seriously the agency’s commitment to furthering the agency’s efforts to advance DEI goals, both internally and externally. The agency has a general feedback mechanism available through the Chief Diversity Officer and the Office of EEO, Diversity & Inclusion. The agency also utilizes the annual Federal Employee Viewpoint Survey (FEVS) which has questions specific to diversity, equity, and inclusion as well as the overall DEIA Index and the Index for each element: Diversity, Equity, Inclusion and Accessibility (DEIA). CPSC’s results in each of these categories exceeded government-wide results. The results from FEVS are provided to every CPSC employee via email and are made available on the agency website. The annual MD715 report with agency DEI information is disseminated to all employees and available on our website. These reports serve as communication channels for all employees and all offices and are then used to inform our DEIA initiatives. Additional avenues for feedback will be reviewed for potential use as the agency DEIA plan continues to be implemented. Part of this process has included the creation of the DEI Council which provides 360- degree feedback opportunity for agency management and employees regarding these important activities.

8. Reviewed and approved annually, and updated as needed all human capital policies, e.g., HCOP, Human Capital Policy, and Delegated Examining Policy.

Management generally concurs with this recommendation and agrees to action, as stated below.

OPM sets all Delegated Examining Policy for federal agencies. CPSC’s delegated agreement with OPM is dated 2010 which is the last time major components of DE were updated by OPM. The agreement is automatically renewed each fiscal year. CPSC utilizes the OPM DE Handbook for all policy for hiring under DE authority.

CPSC’s Operating Goals for Human Capital are updated annually under the CPSC Operating Plan process.

Other human resources policies covered under this should be reviewed every 5 years or sooner, if required by new law, rule, or regulation as outlined in CPSC Order 0100, Directive on Directives and Delegations of Authority. EXRM will commit to a review of its current directives after we are staffed at our full FTE level in FY23 for any Directive not dated within the last 5 years.

9. Beginning with HCOP objectives, develop a clear feedback loop regarding policy implementation between EXRM and senior management on a regular basis, preferably at least quarterly.

Concur in this recommendation and management considers it fulfilled. CPSC conducts Strategic Data Review (SDR) meetings with its Senior Management team, on a regular basis. During the SDR meetings, the status of all of the Operating Plan performance objectives is reviewed. This meeting provides the opportunity for EXRM to provide feedback to Senior Management regarding the organization's progress towards implementing these annual policy and performance objectives.

Additionally, quarterly results are available on CPSC's internal SharePoint site for every key measure, operating measure, and milestone. These results are keyed to both the performance budget and report raw data. All senior managers are notified as to the availability of this information via email. Thus, when the quarterly report is posted, senior management, who all have access to this site, can review the information and provide feedback at a time and place of their convenience. Also, EXRM and OEX meet weekly to discuss HC issues and ongoing initiatives.

10. Assess the impact of HC policies, programs, strategic goals, and initiatives on organizational performance, and develop and hold staff accountable to meet milestones designed to implement new policies, programs, and initiatives.

Concur in this recommendation and management considers it fulfilled. While the referenced "new policies, programs, and initiatives" are undefined in the Human Capital Program Assessment provided by AE Strategies, this recommendation is considered fulfilled through, among other practices, the Strategic Data Review (SDR) meetings with its Senior Management team, on a regular (usually quarterly) basis. During the SDR meetings, the status of all of the Operating Plan performance objectives is reviewed. Further, the agency's required Program Support performance element for all employee performance appraisals ensures accountability for HR staff on the milestones on new policies, programs, and initiatives in the Operating Plan. EXRM's success in meeting these milestones is tracked via the Agency Performance Database quarterly. With respect to specific "programs, policies, and initiatives" each can be specific and varied in terms of the means of assessment and thus do not always lend themselves to a one-size-fits-all approach for review. For example, the most recently completed telework policy was developed with extensive management and employee input including a working group, surveys, Union collaboration, federal agency best practices, OPM review, etc. On the other hand, the new parental leave policy was developed utilizing OPM guidance, coordinated with payroll, reviewed by the Union, and communicated to all employees to implement quickly and efficiently and meet the required timeframe.

11. Implement and report to agency senior management on measures of the effectiveness of new policies, programs, and initiatives.

Concur in this recommendation and management considers it fulfilled. While the referenced "new policies, programs, and initiatives" are undefined in the Human Capital Program Assessment provided by AE Strategies, this recommendation is considered fulfilled through, among other practices, the above referenced Strategic Data Review (SDR) meetings with the agency Senior Management team, on a regular basis. During the SDR meetings, the status of all of the

Operating Plan performance objectives is reviewed. For example, the telework policy was developed with extensive management and employee input including a working group, surveys, federal agency best practices, OPM review, etc. Other initiatives are reported on annually. For example, the results of the Federal Employee Viewpoint Survey, the performance management review, or the Delegated Examining (DE) audit. Other programs may be reviewed on a different basis, such as biennially (SES performance system) or every 5 years (OPM HC assessment). Finally, EXRM meets with OEX weekly to provide regular updates on all ongoing initiatives.

12. Develop key performance measures that reflect the effectiveness of EXRM's support of the CPSC's mission.

Concur in this recommendation and management considers it fulfilled. Specific key performance measures tied directly to the Strategic Plan are part of the Commission approved annual Operating Plan, annual Congressional Budget Justification request, and the recently approved four year (2023-26) Strategic Plan. The initiatives and the associated performance measures are tied directly to the support of CPSC's mission. Below is an excerpt from the 2018-2022 Strategic Plan that details the link between the workforce goal and mission. All performance measures are directly aligned and linked to one of the four objectives:

Strategic Goal Overview

Having a highly trained, diverse, and engaged workforce is critical to meeting the dynamic challenges of the consumer product safety landscape and achieving the CPSC's life-saving mission. Agency staff's knowledge about product safety, commitment to the agency's mission, and "can-do" attitude make achieving the CPSC mission possible. Cultivating the most effective safety workforce is the first strategic goal because people enable the accomplishment of all other goals, objectives, and initiatives. The CPSC plans to recruit and retain a talented and diverse staff, train current staff so that skills and competencies are aligned with evolving needs and develop policies and programs to create an engaged and top-performing workforce. To accomplish this goal, the CPSC needs staff with a wide range of specialized and support skills, and with the education, expertise, and potential to effectively fulfill the full depth and breadth of agency responsibilities. This includes technical experts in law, science and engineering, health sciences, child health and development, safety inspection and enforcement, communications, statistics, information technology, data analysis, financial management, facilities management, and program analysis, among other disciplines. The CPSC will ensure that the agency's performance management system is effectively used to manage employee performance and that performance expectations are aligned to the agency's mission, appropriately rigorous, and effectively communicated. The CPSC will support managers through training and provide the tools and support they need to manage performance effectively to achieve high quality results.

This Strategic Plan was formulated to address the following key workforce challenges:

- Having a workforce with the knowledge, skills, and abilities to meet new, innovative, and emerging product safety challenges;
- Aligning personnel resources to agency priorities;
- Maintaining a global presence to address global marketplace issues;
- Increasing employee engagement; and
- Strengthening knowledge transfer through succession planning.

The CPSC's approach to cultivating an effective workforce involves enhancing human capital planning and alignment, increasing opportunities for professional development, and improving recruitment strategies to attract talented, diverse, and committed staff. The strategy also emphasizes increasing employee engagement by promoting and rewarding staff innovation and creativity, increasing managers' commitment to fostering employee engagement in the workplace, and promoting a healthy work-life balance.

The key performance measures for the 4 strategic objectives are:

Strategic Objective 1.1: Enhance effective strategic human capital planning and alignment

KM1.1.02 Percentage of full-time equivalents (FTEs) utilized

Strategic Objective 1.2: Foster a culture of continuous development

KM1.2.01 Percentage of employees satisfied with opportunities to improve their skills (as reported in the Federal Employee Viewpoint Survey)

Strategic Objective 1.3: Attract and recruit a talented and diverse workforce

KM1.3.01 Percentage of hiring managers trained on recruitment

Strategic Objective 1.4: Increase employee engagement

KM1.4.01 High-performing Federal Workforce - Employee Engagement Index Score

Each objective also has operating measures, milestones and priorities outlined in the Operating Plan each fiscal year. Management has determined that no further action is needed regarding this recommendation.

13. Use data developed in the new performance measures to correct any deficiencies and improve HC policies and programs.

Concur in this recommendation and management considers it fulfilled. While which referenced "new performance measures" are undefined in the Human Capital Program Assessment provided by AE Strategies, data is utilized to develop plans, new measures or initiatives and make process improvements as necessary with respect to HC policies and programs. For example, if a deficiency is identified in the DE review, EXRM implements an updated or new procedure to correct the issue. For example, vacancy announcement language was revised to clarify veteran's preference eligibility after a recent review. Data is utilized to ensure performance measures can be adequately measured, are quantifiable and can be verified. If a measure is not met or is in danger of not being met during the FY, management is notified at the Strategic Data Review meetings. The relevant offices will work with Senior Management to develop strategies to assist in meeting the measure. In the circumstance when it appears measures will not be met, data and consultation with Senior Management leads to developing strategies to meet the measure in the following reporting period or adjust the measure to reflect available resources. Also, measures and milestones are reviewed and updated, deleted, and added several times throughout a year – agency budget request to OMB, budget request and justification to Congress, and Commission review and approval of the Operating Plan.

14. Update and publish directives and SOPs for all major HC areas and routine HC tasks.

Management generally concurs with this recommendation and agrees to action as stated below.

All HR policy documents required by 5 CFR are included in directive and/or SOP (internal guidance) form (See Directives Series 0900 and 1000). As discussed with OPM in the Evaluation outbrief, EXRM will update its Excepted Service – Veteran’s Preference Process internal SOP in the next 60 days as well as update its Merit Promotion Plan (CPSC Order 1025.1 in FY23. EXRM Directives/SOPs will be reviewed and updated or marked current (within 5 years) as appropriate when EXRM is fully staffed in FY23.

15. Create and publish a succession plan and supporting documents that conform to current OPM guidance, to include backfill and reorganization plans, and a list of all Mission Critical Occupations.

Nonconcur. EXRM utilizes staffing, reorganization, or succession plans according to agency needs, when developing future operating plans and implementing the new strategic plan. EXRM currently utilizes a list of mission critical occupations for all agency reporting. While management recognizes the value of such documentation for Departments and Agencies with sufficiently sized HR offices to provide the capacity for such exercises, and the requirement for those agencies which are subject to 5 CFR 250, CPSC meets neither of those criteria. Accordingly, management has determined that no further action is needed regarding this recommendation.

16. Require periodic reviews of all succession planning elements to foster continuous improvement.

Nonconcur. EXRM utilizes quarterly and annual reports in conjunction with the Operating Plan to look at employee data/trends and update workforce planning elements as necessary. While management recognizes the value of such documentation for Departments and Agencies with sufficiently sized HR offices to provide the capacity for such exercises, and the requirement for those agencies which are subject to 5 CFR 250, CPSC meets neither of those criteria. Accordingly, management has determined that no further action is needed regarding this recommendation.

17. Create and publish a policy document documenting steps to increase diversity outreach when hiring new employees.

Concur in this recommendation and management considers it fulfilled. Recruitment and outreach are a major component of the agency’s new DEIA plan. The plan included recruiting for a HR Specialist specializing in recruitment and outreach and we have onboarded a Diversity & Inclusion Program Specialist in the EEO. Outreach protocols will be developed as part of their initial work to increase recruitment outreach for diversity. Other initiatives under the plan are: developing relationships with disability employment organizations, increasing utilization of special hiring authorities, and developing methods to evaluate effectiveness of targeted recruiting efforts. The plan also includes training for selecting officials on unconscious bias in hiring (completed December 2022). For the assessment period, there were two performance goals (listserv touches for recruitment and recruitment outreach activities) as well as two milestones (use of recruitment video for outreach and annual plan for career fairs developed and implemented) for diversity which targets were met or exceeded. EXRM and EEO will follow-up with appropriate action based on specialist recommendations and current and future DEIA plan initiatives.

18. Identify and manage ongoing relationships with recruiting and outreach sources.

Concur in this recommendation and management considers it fulfilled. EXRM and EEO, Diversity and Inclusion have ongoing relationships with outreach sources and this outreach was part of two performance goals (listserv touches for recruitment and recruitment outreach activities) as well as two milestones (use of recruitment video for outreach and annual plan for career fairs developed and implemented) which targets were met or exceeded.

Examples of outreach relationships include: University of MD engineering intern-for-a-day and Engineering Career Fair Day, Handshake (recent graduate outreach), Worcester Polytech Institute Student Project Experience, LinkedIn, Indeed, and the Workforce Recruitment Program. The Agency DEIA Plan includes initiatives for developing relationships with disability employment organizations and increasing utilization of special hiring authorities. With the addition of 2 Specialist positions (one in EEO and one in EXRM) – this task will be managed by the 2 new employees EXRM and EEO will follow-up with appropriate action based on specialist recommendations and the DEIA plan initiatives.

19. Implement steps to address the federal government-wide priorities identified in the Federal Workforce Priorities Report.

Concur in this recommendation and management considers it fulfilled. While not all of the priorities referenced above apply to non CFO Act agencies such as the CPSC, CPSC incorporates the government-wide priorities in the Operating Plan as appropriate and as resources allow. All applicable items in the PMA outlined in the Federal Workforce Priorities Report specifically were added to the priorities section or cross-cutting section and accomplished and reported on as necessary to OPM, OMB, and Congress. In FY21 and FY22, the performance management training for employees and supervisors was added to the Operating Plan as required by the PMA with a goal of 80% employee and managers trained. The agency exceeded the goal with 100% trained in FY22.

20. Identify the CPSC-specific skill and competency gaps and establish a process to close those gaps.

Concur in this recommendation and management considers it fulfilled. CPSC will complete our biennial employee development survey in FY23 to identify skill gaps and needed across the board training for employees. This will include a separate survey for managers to identify core and technical competencies that have gaps. All employees who are not at their full performance level are required to have a current Individual Development Plan (IDP) which identifies necessary competencies and development activities for any gaps. The survey will inform the agency training plan, IDP development and organizational training plans.

21. Develop initiatives through Strategic Workforce Plans.

Concur in this recommendation and management considers it fulfilled. The agency does not have separate and distinct strategic workforce plans from the other strategic planning documents described here. Staffing levels and agency resources and projects are determined in the

Commission approved Operating Plan not separately by EXRM.

Therefore, positions are managed closely, and all positions filled are in alignment with the agency's plan. Organizations are provided their full-time equivalent (FTE) level and in order to staff based on their needs and internal plan in alignment with the performance budget and the approved agency operating plan.

Organizations complete a formal staffing plan for review and approval as part of the Operating Plan planning process in the circumstances where additional funding becomes available for added staffing in a given fiscal year. For example, summer intern requests require a narrative justification request and are approved at the agency level.

22. Develop and implement an annual assessment and review process of the Mission Critical Operations plan.

Concur. Management is currently developing a formal Continuity of Operations Plan which was completed this fiscal year.

23. Develop and implement a process to report turnover data by office to senior agency management at least annually. This process should include feedback between EXRM, senior agency management, and staff in the affected offices.

Concur in this recommendation and management considers it fulfilled. The CPSC regularly (including quarterly and annually) reports turnover data by office to Senior Agency Management. These workforce reports are distributed to all managers and supervisors and for FY23 the report is being distributed to employees as well. EXRM also compiles an exit survey report and provide to OEX and EEO annually. EXRM also provides a weekly staffing report that tracks information on accessions and departures as well as agency FTE levels.

24. Review policy and programs that directly relate to recruitment and retention such as: retention bonuses, flexible pay bands for hard-to-fill positions, career ladder positions, cross-training, easier hiring processes, and other flexibilities at HR's disposal to recruit and retain qualified employees.

Management generally concurs with this recommendation and agrees to action as stated below. EXRM is continually assessing policy and procedures and looking for best practices in the areas of hiring flexibilities, recruitment incentive programs and development programs. EXRM has policies in place for recruitment and retention incentives, hiring authorities, and career ladder positions. We utilize all applicable programs and authorities at our disposal within our budget. Over the last few years CPSC has utilized recruitment incentives such as: superior qualifications, recruitment/relocation bonuses, and annual leave service credit. The agency has also utilized the full range of hiring authorities for maximum flexibility in filling our hard-to-fill positions including: direct hire, Pathways Recent Graduate, Veteran's Recruitment Appointment, and Excepted Service. Annual reports are completed and submitted to OPM as required. As stated in response #8 and #14, once fully staffed, EXRM will review/update all SOPs and Directives as required by CPSC Directives policy.

25. Develop and implement policies and procedures to meet the agency-specific diversity

and inclusion requirements of Executive Orders 13583 and 14035.

Concur in this recommendation and management considers it fulfilled. Despite neither of these Executive Orders specifically applying to the agency, CPSC has chosen to pursue the intended goals of both documents. The agency has developed plans as listed in the Executive Orders and will implement these plans in accordance with the goals of the EOs, PMA and the agency Operating Plan. The agency's Equity Action Plan which was published in response to EO 13583 can be found on CPSC's website at: [CPSC Equity Action Plan | CPSC.gov](https://www.cpsc.gov/Equity-Action-Plan). The agency's Equity Action Plan lays out challenges and barriers to achieving more equitable public health outcomes with respect to product safety. The plan details steps the agency has already taken, and will take in the future, to address the identified barriers. The work outlined in CPSC's Equity Action Plan includes: efforts to improve the quality of data about injuries in part by hiring new staff with expertise in underserved communities; consumer product safety standards development (both voluntary and mandatory) to prevent hazards; new, demographically informed, targeted product safety enforcement and investigation actions; outreach to impacted communities to communicate product safety hazards, deliver safety education campaigns, and gather information, feedback, and new research to learn more about the product safety-related challenges faced by underserved communities.

In May 2022, CPSC held a public forum for an equity plan roundtable discussion to discuss steps the agency can take to better address existing racial disparities in injury rates and deaths caused by certain consumer products. The CPSC Equity Action Plan Roundtable also focused on best practices to learn from, and communicate with, underserved communities regarding product safety hazards. The agency's DEIA plan was developed and approved as described in EO 14035. The plan was submitted to OMB and now has been distributed to all employees and posted on the agency website. The plan includes recruiting for a HR Specialist specializing in recruitment and outreach (completed). The agency also recently onboarded a Diversity & Inclusion Program Specialist in the EEO. Other initiatives under the plan are: creating a Diversity Council, ensuring that all technology is compliant with Section 508 of the Rehabilitation Act, whether produced in-house or by a third party, developing relationships with disability employment organizations, increasing utilization of special hiring authorities, and developing methods to evaluate effectiveness of targeted recruiting efforts. The plan also includes training for selecting officials on unconscious bias in hiring (completed December 2022).

26. Publish formal policies and procedures governing performance management within the CPSC.

Concur in this recommendation and management considers it fulfilled. The agency performance management directive (CPSC Order 1022.1) and collective bargaining agreement (CBA) address policy and procedures for performance management and are available to all employees on CPSC's SharePoint site. All rating officials and all employees are provided with information via email and the EXRM newsletter during the rating cycle (progress reviews, end of cycle, setting up a plan) which informs them of the policies and procedures which govern performance management at CPSC.

27. Create and distribute a survey to all employees regarding employee satisfaction with work

life balance initiatives and publish the results. Repeat this process at least annually.

Concur in this recommendation and management considers it fulfilled. The annual FEVS includes work life balance questions that measure satisfaction with programs with results posted internally and externally. In the most recent version of the FEVS these was question 61 and 33as well as questions on telework and reentry (Q91-99). The results from the FEVS survey are provided to all employees. In addition, we have conducted surveys on telework. Work life balance information is also on the EXRM SharePoint site, EXRM newsletter, and updates and other information is provided periodically via email. These results are provided to Senior Management to review and act as needed.

28. Present and implement a plan to address employee concerns voiced in the survey.

Concur in this recommendation and management considers it fulfilled.. See #27 response.

29. At the end of each EXRM-provided training, provide employees with the option to provide feedback on the utility of each training provided.

Concur in this recommendation and management considers it fulfilled. EXRM provides a feedback survey via email to all participants of agency training sessions conducted by EXRM. The survey results are utilized by EXRM to assess the course content and the effectiveness of the trainer to improve the delivery of training. In FY23, we plan to utilize FedTalent to deliver the feedback survey to employees for training courses that utilize the FedTalent registration process. This automated feedback mechanism will allow for more efficient collection of information and reporting of the results.

30. Create and distribute a survey to all employees regarding effectiveness and employee satisfaction with the employee awards program and each office's bonus pool and publish the results. Repeat this process biennially.

Concur in this recommendation and management considers it fulfilled. The FEVS contains questions regarding performance and incentive satisfaction. This year, they were questions 16 and 75 (as well as Q20, 53 and 54 on job performance) CPSC had a positive response rate for Q16 of 45% (compared to government-wide of 42%) and for Q75, the positive response rate was 62% (compared to government-wide 61%). After receiving a lower positive response rate in 2017, the agency responded by creating an EEI action plan in 2018. As part of the plan, we formed four (4) working groups, including one devoted exclusively to Awards & Incentives. As a result of this work, there were significant changes made at that time to the program. Awards have not been in the Bottom 20% response for the agency since that time and accordingly have not been a specific focus area for the agency's FEVS Action plan.

31. Create and distribute a survey to all employees regarding satisfaction with EXRM services, at least annually.

Management generally concurs with this recommendation and agrees to action as stated below.

The FEVS contains several questions regarding satisfaction with policies and specific HR programs, such as health/wellness, employee development, telework, performance management,

etc. This year, those questions included Q1, Q10, Q15, Q16, Q18, Q20 and Q90-99. In addition, CPSC participates in the OPM hiring management survey for selecting officials that measures satisfaction with the hiring process. EXRM will conduct a customer-based survey in FY23. EXRM is currently investigating options for implementing a customer service satisfaction survey, including a service specific, on-time survey which would go out with HR Specialist responses when providing an HR service or an all-employee survey. Based on the results of this survey, management will determine whether and how frequently to repeat the survey in future years.

32. Present and implement a plan to address employee concerns after each survey.

Management generally concurs with this recommendation and agrees to action as stated below.

Based on the type of survey conducted and the feedback received as described in #31, EXRM will provide results and a plan to address concerns raised for the survey in FY23.

33. Develop performance management measures for each job series using a 360-feedback mechanism and appropriate data to set targets to drive improvement.

Nonconcur. The agency's top-need with regard to performance management is a performance management system (PMS) solution with digital routing and connection to both FPPS and eOPF. As of this point the agency has been unsuccessful in identifying a solution that is cost-effective, connects with our current systems and meets the requirements of our PMS. Further, a 360-feedback mechanism is not something that applies to the majority of CPSC positions. Management recognizes the value of 360 feedback in some circumstances and utilizes such a mechanism where feasible and applicable (as described above in response to recommendation # 7). Accordingly, management may consider 360 feedback solutions as part of a future PMS solution, if applicable. Management has determined that no further action is needed regarding this recommendation.

34. Develop and implement HC assessment policies that align with OPM regulations and guidelines to include:

- how the CPSC evaluates its HR practices
- roles and responsibilities regarding required assessments
- allocation of available resources to support and implement assessments
- milestones and measures used to determine success in

assessments Concur as stated below.

EXRM will update the previous accountability system policy to formally document the assessments completed, and measures utilized. Any findings will be documented in a written report and addressed.

35. Utilize all available data sources in a targeted, data-driven manner to assess HC programs effectiveness and success. Follow-up on the results of assessments via formal written reports and hold personnel accountable to ensure the findings do not continue to occur in the future.

Concur. See #34 response.

36. Develop and implement a plan to align the assessment program outcomes to HCOP goals and initiatives, at least annually, to include a review of any corrective actions taken to resolve prior year issues. Report the results to agency senior management.

Concur. See #34 response.

37. Develop a guide for evaluating the CPSC's implementation of its HCF against best practices. This guide should include the following topics: technology solutions, resources, talent management, diversity of thought, risks, and collaborative efforts to improve operating efficiencies.

Nonconcur. While management recognizes the value of such documentation for Departments and Agencies with sufficiently sized HR offices to provide the capacity for such exercises, or in instances for which such documentation may be required by law, CPSC meets neither of those criteria. However, every CPSC HR program, policy and initiative is formulated using best practices, samples, templates, and shared information from OPM, Small Agency Council, OMB Small Agencies Group, OPM Forums, IBC Customer Groups, MAX information sharing, etc. EXRM surveys those groups, gathers sample materials, shares training resources and technology sources. Management has determined that no further action is needed regarding this recommendation.

38. Complete annual self-audits as required by OPM guidance.

Nonconcur. While management recognizes such audits may be a requirement for those agencies which are subject to 5 CFR 250, small agencies, such as CPSC do not fall under this requirement. At the same time, conceptually self-audits have great value, which is why annual self-audits are conducted for DEU, staffing, verification/validation, personnel/pay actions, awards, credit card, etc. EXRM also participates in the Financial audit, FISMA audit, payroll audit, DISA security audit, and audits through contracted systems. Management has determined that no further action is needed regarding this recommendation.

39. Initiate a communication plan and distribute this plan across the CPSC to all appropriate stakeholders. The plan should establish formal communication strategies with all appropriate agency stakeholders (messages, briefings, briefing notes, policies etc.).

Concur in this recommendation and management considers it fulfilled. . While the term "formal communication strategies" is undefined in the Human Capital Program Assessment provided by AE Strategies, in addition to the multiple formal means agency management communicates with managers, supervisors, employees, and applicants on human capital issues including: newsletters, emails, briefings, SharePoint site, external website, applicant intake system, in-person and virtual meetings, web-based training and in-person training, policy documents, there are informal opportunities for interacting with senior management.

40. Measure the effectiveness of the communication plan through surveys, website traffic, community of practice involvement, cross-agency initiatives, training, and other internal communications.

Concur. See #39 response. Further, some of the activities suggested by AE Strategies in the Human Capital Program Assessment are not measures of effectiveness but important HC

activities with which management agrees are vital to a successful HC program such as training and cross-agency initiatives.

41. Provide EXRM staff with appropriate training and resources to complete mandated annual self- assessments.

Concur. We currently have 3 staff certified in DE and work with another small agency to conduct our required annual audit. Our Human Capital Specialist will complete the new OPM Evaluator Training in FY23 (postponed OPM training from FY22). Additionally, the specialist regularly attends the OPM inter-agency meetings for evaluators.



For more information on this report please contact us at CPSC-OIG@cpsc.gov

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