



The Library of Congress  
*Office of the Inspector General*

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**Human Resources Services  
Office of Workforce Acquisitions**

*HRS has Made Strides in Improving  
Recruiting and Hiring, but Opportunities  
for Improvement Still Exist*

Final Audit Report No. 2009-PA-101  
November 2009



UNITED STATES GOVERNMENT

LIBRARY OF CONGRESS

**Memorandum**

*Office of the Inspector General*

**TO:** James H. Billington  
Librarian of Congress

November 30, 2009

**FROM:** Karl W. Schornagel  
Inspector General

A handwritten signature in black ink, appearing to read "Karl W. Schornagel".

**SUBJECT:** *HRS has Made Important Strides in Improving Recruiting and Hiring, but Opportunities for Improvement Still Exist*  
Audit Report No. 2009-PA-101

This transmits our final audit report on Human Resources Services' Workforce Acquisitions. The Executive Summary begins on page *i*, and complete findings and recommendations appear on pages 5 to 18. Human Resources Services' response is briefly summarized in the Executive Summary and in more detail after individual recommendations. Its complete response is included as appendix D.

Based on the written comments to the draft report, we consider all of our recommendations resolved with the exception of I.b. Please provide, within 30 calendar days, an action plan addressing implementation of the recommendations, including implementation dates, in accordance with LCR 211-6, Section 11.A.

We appreciate the cooperation and courtesies extended to us by HRS during this audit.

cc: Director, Human Resources Services  
Chief Operating Officer

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## ▶▶ EXECUTIVE SUMMARY

Human Resources Services (HRS) works with, and provides management strategies for, the Library's service and infrastructure units to plan for, obtain, and manage the human capital that the Library needs to fulfill its mission. The organization includes five offices: Strategic Planning and Automation, Workforce Acquisitions, Workforce Management, Workforce Performance and Development, and the Worklife Services Center.

This report provides the results of our audit of the recruiting and hiring activities performed by the Office of Workforce Acquisitions (WFA). The principal objectives of this audit were to determine whether 1) processes applicable to recruiting and hiring Library staff were efficient and effective and 2) internal controls for recruiting and hiring activities adequately assured timely, accurate, and high-quality services.

Overall, we concluded that the WFA Specialists provide timely and courteous service and some Specialists perform their duties extremely well. However, the hiring process is not as efficient and effective as possible because WFA has not fully implemented internal controls to adequately assure timely, accurate, and high quality services. Additionally, WFA has neither determined whether the Library's recruitment efforts are efficient and effective, nor designed the Library's career Web page to attract job seekers.

HRS should adopt a stronger oversight role for those WFA activities to ensure that the hiring process meets the needs of 1) the Library's various missions; 2) managers, who are responsible for filling positions with talented staff; and 3) job applicants, who deserve a timely, efficient, transparent, and merit-based hiring process. The following paragraphs provide summaries of significant issues we identified through our audit and key recommendations to improve the WFA's recruiting and hiring activities.

**Steps WFA Should Take to Further Improve the Hiring Process**—The hiring process effectively provides qualified candidates for Library employment and HRS has had success in reducing the time it takes the Library to hire a new employee. Still, the length of the Library's hiring process is nearly 30 days longer than the goal applicable to other federal

agencies. The additional time it takes to hire increases the likelihood that the best-qualified candidates will no longer be available, especially in the competitive IT field.

We believe the WFA can effectively reduce the time it takes the Library to hire a new employee by implementing stronger controls and oversight. We recommend that WFA 1) require its Staffing Specialists to consistently enter complete hiring data and periodically assess the extent to which goals are met for each hiring step and make needed adjustments; 2) reevaluate the process needed for each hiring step, with specific emphasis on eliminating non-value added steps; 3) ensure that Staffing Specialists are properly trained and knowledgeable about recruitment issues and the hiring process including hiring flexibilities; and 4) develop a "Satisfaction Survey" to determine managers' satisfaction levels with the hiring process and identify strategies for making process improvements.

**WFA Staff Performance is Not Adequately Measured—**

Performance appraisals of WFA staff are based neither on performance metrics nor accomplishments, because staff are not consistently entering complete data pertaining to their work into the employee data system, EmpowHR. As a result, the evaluations of staff performance are highly subjective. We recommend that the WFA Director require staff to consistently enter complete hiring data in EmpowHR and prepare performance appraisals which are based on actual metrics and staff accomplishments.

**Recruitment Efforts Need Strengthening—**WFA had neither determined whether the Library's recruitment efforts were efficient and effective, nor designed the Library's career Web page to attract job seekers. We recommend that WFA coordinate with the Library's Office of Opportunity, Inclusiveness and Compliance; begin tracking and analyzing recruiting and hiring data; and that HRS redesign the Library's career Web pages.

HRS generally concurred with our findings and recommendations. However, HRS management disagreed with our conclusion that the hiring process included non-value added steps. HRS purports that hiring delays are caused by the panel process rather than its staff.

## ▶▶ INTRODUCTION

One of the five strategic goals in the Library of Congress' Strategic Plan for 2008-2013 is to "cultivate a talented diverse community of innovators devoted to public service." The Office of Workforce Acquisitions (WFA) in the Library's Human Resources Services organization is responsible for recruiting and hiring qualified individuals.

During 2008, 230 people were hired to fill vacant Library positions. This report provides the results of an audit we performed to evaluate the efficiency and effectiveness of WFA's activities.

Although expedient and unbiased selections are the goals of the hiring process, as long as six months can pass from the time that a Library vacant position is advertised to the time that the position is filled. To be effective, the hiring process must be timely, efficient, transparent, and merit-based. The longer it takes to identify and select a candidate for a position, the greater the risk that the best-qualified applicants will lose interest.

In 2003 and 2005,<sup>1</sup> we reported that the WFA needed to improve its hiring process. We cited weaknesses in its collection of complete hiring data in the automated personnel system (LEADS), and the lack of substantive performance appraisals. Improvement is still needed in those areas. This report provides the results of our 2009 audit of the recruiting and hiring activities performed by the WFA.

Library of Congress Regulation 2010-14, *Merit Selection and Employment*, issued November 5, 2004, states in part that all Library vacancies (with some exceptions such as temporary positions) shall be posted and filled competitively in accordance with the procedures stated in the Library's Merit Selection Plan (MSP) (a flowchart of the hiring process is included in Appendix C). The MSP (revised January 8, 2009) includes objectives, policies, and procedures which provide a competitive process to select qualified individuals to fill vacancies and receive promotions.

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<sup>1</sup> *HRS Is Responding To Performance Challenges, But Additional Controls and Oversight Are Needed*, Report No. 2003-PA-101, September 2003 and *Review of the Library's Hiring Process*, Report No. 2005-AT-905 issued December 2005.

The WFA's Staffing Group primarily performs recruiting and hiring activities. Specialists and assistants in that group provide staffing, recruiting, and employment services, and work closely with the selection panels in the administration of the Library's Merit Selection and Employment Plans.

The selection panel consists of a Selecting Official (SO) and two Library staff members designated as Subject Matter Experts (SMEs). The panel performs a job analysis for the position (i.e., identifying the position's requirements in terms of knowledge, skills, and abilities (KSAs)), develops a questionnaire/crediting plan that establishes the criteria against which job applicants are scored and ranked based on their competency/KSAs; and conducts the job interviews. For each KSA, the panel prepares several options which describe in detail various levels of required experience and/or education. Two recent vacancies shown in Appendix B illustrate the KSA and options.

The Library uses an online automated hiring system – AVUE<sup>2</sup> – to screen applicants based on applicant-submitted questionnaires. Those questionnaires are scored based on the previously developed questionnaire/crediting plan. Staffing Specialists review questionnaire scoring tabulated by AVUE and provide an initial list of the top seven candidates (plus additional applicants if scores are tied) to the requesting SO for subsequent candidate interviews. Additional candidates may be identified for interviews at the SO's request.

To ensure that the Library has an efficient hiring process, HRS has initiated a human capital flexibilities working group to evaluate the applicability of new and best practices of federal agencies and appropriately implement them in the Library. Hiring flexibilities currently offered by the Library include recruiting and relocation incentives, student loan repayments, pay-setting (i.e., matching the candidate's current salary above the posted pay grade) and a tele-work program (i.e., work done outside of the traditional on-site work environment). HRS has also recently led an effort with the Library's service and infrastructure units to establish, measure, and monitor progress against established goals and targets.

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<sup>2</sup> Avue Technologies, Inc., a Tacoma, Washington-based software company, specializes in the delivery of human resources decision-support and process management automation tools for government agencies.

Additionally, HRS has approached Congress to identify ways that the Library could offer hiring flexibilities that are similar to the ones that executive branch agencies may offer. For example, HRS sought changes in the Library's senior level pay plan because it is not comparable to corresponding plans of the executive branch or private industry. In another example, HRS sought to implement an excepted service interchange agreement with executive branch agencies. This would allow Library employees who do not have competitive/career status to compete for federal competitive service positions. To date, Congress has not agreed to either of these changes.

To announce its job vacancies, the Library uses OPM's "USAJobs" Web site, as well as posting the position on the Library's Web site and in professional journals. Additionally, WFA and the Office of Opportunity, Inclusiveness and Compliance work in partnership to actively recruit talented and diverse staff for the Library by participating in job fairs, visiting organizations, and attending conferences.<sup>3</sup> The Library's intern and fellowship programs also provide effective paths for recruiting and developing interested job seekers.

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<sup>3</sup> These include the League of United Latin American Citizens, the National Association of Hispanic Federal Executives, the National Community for Latino Leadership, the Asian Pacific American Federal Career Advancement Summit, the National Urban League, and the National Congress of American Indians.



## ► OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives were to determine whether 1) the recruiting and hiring process was efficient and effective and 2) internal controls for recruiting and hiring activities adequately assured timely, accurate, and high quality services.

We interviewed WFA management and staff to acquire an understanding of the office's policies and procedures. We also surveyed a sample of SOs and new hires to assess their levels of satisfaction with WFA's services. To assess the timeliness of the hiring process we tested a sample of Vacancy Announcement Requests (VARs) that were received during fiscal year 2008.<sup>4</sup>

We contacted the Office of Personnel Management (OPM), Government Accountability Office (GAO), Government Printing Office, U.S. Department of Agriculture, and the Patent and Trademark Office to obtain their hiring metrics. We used that data as benchmarks in our assessment of the timeliness of the Library's hiring process. For the most part, executive branch agencies are using OPM's 80-day hiring model.<sup>5</sup> Although the OPM guidance does not apply to legislative branch agencies, including the Library, we believe that it represents best practices which the Library should adopt.

We conducted this performance audit intermittently from November 2008 through July 2009 in accordance with generally accepted government auditing standards and LCR 211-6, *Functions, Authority, and Responsibility of the Inspector General*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence we obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>4</sup> We randomly selected 125 VARs from a universe of 256 and analyzed the time interval for each step from receiving the VAR to selecting a candidate.

<sup>5</sup> In September 2008, OPM published the "End-to-End (E2E) Hiring Roadmap." The document established a methodology for effective hiring and set a goal of no more than 80 days to validate and fill a vacant position.

## ►► FINDINGS AND RECOMMENDATIONS

WFA provides oversight to the Library's hiring process. To attract and employ talented and highly educated staff, WFA must recruit and hire as expeditiously as possible. This requires that the office assess and re-evaluate its hiring process and continually consult with its stakeholders, the SOs, and SMEs.

On the whole, SOs expressed satisfaction with the Specialists' courtesy and timely service, and stated that some Specialists performed their duties extremely well. However, certain SOs expressed dissatisfaction with some Specialists' overall quality of service and knowledge of the recruiting/hiring process.

We determined that the hiring process is not as efficient and effective as possible because WFA has not fully implemented internal controls to adequately assure timely, accurate, and high quality services. We also determined that WFA had neither determined whether the Library's recruitment efforts were efficient and effective, nor designed the Library's career Web page to attract job seekers. WFA needs to adopt a more aggressive role toward reducing the time it takes to hire and assessing its recruitment and hiring efforts.

Specific findings and recommendations follow.

### **I. The WFA Should Improve the Hiring Process**

HRS has had success in reducing the time it takes the Library to hire a new employee. Still, the length of the Library's hiring process is nearly 30 days longer than the goal applicable to other federal agencies. The additional time it takes to hire increases the likelihood that the best-qualified candidates will no longer be available, especially in competitive fields. The length of the Library's process is partly attributable to the complexity of its Merit Selection Plan (MSP), which strives to ensure that hiring selections are unbiased. Nevertheless, the WFA can reduce the Library's 90-day standard to review applicants and make tentative job offers by:

- consistently collecting and analyzing time data pertaining to the hiring process to identify time-saving

- opportunities within the hiring steps and SOs that take longer than normal and may need additional training;
- providing the selection panel more flexibility in progressing with its selection process; and
- assuring its Specialists are fully knowledgeable about the process and are proactive in providing advice to SOs.

a. *WFA Needs to More Effectively Track and Assess the Time for Each Hiring Step*

To its credit, WFA has established goals for the hiring process as shown in Figure 1 below. However, it lacks complete data needed to effectively determine the time it takes to complete each hiring step and evaluate progress toward achieving its goals. Despite our December 2005 recommendation,<sup>6</sup> Staffing Specialists still are not fully inputting into EmpowerHR (WFA’s automated data system) the date each hiring step was completed. Moreover, WFA did not have written policies on the data that its Staffing Specialists should have been entering into the data system. We believe this contributes to the lengthy hiring process.

The Library’s 90-day standard to review applicants and make a tentative job offer illustrates the need for WFA to continually reevaluate its standards. OPM’s 18-day goal may be an overly optimistic and an impractical expectation for the Library in light of its complex MSP.

**Figure 1: Hiring Statistics**

Hiring Step	Assigned to	OPM Standard (Days)	Library Standard (Days)	Library Actual (Days)
Validating Need and Posting Announcement	SU/WFA	10	10	20
Opening and Closing Announcement	WFA	10	10	15
Reviewing and Ranking Applicants and Sending Referral List to the Selecting Official	WFA	16	10/7	8
Selecting Official and Panel reviewing applicants and making tentative job offer	SU	18	90	49
Preliminary Security Check	Personnel Security	10	5	5+*
Official Offer/ Accept	WFA	2	3	13
Entering on Duty	HRS	14	Varies	**
<b>Total Elapsed Time</b>		<b>80</b>	<b>128+</b>	<b>110+</b>

\* Estimated. Personnel Security does not track the time in takes to complete the security check.  
 \*\* Service Unit function not tracked by HRS.

However, our testing revealed that the 90-day standard is too long. The Library averaged about 49 days in 2008 for its selection panel process and 14 percent of the 2008 selections were completed by OPM’s 18-day goal. Given these facts, we

<sup>6</sup> Review of the Library’s Hiring Process, Memorandum Attestation Report No. 2005-AT-905 issued December 2005.

believe WFA should consider reducing the standard. However, WFA had to manually collect some of the needed data for our assessment. WFA management needs to ensure that its Specialists input into EmpowHR all dates in the process including the dates the selection panel process begins and ends.

There is room to improve the Library's times for other hiring steps. For example, we believe that the Library could easily reduce the average time it takes to post vacancy announcements as well as the average period in which its vacancy announcements are open to receive job applications. We note that in 2008, 25 percent of the Library's vacancy announcements were open longer than one month, which is much longer than the 10-day standard time periods established by either OPM or the Library. Again, WFA needs to continually monitor these times and take appropriate action.

*GAO's Standards for Internal Control in the Federal Government* directs government agencies to "[c]ompare actual performance to planned or expected results."<sup>7</sup> The collection of performance data would have provided WFA management meaningful information for identifying improvements for the Library's hiring process.

### **Recommendations**

We recommend that the WFA Director:

1. Require the Staffing Specialists and the Staffing Assistants to consistently enter complete hiring data into EmpowHR; and
2. Compare actual hiring data with planned results and periodically assess and adjust the time goals for each hiring step.

### **Management Response and OIG Comments**

HRS agreed with our recommendations, but notes in its response that the Library's 20-days cycle time for validating need and posting announcement (see figure 1) is "both

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<sup>7</sup> The U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, November 1999.

efficient and impressive.” We note that the Library does not meet its own standard of 10 days.

On pages 2-4 of its response, HRS continues its discussion of the statistics presented in figure 1. We wish to clarify that the statistics presented are merely intended to be illustrative, and allow readers to draw their own conclusions.

In light of the fact that the Library already exceeds the standards it has established, it should take this opportunity to reexamine and revalidate them.

*b. WFA Should Address Non-value-added Steps in the Hiring Process*

In general, there appear to be several non-value added steps in this process. Once the SME panel receives the initial referral list, it can choose to proceed to either a “narrative review,” an initial telephone interview on one or more of the critical KSAs, or in-person interviews. To illustrate the longest possible path the process could take (and possibly one taken by some panels because it ultimately reduces the number of applicants in the pool), a panel could choose to conduct a “narrative review.” In this scenario, the panel rates applicants on one or more critical KSAs. At the conclusion of the review, the panel must wait for a staffing specialist to become available in order to record the ratings. The waiting time and recording process is a non-value added step. In an improved process, the panel could simply move directly to the next step without waiting for a staffing specialist.

Following the narrative review, the panel may choose to conduct initial telephone interviews using one or more critical KSAs. Once more, the panel must wait for a staffing specialist to record scores, inserting yet more time into the process.

Following the telephone interviews, the panel can then conduct in-person interviews; however, these must be “structured interviews,” which means that the panel can ask only specific, pre-defined questions of the applicant. Before the panel can conduct a free-form interview, which would reveal important information about the candidate’s suitability for the position, the panel must once again wait for a staffing specialist to record interview scores. This inserts yet another waiting period into the process.

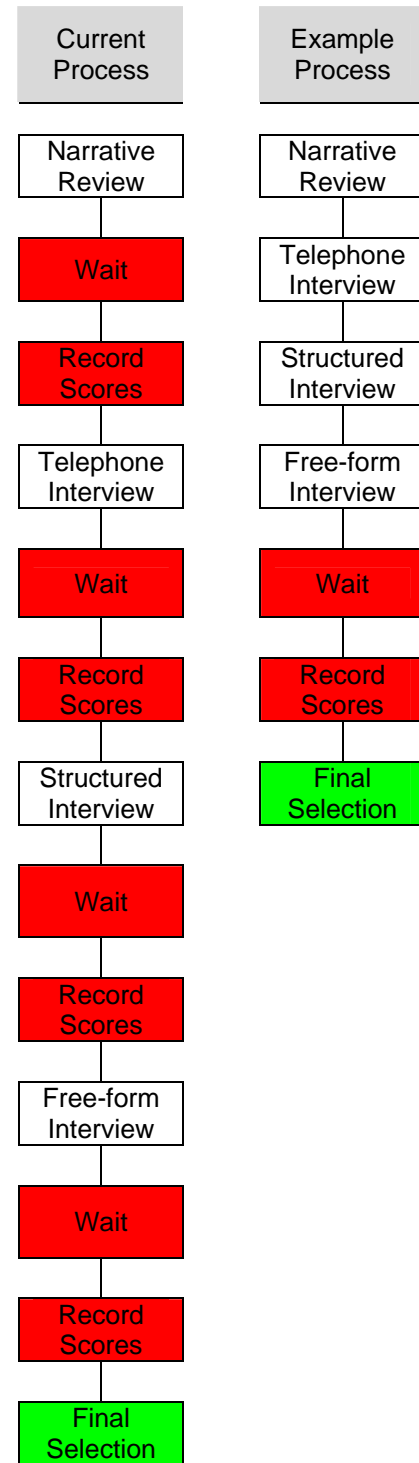


Figure 2: Value-stream map of current and proposed selection process.

All of the waiting time and time spent recording scores at each step is both non-value added (shown in red) and inserts delays into the process. The process could be much smoother if it were redesigned as shown in Figure 2. By eliminating three out of four wait times and score-recording steps, the panel could proceed directly from the narrative review to the final selection independently. The merit selection process would not be affected because properly trained panels would be able to resolve rating differences internally, without assistance from staffing specialists.

The reevaluation of the selection process is key to effecting needed changes in the Library's hiring structure. GAO's *Standards for Internal Control in the Federal Government* advocates that "[c]ontrol activities should be effective and efficient in accomplishing the agency's control objectives"<sup>8</sup> and its report on hiring stated "[a]gency managers need to be held accountable for maximizing the efficiency and effectiveness of their recruiting efforts and hiring processes."<sup>9</sup> WFA's establishment of a streamlined hiring process would provide a more effective and efficient hiring process.

### **Recommendation**

We recommend that the WFA Director reevaluate the process needed for each hiring step, with specific emphasis on eliminating non-value added steps.

### **Management Response and OIG Comments**

HRS did not concur with our finding and recommendation. HRS contends that the steps described as "non-value added steps" actually add significant value to the process by helping to "eliminate ... errors often found in the decision process" and are not the cause of undue delays.

First, we hope that "errors" are not "often found in the [Library's] decision process," and would like to give SME panels more credit for making a concerted effort to choose well-qualified candidates. Nonetheless, HRS asserts that group discussions can help eliminate these "errors." We

<sup>8</sup> The U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, November 1999.

<sup>9</sup> GAO, *Human Capital: Transforming Federal Recruiting and Hiring Efforts*, GAO-08-762T (Washington, D.C., May 8, 2008).

disagree. Group discussions are unlikely to eliminate hierarchical differences in SME panels. In the end, the SO's point of view is likely to carry the most weight, whether or not a staffing specialist facilitates the discussion. To think otherwise is unrealistic. Further, as staffing specialists are not technical experts in the field in which a candidate is being evaluated, they can contribute little, if any, substance to a discussion of qualifications, and should not be able to second-guess SME panel members.

HRS' best solution to the group dynamic issue it discusses in its response would be to offer training to SMEs in recognizing the proper way to conduct group discussions. Further, it could offer the assistance of staffing specialists as requested by panels to resolve differences.

Moreover, HRS cites the unavailability of panel members as the basis for delays. While we agree that it is often difficult to gather busy Library managers for multiple meetings, we believe that the simple solution to this problem is to change the process. It is clear that requiring panels to pause and reconvene at each step inserts undue delays into the process. A more efficient process would allow panel members to independently evaluate candidates and compare scores electronically without the need for meetings or discussions. In fact, independent ratings are more likely to be objective and unbiased than those resulting from group discussions. The unavailability of panel members would not be an issue if the process were reconfigured.

It stands to reason that allowing panels to share ratings without the need to pause at each step would shorten the process. HRS could still be involved as needed on an advisory, but not mandatory, basis.

*c. Staffing Specialists Need Training to Better Advise Clients*

The SOs we surveyed perceived that the WFA Staffing Specialists were not effectively consulting and advising them on how to 1) develop an effective recruitment plan,<sup>10</sup> including

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<sup>10</sup> A recruitment plan identifies areas and the extent of under-representation in the Library. It also provides internal and external sources for filling vacancies with qualified candidates inclusive of under-represented groups.

guidance on hiring incentives<sup>11</sup>, 2) write applicant questionnaire/crediting plans that effectively screen out less qualified applicants, 3) effectively use AVUE (the Library's automated hiring system), and 4) plan an efficient interview process, including telephone interviews and other time-savers we discussed above. Staffing Specialists are knowledgeable about the basic process of job analysis and recruitment, but some lack knowledge about flexibilities and alternative courses of action. As a whole, Staffing Specialists are unable to answer questions that fall outside a basic framework. Consequently, the hiring process can take longer than necessary.

Some SOs indicated that the Specialists never mentioned recruitment incentives or hiring flexibilities, and appeared untrained for offering professional assistance in creating a quality crediting plan. One SO commented that the Staffing Specialist often stated, "I am not the subject matter expert so I cannot give you guidance on this."

Staffing Specialists should be communicating with the SOs at the onset of the hiring process and continually advising them on process improvements. This will help eliminate redundancies during the interview process, better ensure that the Specialists consistently refer qualified candidates, and ultimately reduce the overall hiring time.

In particular, Staffing Specialists are not providing inexperienced SOs advice on how to develop and validate tests in conjunction with the self-assessment applicant questionnaire/crediting plan and on the workings of AVUE.

We believe these shortcomings directly contribute to the length of the hiring process. WFA could reduce the Library's 49-day average for the panel process by working more closely with selection panels earlier in the process. Doing so would make it possible to schedule candidate interviews as soon as WFA provides the panels with the lists that identify the best-qualified job candidates.

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<sup>11</sup> Hiring incentives/flexibilities include, among others, student loan repayments, pay-setting (i.e., matching one's current salary), and enhanced annual leave computation (i.e., allowing credit for relevant private sector experience in the computation of annual leave).



These shortcomings (lack of ability to give advice and for some Specialists a lack of a full understanding of hiring flexibilities) were not recognized by WFA management because it had not surveyed its customers to determine their satisfaction (or dissatisfaction) level with Staffing Specialists. The MSP specifically tasks the WFA Staffing Specialists with the responsibility to consult and advise the SOs and panel about the plan, provide appropriate training, and issue instructions, procedures, or other communications required to clarify, update, and improve the plan's implementation. Management needs controls, such as surveys, to determine if it is fulfilling this responsibility. We also discuss the need for better WFA management oversight further in the next section.

WFA needs to consider GAO's *Standards for Internal Control in the Federal Government* advice to "[v]iew human capital as an asset rather than a cost. Only when the right personnel for the job are on board and are provided the right training, tools, structure, incentives, and responsibilities is operational success possible."<sup>12</sup>

## Recommendations

We recommend that the WFA Director:

1. Ensure that Staffing Specialists are properly trained and knowledgeable about recruitment issues and the hiring process including hiring flexibilities;
2. Develop a Satisfaction Survey modeled on OPM's Management Satisfaction Survey (<http://study.opm.gov/mss/>) to determine managers' satisfaction levels with the hiring process and identify strategies for making process improvements.

## Management Response

HRS agreed with our recommendations.

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<sup>12</sup> The U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, November 1999.

## II. WFA Staff Performance is Not Adequately Measured

The job performance of WFA staff are neither monitored nor evaluated effectively by WFA management. None of the performance appraisals we reviewed identified a staff member's accomplishments during the rating period or provided a narrative justification to explain how a staff member contributed to the organization's strategic goals.

Monitoring and evaluation of staff job performances is ineffective because reliable statistics on staff work are not available for the WFA Director's review. Statistics on staff work that are available are accessible through the automated EmpowHR system, but those statistics are incomplete because WFA staff are not entering their work data into EmpowHR consistently. Reliable statistics on staff work for review requires manual research of both original records and EmpowHR.

The format of the automated reports which are available for the WFA Director include fields for listing every Library job vacancy and the status of each vacancy's hiring steps. The reports, however, do not include a field for summary information which could be used to objectively assess whether staff are meeting target deadlines, such as providing the candidate referral list to an SO within 10 days of a vacancy's closing.

The performance appraisals that we reviewed revealed two significant deficiencies: first, because statistical data is not conveniently available, the WFA Director has resorted to an appraisal template, but the template does not provide the means to compare "expected results" to "actual results." As a result, none of the performance appraisals that we reviewed addressed critical goal criteria such as the organization's Annual Performance Plan (AP3) for fiscal year (FY) 2008 or metrics included in a staff member's Performance Plan (e.g., the requirement that a Specialist submit an Initial Referral List to an SO within 10 business days).

Second, staff performance appraisals include narratives, which are required by Library of Congress Regulation (LCR) 2017-2, *Performance Appraisal Plan for Non-Bargaining Unit, Non-Managerial/Non-Supervisory Staff, GS-15 and Below*. However,

the narratives are broad in nature and in many instances identical from one staff member's appraisal to another. Examples of blanket phrases in the narratives included "[s]he assisted WFA in the recruitment of well over 200 candidates for the fiscal year;" (Staffing Specialists), and, "...assisted the entire WFA team in bringing down the overall errors with PAR processing..." (Staffing Assistants). An appraisal of a staff member's performance which relies on general statements and lacks specific substantive commentary is of little or no value. For example, the appraisals of WFA staff do not provide the WFA Director with effective instruments to make recommendations to staff members for improving their performance. Moreover, the majority (69 percent) of WFA staff expressed dissatisfaction with the appraisals' non-specific nature.

Providing appraisals to staff members with little or no specific substance has been a long-standing problem within HRS. As we stated in a previous report,

"The majority of internal individual performance reviews documented in the first half of FY 2003 used broad, vague statements that did not give a relatively clear indication of the quality or quantity of the employee's work. We found little focus on expected outcomes or outputs, such as the number of activities an employee accomplished, for which the supervisor could more objectively assess or measure performance."<sup>13</sup>

WFA should follow GAO's *Standards for Internal Control in the Federal Government* by providing "[q]ualified and continuous supervision ...to ensure that internal control objectives are achieved. Performance evaluation and feedback, supplemented by an effective reward system, should be designed to help employees understand the connection between their performance and the organization's success."<sup>14</sup>

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<sup>13</sup> HRS Is Responding To Performance Challenges, But Additional Controls and Oversight Are Needed, Audit Report No. 2003-PA-101, September 2003.

<sup>14</sup> The U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, November 1999.

## Recommendations

We recommend that the WFA Director:

1. Prepare performance appraisals which compare employees' actual accomplishments with corresponding performance requirements; and
2. Develop, in coordination with the Strategic Planning and Automation Director, reports which identify the workloads and results of the Staffing Specialists and Assistants.

## Management Response

HRS agreed with our recommendations.

### III. Recruitment Efforts Need Strengthening

Recruiting activities are a vital component of the Library's hiring process. They provide the means to inform potential employees about the Library's mission, possible careers, and employee benefits. When effectively implemented, they successfully target and attract job seekers who have specialized skills and talent to employment opportunities within the Library.

Notwithstanding the importance of this function, WFA has neither determined whether the Library's recruitment efforts are efficient and effective, nor designed the Library's career Web page to attract potential employees.

*a. The Efficiency and Effectiveness of Recruitment Efforts are Unknown*

We found that neither WFA nor the Library's Office of Opportunity, Inclusiveness and Compliance, (OIC)<sup>15</sup> were tracking the recruitment method by which new employees were hired. For example, information is not being tracked on the number of new hires who were recruited through job fairs, internships, or fellowship programs. As a result, neither organization is able to assess the effectiveness of the Library's various recruitment efforts.

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<sup>15</sup> OIC is responsible for administering key Library workforce diversity programs and the Library's EEO program.

According to the then-Acting Director, OIC does not have a statistician who has the necessary skills to gather and interpret data on the Library's recruitment activities. However, OIC is working with the Library's Information Technology Services organization to gather the needed data from the National Finance Center for the Equal Employment Opportunity Management Directive 715<sup>16</sup> *Workforce Data Tables*. The data tables are tools for analyzing trends in Library employment.

Sound advice included in GAO's *Standards for Internal Control in the Federal Government* recommends that federal agency managers track major agency achievements and compare them to the agency's plans, goals, and objectives.<sup>17</sup> Doing so would help the managers assess the effectiveness of an agency's performance. The Library should adopt GAO's guidance on tracking major agency achievements as a best practice. HRS plans to begin collecting recruitment data in FY 2010 through its "New Employee Experience" survey.

### Recommendation

We recommend that the WFA Director and the OIC Director develop a methodology to track and analyze data regarding the Library's recruiting and hiring activities.

### Management Response

HRS agreed with our recommendation

#### *b. The Library's Career Web Page Needs Revamping*

The Library's public career Web page, titled "Working at the Library," is mainly textual and does not adequately explain the Library's career opportunities. In contrast, career Web pages of other federal agencies are more user-friendly and make good use of colorful photographs, which makes them more visually appealing to job seekers. For example, the

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<sup>16</sup> Management Directive 715 (MD-715) is the policy guidance which the Equal Employment Opportunity Commission (EEOC) provides to federal agencies for their use in establishing and maintaining effective equal employment opportunity programs under Section 717 of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq., and Section 501 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 791 et seq.

<sup>17</sup> The U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, November 1999.

Smithsonian, GAO, and the U.S. Government Printing Office are more user-friendly.



The Smithsonian's Web page is colorful and user-friendly

In addition, we found that the Library's "Vacancy Announcement Terms," Web page listed terms which may be unfamiliar to job seekers and forced interested applicants to search through buried information to find answers to important career questions. For example, HRS' explanation of "excepted service" and its impact on federal career service is unclear to many applicants. Through a survey, we determined that 70 percent of our sample of newly-hired employees did not understand the meaning of the term even after they had begun working at the Library.

Library employment is considered to be in the excepted service, which means it does not confer competitive/career status on an employee. Without the competitive/career status, Library employees' career mobility within the federal government is hindered because many executive agency vacancies are open only to federal employees with

career/competitive status. As a result, Library employees may become frustrated and less productive when they realize they cannot advance their career in the federal government because of their excepted service status.

Because it was unable to achieve legislation that would grant the Library an interagency excepted service agreement (which would confer competitive status on Library staff), we believe that it should make this more clear to prospective employees who may be considering several federal government options, as it could be a critical factor in their employment decision.

GAO in its *Standards for Internal Control in the Federal Government* encourages agencies to “[e]nsure there are adequate means of communicating with, and obtaining information from, external stakeholders that may have a significant impact on the agency achieving its goals.”<sup>18</sup>

### **Recommendation**

We recommend that the WFA Director make the contents of the Library’s “Jobs/Fellowships” Web page and its related pages more inviting and informative to job seekers who are exploring Library career opportunities, and ensure that terms used in those pages are clearly explained.

### **Management Response and OIG Comment**

HRS agreed to consult with the Human Capital Flexibilities Working Group to determine what if any changes should be made. We believe this action addresses our finding, but will follow up to determine actions taken.

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<sup>18</sup> The U.S. Government Accountability Office’s *Standards for Internal Control in the Federal Government*, November 1999.

## » CONCLUSION

In 2009, Congress introduced legislation to streamline the recruiting-hiring process of executive branch agencies to make it easier for those agencies to attract a diverse and highly qualified workforce. Over the past five years, HRS has made strides to improve the overall hiring process including fine-tuning the crediting plan/questionnaires used in AVUE to better determine which individuals possess the qualities and skills needed. However, the WFA needs to improve its services and communication with selecting officials to ensure the Library is able to effectively compete with other federal agencies for talented job seekers.

The Library must brand itself as “an employer of first choice” to attract a new generation of workers with a wide range of skills. To do this, it must improve the format of its career Web pages, be more creative in its recruitment efforts, and streamline its hiring process. Moreover, it needs WFA to become more proactive and improve its hiring assessment tools.

The recruiting and hiring activities of the Library are highly visible. Advanced planning, effective use of technology, and clear and continuous communication are keys to an effective and efficient process. HRS and line management must work collaboratively, communicate openly and share accountability equitably. Filling vacancies through an effective process should yield high productivity, increased employee morale, improved teamwork, and reduced turnover—all of which contribute to strong organizational performance.

### **Major Contributors to This Report:**

Nicholas Christopher, Assistant Inspector General for Audits  
Patrick Cunningham, Senior Auditor  
Cornelia E. Jones, Auditor



**▶▶ APPENDIX A: ACRONYMS USED IN THIS REPORT**

GAO	U. S. Government Accountability Office
HRS	Human Resources Services
KSAs	Knowledge, Skills, and Abilities
LCR	Library of Congress Regulation
Library	Library of Congress
MSP	Merit Selection Plan
OIC	Office of Opportunity, Inclusiveness and Compliance
OIG	Office of the Inspector General
OPM	Office of Personnel Management
SME	Subject Matter Expert
SO	Selecting Official
Specialist	Staffing Specialist
USDA	United States Department of Agriculture
WFA	Office of Workforce Acquisitions

## ▶▶ APPENDIX B: EXAMPLES OF KSAs

**Avue Digital Services-KSAs / COMPETENCIES - Microsoft Internet Explorer**

Address: <https://www.avuedigitalservices.com/casting/control/doAdvancedQualificationQuest;jsessionid=a13a53d930d54f916217a26c4713>

### WRITER-EDITOR

**Knowledge of reference sources and research techniques.**

Wrote and edited materials using reference sources and research techniques.

- Researched factual information from readily available sources to write or edit technical documents, training manuals, or pamphlets
- Interpreted information on a variety of subjects that concerned established policies and programs or established aspects of a subject matter field.
- Applied diverse reference sources and extensive research to write or edit materials.
- None of the above.

Provide a brief description of your specific experience, education, knowledge, and/or training which supports your response to the KSA statement above. Relate your descriptions directly to each KSA statement. Do not simply repeat the KSA statement or use general language such as "see attached resume". You may want to prepare your description in a word processing document and copy and paste it into the text box.

Spell Check Save and Continue Editing on this Page

Application Instructions (do not include classified information)

TECHNICAL SUPPORT

**Avue Digital Services-KSAs / COMPETENCIES - Microsoft Internet Explorer**

Address: <https://www.avuedigitalservices.com/casting/control/doAdvancedQualificationQuest;jsessionid=a13a53d930d54f916217a26c4713>

### SUPERVISORY PROGRAM SPECIALIST

**Ability to plan, prepare and execute budgets.\*\***

Planned, prepared, justified, and executed budgets for an organization. This included 1) participating in agency financial planning activities; 2) forecasting both near and long term budget requirements for ongoing operations; 3) developing internal agency budget proposals for new initiatives; 4) preparing budget justifications for external audiences; 5) establishing the initial annual business operating plan; 6) monitoring the execution of expenditures against the operating plan; and 7) preparing monthly and quarterly status of funds reports.

- Performed ALL of the above financial planning, budgeting, and execution activities for a section or work unit in the Federal sector for BOTH personal and non-personal object classes.
- Performed ALL of the above financial planning, budgeting, and execution activities for a division, bureau or organization within a Federal department or agency or for a major Federal program/project for BOTH personal and non-personal object classes.
- Performed ALL of the above financial planning, budgeting, and execution activities in a Federal organization for EITHER personal OR non-personal object classes.
- None of the above.

Provide a brief description of your specific experience, education, knowledge, and/or training which supports your response to the KSA statement above. Relate your descriptions directly to each KSA statement. Do not simply repeat the KSA statement or use general language such as "see attached resume". You may want to prepare your description in a word processing document and copy and paste it into the text box.

TECHNICAL SUPPORT



▶▶ APPENDIX D: MANAGEMENT RESPONSE

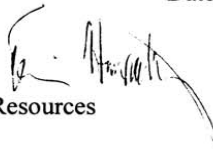
United States Government

*Human Resources Services*  
 Director for Human Resources

**Memorandum**

Library of Congress

TO : Karl W. Schornagel  
 Inspector General Date: October 27, 2009

FROM : Dennis M. Hanratty   
 Director for Human Resources

SUBJECT : Human Resources Services (HRS) Comments on  
 Draft Audit Report No. 2009-PA-101

Thank you for the opportunity to comment on Draft Audit Report No. 2009-PA-101, *HRS has Made Strides in Improving Recruiting and Hiring, but Opportunities for Improvement Still Exist*. We are pleased the report recognizes the timely, courteous and effective service that exemplifies the Office of Workforce Acquisitions (WFA).

Although the audit report provides areas of potential improvement for HRS, the report does not recognize significant areas where the Library’s internal processes are not conducive to the guidelines set forth by the Office of Personnel Management (OPM) or where our processes are, in some cases, more effective and efficient than those proposed by OPM. Specifically, HRS is concerned by comparisons and characterizations made in the narrative portions of the report under: 1) The Library’s Hiring Timeline and Comparison with the OPM Timeline for Competitive Service Exceptions (pages 5 – 7); and 2) Efficiency and Effectiveness of Recruitment Efforts (page 14).

The report points to several areas where the Library’s process exceeds the targeted time set by OPM for Executive Branch agencies through its End-to-End Hiring Process Roadmap (E2E Roadmap). In conjunction with the service and support unit representatives to the Human Capital Flexibilities Working Group, HRS will review OPM’s process roadmap to identify best practices that the Library may consider adopting. However, it should be noted at the onset that OPM states in its document that “...the number of days for each step within the 80 day Standard is based on agencies using E2E Roadmap as an integrated strategy and agency best practices. **Agencies may need to adjust the number of days for each step within the 80 days based on their particular practices and procedures** [emphasis added].”<sup>1</sup>

<sup>1</sup> OPM, End-To-End Hiring Initiative, pg. 27.

HRS contends that the Library must adjust the number of days to maintain the integrity and validity of its hiring process. Developed with the assistance of a highly-regarded firm of industrial psychologists, the Library's process uses content validation—one of the three validation strategies permissible under the Uniform Guidelines on Employee Selection Procedures—to establish the job-relatedness of selections. Job-relatedness is established by ensuring that the competencies and the assessment instruments used to fill a vacancy are related to the duties of the position. In 2001, the U.S. District Court in the District of Columbia determined the Library's process to be content valid.<sup>2</sup> Our process, recognized as a best practice, provides significant protection to the Library, in the event its selection decisions are legally challenged.<sup>3</sup>

Our focus on content validity contributes to Library differences with OPM's standard, as reported in Figure 1 (page 6) of the draft audit report. The following are comments regarding specific portions of Figure 1:

1. Validating Need and Posting Announcement –Library Actual Days 20 v. OPM Standard of 10 Days

The Library takes an average of 20 days rather than OPM's 10 recommended days to validate the job analysis documentation prior to posting a vacancy announcement. This timeframe had been reduced by a flexibility that allows Selecting Officials (SOs) to choose to rely on recent job analysis materials (i.e., those developed for job series, job families, or individual position(s) within a two year period).<sup>4</sup> The 20-day average is both efficient and impressive, considering the critically-important work that occurs in this time period. The Job Analysis Panel determines basic qualification requirements and competencies; completes the Job Analysis Worksheet/Matrix, the applicant questionnaire/crediting plan, and the final structured interview questions and benchmarks; and approves all documentation to be used in the selection process. This phase of the process is the essence of our process's validity.

2. Opening and Closing Announcement – Library Actual Days 15 v. OPM Standard of 10 Days

HRS contends that an average vacancy posting of only 10 days is typically insufficient for a Library competitive posting. The Library has established ten days as the **minimum** period a Service Unit may choose. Each posting period is decided by the Service Unit based on its decision as to the optimal posting period for the position.<sup>5</sup>

Service units weigh numerous factors in determining the posting period. For example, the area of consideration is an important determinant. A service unit recruiting

<sup>2</sup> Cook et al. v. Billington, Civil Action No. 82-0400 (GK), R. 880.

<sup>3</sup> H.R. Executive Online, *Making the Business Case for Assessments* (June 16, 2009); [www.aptmetric.com/consulting/webinar/TestingTes\\_files/slide0185.htm](http://www.aptmetric.com/consulting/webinar/TestingTes_files/slide0185.htm).

<sup>4</sup> See, Library of Congress Merit Selection Plan, June 10, 2005 (Revised January 8, 2009) Section VIII. B.7. Pg. 12

<sup>5</sup> The "assigned to" column in Figure 1 on the Hiring Statistics report should reflect the role of the SU and WFA.

nationally for a specific position will generally require a longer posting period to ensure wide notification of potential candidates, a requirement that may not be necessary for a position where the candidates are locally recruited or where the announcement is limited to Library or Service Unit employees.

The diversity of the potential referral pool is another critical factor in the determination of the posting period. The Library's efforts here are both unique and effective. Prior to the vacancy closing, the SO is advised as to whether the pool of applicants available at that time contains members of the groups identified as underrepresented in the vacancy recruitment plan. If diversity is not available or the applicant pool does not appear large enough in the SO's opinion, then the SO has the option of extending the posting period. Our ultimate hiring goal is to recruit and hire a diverse pool of best-qualified candidates. We do not want the posting period to be a barrier in accomplishing this objective.

3. Selecting Official and Panel Reviewing Applicants and Making Tentative Job Offers – Library Actual Days 49 v. OPM Standard of 18 Days

HRS and the Human Capital Flexibilities Working Group will review the current Library 90-day standard and 49-day actual timeframes and determine if changes should be made. However, our process significantly differs from the competitive selection process found in the Executive Branch and that forms the basis of the OPM 18-day standard. First, OPM uses a "rule of three" process, meaning that only three candidates are referred for the interview process. In contrast, the Library refers the top seven candidates plus any candidates with tied scores as a minimum referral. Indeed, the number referred is often much higher as the SO has the ability to expand the pool in rank order in an effort to reach qualified candidates identified as underrepresented in the recruitment plan. Cognizant of the importance of diversity coupled with a desire to identify the best candidates, a large majority of SOs expand the referral pool.

Moreover, SOs often use narrative application reviews, preliminary telephone interviews and the full structured interviews as candidate screening tools. An SO also has the flexibility to screen the first referral pool and request additional candidates if the pool does not yield sufficient numbers of highly qualified candidates. This flexibility is efficient as it allows the SO to use the original applicant pool without having to repost the vacancy. If we force SOs to complete their screenings, including interviews, in an 18-day period, they will likely interview the minimum number of candidates required. This would adversely affect the diversity of our interview pools and, potentially, the quality of our selectees.

4. Security Check – Library Actual days 5+ v. OPM Standard of 10 Days

This should be referred to as a "Preliminary Security Check."

5. Official Offer/Accept – Library Actual Days 13 v. OPM Standard of 2 Days

We were unclear as what was being measured in this phase. Does it include the preliminary security investigation that takes place before the conditional official offer? Does it include the time from the Service Unit/SO’s informal offer until acceptance? Were there outliers that skewed this measurement? We agree that the time of HRS’ conditional<sup>6</sup> official offer until acceptance should be less than 13 days and that if the initial personnel security check is completed, a 2-day time period is an acceptable standard.

**Detailed Comments**

Our detailed comments, relative to the findings of Draft Audit Report No. 2009-PA-101, are as follows:

**I. The WFA Should Improve the Hiring Process**

**a. WFA Needs to More Effectively Track and Assess the Time for Each Hiring Step**

***Recommendations***

*We recommend that the WFA Director:*

- 1. Require the Staffing Specialists and the Staffing Assistants to consistently enter complete hiring data in EmpowHR; and*
- 2. Compare actual hiring data with planned results and periodically assess and adjust the time goals for each hiring step.*

**HRS Response – Concur.**

1. WFA is working to clarify staff understanding of the available data fields in EmpowHR and is looking to full implementation of that system by December 31, 2009.
2. The WFA Director will compare data quarterly and adjust processes as required.

**b. WFA Should Address Non-value-added Steps in the Hiring Process**

***Recommendation***

*We recommend that the WFA Director reevaluate the process needed for each hiring step, with specific emphasis on eliminating non-value added steps.*

**HRS Response – Do Not Concur.**

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<sup>6</sup> This section should refer to the “conditional official offer” as the offer is often conditioned on Personnel Security completing its security investigation satisfactorily. Typically, the applicant can begin work during this time period.

HRS disagrees with the conclusions reached in this section of the report for three reasons. First, we contend that the steps labeled as non-value added do, in fact, add significant value to the selection process. Second, we do not believe that these steps cause significant delays to the process. Third, we feel that this section masks the actual factors that produce hiring delays.

Working in close consultation with its team of industrial psychologists, the Library consciously identified roles for the HRS Staffing Specialists at key junctures of the selection process. Research in the field of industrial psychology indicates that group discussion can help eliminate some errors often found in the decision process. However, dissenting opinions may sometimes be ignored in employment decisions, particularly when hierarchical differences exist in the group. Nonetheless, healthy group discussion can be encouraged by including others with different points of view. This increases the likelihood that all views are heard and that selection decisions will be more accurate, reliable, and valid.

As noted above, we do not believe that the role of the Staffing Specialists unduly delay the process. Staffing Specialists monitor when panels meet and typically join them when the members are ready for facilitated discussions and recording of scores. As a general rule, another Staffing Specialist will substitute if the original Staffing Specialist is unavailable.

Finally, focusing on the role of the Staffing Specialists diverts attention from the most significant time challenges we face: namely, the availability of panel members to conduct job analysis and interview candidates. Under our Merit Selection Plan, SOs must request and justify extensions of postings if the selection actions require more than 90 days. It is exceedingly rare for the SOs to identify our staff's unavailability as the basis for the delay. Instead, requestors typically cite the pressure of competing work assignments on a daily basis, travel and training commitments of panel members, absences resulting from sick and annual leave, and the like.

### **c. Staffing Specialists Need Training to Better Advise Clients**

#### ***Recommendations***

*We recommend that the WFA Director:*

- 1. Ensure that Staffing Specialists are properly trained and knowledgeable about recruitment issues and the hiring process including hiring flexibilities;*
- 2. Develop a Satisfaction Survey modeled on OPM's Management Satisfaction Survey (<http://study.opm.gov/mss/>) to determine managers' satisfaction levels with the hiring process and identify strategies for making process improvements.*

**HRS Response - Concur.**



1. The WFA Director will ensure that all staff are well trained and sufficiently knowledgeable about the full range of hiring flexibilities available to Library managers.
2. WFA has designed a customer satisfaction survey for selecting officials and will employ it in all merit selection cases by December 31, 2009.

**II. WFA Staff Performance is Not Adequately Measured**

***Recommendations***

*We recommend that the WFA Director:*

1. *Prepare performance appraisals which compare employees' actual accomplishments with corresponding performance requirements; and*
2. *Develop, in coordination with the Strategic Planning and Automation Director, reports which identify the workloads and results of the Staffing Specialists and Assistants.*

**HRS Response – Concur.**

1. Performance appraisal documents will be designed that better reflect the responsibilities of each employee and that incorporate more measurable data. These documents will be utilized by December 31, 2009.
2. WFA currently has an automated tool that captures and tracks measurable data on a monthly basis. (See HRS Response to items I.a.1 and I.a.2 above.)

**III. Recruitment Efforts Need Strengthening**

***Recommendations***

**a. The Efficiency and Effectiveness of Recruitment Efforts are Unknown**

***Recommendation***

*We recommend that the WFA Director and the OIC Director develop a methodology to track and analyze data regarding the Library's recruiting and hiring activities.*

**HRS Response – Concur, with exception.**

The Library has in place tools for effectively tracking, storing and using previously successful recruitment sources in the development of recruitment plans for individual vacancy announcements. During the interview process, each interviewee is asked to complete a form that identifies his or her recruitment source. The data collected on these forms from those candidates found "fully acceptable" for selection are then entered in the Library's recruitment database. The database may then be searched by job,

job series or family. Previously successful recruitment sources entered with previous job postings are then available and utilized in the development of the vacancy's individual recruitment plans.

Notably, the Library's recruitment strategies extend beyond the competitive selection process. We also fill some permanent positions through targeted recruitment allowed by Library regulations under the following programs:

- *Presidential Management Fellowship (PMF) Program:* The PMF program, established by Executive Order, draws graduate students from diverse social and cultural backgrounds to apply for public service jobs in the Federal Government.
- *Selective Placement Program:* The Library uses this program to hire candidates with documented, severe disabilities.
- *HACU Cooperative Education Program:* Qualified students who successfully complete a minimum of 640 hours of career-related work at the Library may be converted noncompetitively to permanent-conditional positions for which they qualify within 120 days of completing their academic degree requirements.

We agree that HRS and OIC should more closely analyze our recruitment and hiring data and make adjustments as appropriate. WFA currently has a Staffing Specialist on detail to OIC to study diversity recruitment strategies. That project will also include recommended improvements on usage of hiring flexibilities under the Selective Placement Program and the modification of any related policies or procedures.

#### **b. The Library's Career Web Page Needs revamping**

##### ***Recommendation***

*We recommend that the WFA Director make the contents of the Library's "Jobs/Fellowships" Web page and its related pages more inviting and informative to job seekers who are exploring library career opportunities, and ensure that terms used in those pages are clearly explained.*

##### **HRS Response – Concur, with exception.**

HRS receives many positive comments on the informational and navigational ease of the design. Nonetheless, HRS will review this recommendation with the Human Capital Flexibilities Working Group to determine if web page changes should be made. If so, HRS and the Working Group will consult with the Office of Strategic Initiatives, which is responsible for the look of all public web pages.