

March 2010

# WORKFORCE PLANNING

Interior, EPA, and the  
Forest Service Should  
Strengthen Linkages  
to Their Strategic  
Plans and Improve  
Evaluation



GAO

Accountability \* Integrity \* Reliability



Highlights of [GAO-10-413](#), a report to congressional committees

## Why GAO Did This Study

GAO and others have shown that successful organizations use strategic workforce planning to help meet present and future mission requirements. Although agency approaches to strategic workforce planning can vary depending on needs and mission, GAO and the Office of Personnel Management have identified six leading principles that workforce planning should address. The Appropriations Committees directed GAO to review workforce planning at the Department of the Interior (Interior), the Environmental Protection Agency (EPA), and the Department of Agriculture's Forest Service. GAO examined (1) workforce planning processes used at each agency, (2) the extent to which these processes incorporate the six principles, and (3) how, if at all, the agencies link workforce planning with the annual budget allocation processes. GAO reviewed agencies' workforce plans, strategic plans, and budget documents and interviewed human resources, planning, and budget officials.

## What GAO Recommends

GAO recommends, among other things, that the agencies establish mechanisms to monitor and evaluate their workforce planning efforts. In commenting on a draft of this report, EPA generally agreed with the recommendations but proposed a modification, and the Forest Service generally agreed with the report's findings and conclusions. Interior provided a technical comment.

View [GAO-10-413](#) or [key components](#). For more information, contact Anu K. Mittal at (202) 512-3841 or [mittala@gao.gov](mailto:mittala@gao.gov), or John B. Stephenson at (202) 512-3841 or [stephensonj@gao.gov](mailto:stephensonj@gao.gov).

## WORKFORCE PLANNING

### Interior, EPA, and the Forest Service Should Strengthen Linkages to Their Strategic Plans and Improve Evaluation

#### What GAO Found

Interior, EPA, and the Forest Service vary in their approaches to workforce planning. Interior's workforce planning occurs at its eight bureaus, which use departmental guidance to develop their own workforce plans in a generally consistent format. EPA issued an agencywide plan in 2006 that is currently being updated, and the Forest Service has issued annual agencywide workforce plans since 2007.

The agencies vary in the extent to which they incorporate the six leading workforce planning principles, but they generally do not link their workforce plans and their strategic plans or monitor and evaluate their workforce planning efforts. The six leading principles and agency actions are as follows:

- *Align workforce planning with strategic planning and budget formulation.* The agencies generally do not align their workforce and strategic plans and differ in whether they considered their workforce plans when formulating their budgets.
- *Involve managers, employees, and other stakeholders in planning.* The agencies varied in the extent to which they involved top managers and others in developing workforce plans.
- *Identify critical occupations, skills, and competencies and analyze workforce gaps.* The agencies have taken some steps to identify mission-critical occupations and competencies, which form the basis for much of the agencies' workforce planning.
- *Develop strategies to address workforce gaps.* The agencies have identified some strategies to address certain workforce gaps.
- *Build capacity to support workforce strategies.* The agencies varied in the actions they have taken to support workforce planning efforts through the effective use of human capital flexibilities, such as recruitment and retention incentives.
- *Monitor and evaluate progress.* The agencies generally have not monitored and evaluated the results of their workforce planning efforts.

The agencies do not directly link their workforce planning and budget allocation processes. At Interior, although unit and program officials in some bureaus use workforce plans to distribute staff geographically, the bureaus do not track how program officials use workforce plans to allocate funds. EPA's process for allocating resources involves making annual incremental adjustments to prior year allocations and does not directly link to workforce plans. The Forest Service's budget allocation guidance does not mention workforce planning directly. However, according to Forest Service executive leaders, the agency takes workforce planning information into consideration at the unit and program levels during budget formulation and again during the annual budget allocation process.

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## Abbreviations

EPA	Environmental Protection Agency
FTE	full-time equivalent
Interior	Department of the Interior
OMB	Office of Management and Budget
OPM	Office of Personnel Management

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United States Government Accountability Office  
Washington, DC 20548

March 31, 2010

The Honorable Dianne Feinstein  
Madam Chairman  
The Honorable Lamar Alexander  
Ranking Member  
Subcommittee on Interior, Environment,  
and Related Agencies  
Committee on Appropriations  
United States Senate

The Honorable James P. Moran  
Chairman  
The Honorable Michael K. Simpson  
Ranking Member  
Subcommittee on Interior, Environment,  
and Related Agencies  
Committee on Appropriations  
House of Representatives

The ability of federal agencies to achieve their missions and carry out their responsibilities depends in large part on whether they can sustain a workforce that possesses the necessary education, knowledge, skills, and competencies. We and others have shown that successful public and private organizations use strategic management approaches to prepare their workforces to meet present and future mission requirements. Strategic human capital management—which includes workforce planning—helps ensure that agencies have the talent and skill mix they need to address their current and emerging human capital and other challenges, such as long-term fiscal constraints and changing demographics. Preparing a strategic human capital plan encourages agency managers and stakeholders to systematically consider what is to be done, how it will be done, and how to gauge progress and results. In 2001, we first identified strategic human capital management as a high-risk area because of the federal government’s long-standing lack of a consistent approach to human capital management. In 2010, while agencies and Congress have taken steps to address the federal government’s human capital shortfalls, strategic human capital management remains a high-risk area because of the continuing need for a governmentwide framework to advance human capital reform.

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Strategic workforce planning addresses two critical needs: (1) aligning an organization's human capital program with its current and emerging mission and programmatic goals and (2) developing long-term strategies for acquiring, developing, and retaining staff to achieve programmatic goals. Agency approaches to such planning can vary with each agency's particular needs and mission. While different approaches may be appropriate, we and the Office of Personnel Management (OPM) have identified six leading principles that such approaches should incorporate regardless of the context in which planning is done.<sup>1</sup> Specifically, agencies need to

- align workforce planning with strategic planning and budget formulation;
- involve managers, employees, and other stakeholders;
- identify critical occupations, skills, and competencies and analyze workforce gaps;
- employ workforce strategies to fill the gaps;
- build the capabilities needed to support workforce strategies through steps to ensure the effective use of human capital flexibilities;<sup>2</sup> and
- monitor and evaluate progress toward achieving workforce planning and strategic goals.

In the Explanatory Statement accompanying the Omnibus Appropriations Act of 2009, the Appropriations Committees expressed concern that workforce plans for the Department of the Interior (Interior), the Environmental Protection Agency (EPA), and the Department of Agriculture's Forest Service may be outdated and that the agencies may not have undertaken comprehensive reviews of staffing needs for the

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<sup>1</sup>GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, [GAO-04-39](#) (Washington, D.C.: Dec. 11, 2003). OPM, which developed its *Human Capital Assessment and Accountability Framework* in conjunction with the Office of Management and Budget and GAO, issued the final regulations for this framework in April 2008 (73 FR 23012-23049).

<sup>2</sup>Human capital flexibilities represent the policies and practices that an agency has the authority to implement in managing its workforce—for example, work-life programs, monetary incentives and awards, and special hiring authorities. See GAO, *Human Capital: Effective Use of Flexibilities Can Assist Agencies in Managing Their Workforces*, [GAO-03-2](#) (Washington, D.C.: Dec. 6, 2002).

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future.<sup>3</sup> The Explanatory Statement directed us to review existing workforce planning processes at these agencies.

As agreed with your offices, this report examines (1) the workforce planning processes in place at Interior, EPA, and the Forest Service; (2) the extent to which workforce planning at these agencies incorporates leading principles that we and OPM have identified; and (3) how, if at all, these agencies link workforce planning with their annual budget allocation processes. We briefed your offices on the preliminary results of our work on December 17 and 18, 2009. As agreed with your offices, this report provides more detail on the information we presented at these briefings, and appendix I contains the briefing slides we provided.

To conduct this review, we examined the current workforce planning processes at Interior, EPA, and the Forest Service. The periods reviewed at each agency varied because each agency had developed its plans at different times. Specifically, at Interior, we reviewed workforce planning efforts at the eight bureaus from fiscal year 2008, when the bureaus issued their most current workforce plans, through December 2009. At EPA, we focused on workforce planning at the agencywide level from fiscal year 2006 through December 2009 because the most current workforce plan was issued in 2006. Finally, at the Forest Service, we focused on agencywide workforce planning from fiscal year 2007, when the agency established its current workforce planning process, through December 2009. Because our review focused on workforce planning at the agencywide or bureau levels, we conducted limited work at lower-level units, such as regions. We reviewed agency and bureau workforce plans, strategic plans, budget documents, and guidance and, in limited cases, documents from other levels in the organizations, and updated the budget information from the briefing for this report. We interviewed agency and bureau planning, human resources, budget, and program officials responsible for these plans. A more detailed description of our scope and methodology is presented in appendix II.

We conducted this performance audit from July 2009 through March 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our

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<sup>3</sup>Omnibus Appropriations Act, 2009, Committee Print of the House Committee on Appropriations, Pub. L. No. 111-8 (2009).

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findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

The three agencies we reviewed—Interior, EPA, and the Forest Service—have broad missions and differ in organizational structure and workforce size.<sup>4</sup>

Interior’s mission is to protect and manage the nation’s natural resources and cultural heritage; provide scientific and other information about those resources; and honor its trust responsibilities. To carry out this mission, Interior and its eight bureaus employ about 70,000 full-time equivalent (FTE) employees who account for almost 55 percent of the department’s operating budget,<sup>5, 6</sup> and over 200,000 volunteers. Interior’s workforce is distributed across about 2,400 locations nationwide, and the department’s regional and field structure varies by bureau. For fiscal year 2010, Interior received appropriations totaling about \$20 billion.<sup>7</sup>

EPA’s mission is to protect human health and the environment by leading the nation’s environmental science, research, education, and assessment efforts. The agency consists of 10 regional offices and 13 program offices, and its budget for fiscal year 2010 is \$10.3 billion. Its workforce is made up of approximately 17,000 FTEs. Associated costs for these 17,000 FTEs constitute about 20 percent of the 2010 budget.<sup>8</sup> EPA also employs about 6,000 individuals such as contractor employees; interns; and Senior

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<sup>4</sup>Interior and the Forest Service have similar missions on some of the lands they manage.

<sup>5</sup>The eight bureaus are the Bureau of Land Management, Bureau of Reclamation, Indian Affairs, Minerals Management Service, National Park Service, Office of Surface Mining Reclamation and Enforcement, U.S. Fish and Wildlife Service, and U.S. Geological Survey.

<sup>6</sup>An FTE consists of one or more employed individuals who collectively complete 2,080 work hours in a given year. Therefore, both one full-time employee and two half-time employees equal one FTE.

<sup>7</sup>For fiscal year 2010, Interior estimates the department will collect about \$9.7 billion in receipts from mineral leases on onshore and offshore federal lands and various fees. A portion of receipts offset federal appropriations and a portion is disbursed to states and Indian tribes.

<sup>8</sup>However, in recent prior years, employees constituted generally about 30 percent of the budget. The fiscal year 2010 budget of \$10.3 billion was higher than any EPA budget since 1999, when budgets ranged from \$7.5 to \$8.4 billion. Besides funding for employees, other portions of the budget went for grants, trust funds, and infrastructure financing.



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Environmental Employment Program workers, who are at least 55 years old and are not federal employees, to provide their skills to support environmental programs.

The Forest Service's mission is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. To do so, the agency manages approximately 193 million acres of federal land with a fiscal year 2010 budget of about \$6.2 billion and approximately 34,000 FTEs nationwide.<sup>9</sup> The agency's employees are located at 155 national forests within nine regions, as well as at other units, including seven research units. Projected personnel and benefits costs constitute 60 percent of the Forest Service's budget; the agency also relies on about 70,000 volunteers.

Appendix III provides information on the number of FTEs at Interior, EPA, and the Forest Service from fiscal years 1999 through 2010.

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## Workforce Planning and Leading Principles

People are an agency's most important asset: they affect an agency's capacity to achieve its mission. In this context, several organizations, including GAO, have shown that successful organizations in both the public and private sectors use strategic workforce planning to prepare their workforces to meet present and future mission requirements. Preparing a strategic workforce plan encourages agency managers and stakeholders to systematically consider what is to be done, when and how it will be done, what skills will be needed, and how to gauge progress and results.

As we have reported in the past, federal agencies have used varying approaches to develop and present their strategic workforce plans, depending on their particular circumstances. For example, an agency that is faced with the need for a long lead time to train employees hired to replace those retiring and an increasing workload may focus its efforts on estimating and managing retirements. Another agency with a future workload that could rise or fall sharply may focus on identifying skills to manage a combined workforce of federal employees and contractors. Regardless of the context in which workforce planning is done, we and

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<sup>9</sup>According to agency officials, the number of FTEs includes approximately 29,000 permanent full-time employees, as well as the Forest Service's temporary employees, which typically total approximately 17,000 each year.

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OPM have identified the following six leading principles that agencies should incorporate in their workforce planning efforts.

*Align their workforce planning with strategic planning and budget formulation.* Workforce planning that is linked to an agency's strategic goals is one of the tools agencies can use to systematically identify the workforce needed for the future and develop strategies for shaping this workforce. Strategic alignment occurs when an agency's workforce strategies are linked with its mission and goals and integrated into its strategic plan, performance plan, and budget formulation.<sup>10</sup> Such alignment allows agencies to assess and understand the extent to which their workforce contributes to achieving their overarching mission and goals. Among other things, workforce planning provides the information agencies need to ensure that their annual budget requests include adequate funds to implement their human capital strategies, such as recruitment or retention bonuses, awards, training, student loan repayments, and tuition assistance.

*Involve managers, employees, and other stakeholders.* Top leadership that is engaged in strategic workforce planning can

- set the overall direction and goals for workforce planning and provide organizational vision;
- help provide stability as the workforce plan is being developed and implemented;
- create support within the agency to ensure that planning strategies are implemented and sustained over time; and
- help integrate workforce planning efforts with other key management planning efforts, such as succession planning and information technology or financial management reforms, to ensure that such initiatives work together to achieve the agency's goals.

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<sup>10</sup>An agency's strategic plan establishes an agencywide vision that guides workforce planning and investment activities. The Government Performance and Results Act of 1993, Pub. L. No. 103-62 (1993), among other things, requires agencies to prepare strategic plans and annual performance plans that articulate goals for the upcoming fiscal year that are aligned with their long-term strategic goals.

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By involving agency managers, supervisors, employees, and other stakeholders on strategic workforce planning teams, agencies can develop new synergies that identify ways to streamline processes, improve human capital strategies, and help the agency recognize and deal with the potential effect that the organization's culture can have on the implementation of such improvements.<sup>11, 12</sup>

*Identify critical occupations, skills, and competencies and analyze workforce gaps.* Agencies need to determine the occupations, skills, and competencies that are critical to achieving their missions and goals, as well as to identify any gaps between their current workforce and the workforce they will need in the future. Identifying mission-critical occupations, skills, and competencies can help agencies adjust to changes in technology, budget constraints, and other factors that alter the environment in which they operate. The scope of agencies' efforts to identify their mission-critical occupations, skills, and competencies varies considerably, depending on their individual needs and interests. Whereas some agencies may decide to define all the skills and competencies needed to achieve their strategic goals, others may elect to focus on only those most critical to achieving their goals. Agencies can also use various approaches to determine their future needs, such as collecting qualitative information from interviews with agency executives and managers on the factors that influence the agencies' capability to acquire, develop, and retain critical skills and competencies; collecting information from employee surveys; and determining attrition rates, projected retirement rates, fluctuations in workload, and geographic and demographic trends. As agencies estimate the number of employees they need with specific skills and competencies, they may consider opportunities to reshape their workforce by re-engineering current work processes, sharing work among offices within the agency, or contracting.<sup>13</sup>

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<sup>11</sup>Stakeholders may include employee unions, congressional staff, and officials from other federal agencies, among others.

<sup>12</sup>The organization's culture refers to the underlying assumptions, beliefs, values, attitudes, and expectations generally shared by an organization's members.

<sup>13</sup>Federal agencies sometimes use private sector contractors to deliver services to citizens. In July 2009, the administration called for agencies to develop workforce plans that consider all the functions for which the agency is responsible and performance by all sectors of the workforce—not just federal employees.

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*Employ workforce strategies to fill the gaps.* Once agencies have identified gaps, they need to develop human capital strategies—the programs, policies, and processes that agencies use to build and manage their workforces—to close these gaps. These strategies, tailored to the agencies’ unique needs, may include strategies for hiring, training, staff development, succession planning, performance management, and the use of human capital flexibilities, among other things. These flexibilities may include providing early separation and early retirement incentives, recruitment and retention bonuses, alternative work schedules, and special hiring authorities to recruit employees with critical skills.

*Build the capabilities needed to support workforce strategies through steps to ensure the effective use of human capital flexibilities.* As agencies plan how to implement specific workforce strategies that include human capital flexibilities, they also need to consider other practices that are important to the effective use of flexibilities. For example, it is important for an agency to

- properly train managers and supervisors to identify when flexibilities can be used and how to use the agency’s processes for ensuring consistency, equity, and transparency;
- hold managers and supervisors accountable for the fair and effective use of these flexibilities;
- educate employees about how the agency uses human capital flexibilities; and
- streamline and improve administrative processes for using flexibilities and review self-imposed constraints that may be excessively process oriented.

*Monitor and evaluate progress toward achieving workforce planning and strategic goals.* Agencies’ monitoring and evaluation of their efforts to achieve their workforce planning and strategic goals are critical to effective workforce planning. An agency’s evaluation could help determine whether the agency is meeting its workforce planning goals and identify the reasons for any shortfalls. For example, a workforce plan can include measures that indicate whether the agency executed its hiring, training, or retention strategies as intended and achieved its goals for these strategies.

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## Federal Agency Budget Formulation and Allocation

The federal budget process involves many steps, including the agencies' formulation of their budget requests and subsequent allocation of the funds that Congress appropriates to them.<sup>14</sup> The federal government assembles an annual budget in a long administrative process of budget preparation and review. This process begins one or more years before the budget for a particular fiscal year is ready to be submitted to Congress. The agencies and their individual organizational units formulate the budget by reviewing current operations, program objectives, and future plans, and preparing budget estimates for upcoming fiscal years. The Office of Management and Budget (OMB) within the Executive Office of the President oversees and coordinates formulation of a consolidated budget request for the federal government, which the President submits to Congress by the first Monday in February. Congress reviews the President's budget request and appropriates funds to federal agencies for specific purposes. Once agencies' funds are appropriated by Congress and apportioned to them by OMB, it is the responsibility of the individual agencies to allocate their funds within their agencies based on OMB and congressional direction.

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## Interior, EPA, and the Forest Service Vary in Their Approaches to Workforce Planning

Interior, EPA, and the Forest Service have taken different approaches to workforce planning. Interior bureaus each receive their own appropriations and have missions that require workforce plans to be developed at the bureau level rather than at the departmentwide level. EPA issued an agencywide workforce plan in fiscal year 2006 that provided guidance to regional and program offices when developing their own plans. Since establishing a new approach to agencywide workforce planning in 2007, the Forest Service has annually developed agencywide workforce plans using information from its units.

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## Interior's Workforce Planning Occurs at the Bureau Level

According to Interior, its eight bureaus were established under enabling legislation, and each receives its own appropriations and has missions that require workforce plans to be developed at the bureau level rather than at the departmentwide level. The Office of the Deputy Chief Human Capital Officer provided guidance to the bureaus, in the form of a workforce planning template, on how to prepare workforce plans for fiscal years

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<sup>14</sup>For a detailed description of the federal budget process, see GAO, *A Glossary of Terms Used in the Federal Budget Process*, Appendix I: Overview of the Development and Execution of the Federal Budget, [GAO-05-734SP](#) (Washington, D.C.: September 2005).

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2008 through 2013.<sup>15</sup> We found that the bureau plans generally followed the format described in the template, which directs bureaus to include the following information:

- the bureau’s mission,
- a description of how the workforce plan is integrated with Interior’s Strategic Plan,
- a description of the bureau’s workforce profile,
- the mission challenges facing the bureau,
- the bureau’s workforce needs, including contractors and volunteers as appropriate,
- plans and solutions to meet the bureau’s workforce and skill needs,
- resource and investment needs, and
- any additional information needed to support the bureau’s analyses.

Interior officials told us that when the agency issues its revised strategic plan, for which a proposed framework was out for public comment in the fall of 2009, the bureaus would revise their workforce plans to reflect changes in the agency’s strategic goals.

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### EPA’s 2006 Workforce Plan Provided Guidance to Regional and Program Offices for Developing Their Own Plans

EPA’s Office of Human Resources developed EPA’s first strategic workforce plan in fiscal year 2006, with the intent of updating it after revising the agency’s strategic plan. The purpose of the workforce plan was to provide guidance to regional and program offices, which are responsible for developing their own plans.<sup>16</sup> The workforce plan projected changes in the agency’s core functions from 2005 through 2008. For example, the plan estimated that there would be a reduced emphasis on the core function of developing regulations but an increased emphasis on other functions, such as homeland security and research and

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<sup>15</sup>With the exception of the Bureau of Reclamation’s workforce plan, which covers fiscal years 2008 through 2012, the time frames of the other seven bureau plans are consistent with this guidance and cover fiscal years 2008 through 2013.

<sup>16</sup>Regional and program office workforce planning was beyond the scope of our work.

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development. However, the plan does not include information on contractors because OMB did not provide explicit instructions to include them, according to EPA officials.<sup>17</sup> The plan has not been updated since 2006, but agency officials told us that they expect a new workforce plan will be completed after EPA develops its next strategic plan in 2010.

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**Forest Service Annually Issues a 5-Year Agencywide Workforce Plan Using Standard Information from Its Regions, Stations, and Other Units**

The Forest Service began its current agencywide workforce planning process in fiscal year 2007 with the creation of its Workforce Planning and Program Analysis Branch. In leading the agency's workforce planning, this branch annually develops an analysis of the agency's workforce and issues a 5-year plan for the agency's permanent workforce; agency officials told us that the analyses and plans are posted on the agency's Web site and were announced through a letter to certain leaders.<sup>18</sup> In October 2009, the branch also began to produce certain workforce-related statistics on a monthly basis, which officials told us the branch plans to summarize quarterly.<sup>19</sup>

The annual workforce analysis provides information on the composition of the agency's workforce nationwide. The workforce analyses and plans do not include information on contractors; agency officials told us that this information is not included because the Forest Service cannot accurately track the FTE hours of contractors. According to the 5-year workforce plan for 2009 through 2013, the 5-year plan complements the analysis by identifying occupation-specific hiring, diversity, and competency needs across the agency, and by serving as a guide for the agency's recruitment, succession planning, and training programs, among other things. In addition, the agency's workforce plans for 2008 through 2012 and 2009

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<sup>17</sup>EPA officials said they will be providing more information on non-FTEs in the next workforce plan as part of OMB's Acquisition and Contracting Improvement Plans and Pilots announced in December 2009.

<sup>18</sup>These leaders comprised the agency's regional foresters, station directors, Director of the Northeastern Area, Director of the International Institute of Tropical Forestry, deputy chiefs, and Washington Office directors.

<sup>19</sup>For example, these statistics include the percentage of permanent employees eligible to retire; total attrition; the number of employees that have completed certain courses or are enrolled in certain leadership development programs; the number of employees at grade levels 14 or 15 or within the Senior Executive Service; the percentage of permanent positions or new hires that are filled by women, veterans, persons with certain disabilities, or African American, Native American, Asian/Pacific Islander, or Hispanic employees; and the number or percentage of new employees hired through sources outside the federal government.

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through 2013 include recommendations for agency actions in a variety of workforce planning areas.

The plans are based on information collected from the Forest Service's 24 units—including each of the agency's nine regions, seven research stations, and several Washington offices—using standardized templates.<sup>20</sup> According to workforce planning officials, the units are not required to include temporary employees in the information provided via their templates. These templates collect information in five areas: (1) reorganization or consolidation; (2) training and succession planning; (3) sourcing options;<sup>21</sup> (4) workforce adjustments, such as buyouts and early-out retirements; and (5) recruitment for professional, administrative, and technical occupations that are considered mission-critical. Some sub-units, such as national forests, may also complete workforce planning templates that feed into the larger planning effort. While the Forest Service has agencywide workforce planning analyses and plans, the agency considers workforce planning to be the responsibility of unit-level managers. Therefore, field units—such as regions and forests—are primarily responsible for workforce planning and may conduct their own additional workforce planning activities.<sup>22</sup>

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## Agencies Vary in the Extent to Which They Incorporate Leading Workforce Planning Principles

Interior, EPA, and the Forest Service differ in the extent to which they have incorporated the six leading workforce planning principles, but they generally do not link their workforce plans to their strategic plans and do not monitor and evaluate their workforce planning efforts. With regard to linking workforce plans to budget formulation, the Forest Service recently began to formally link the two, but Interior and EPA do not. The three agencies vary in the extent to which they involve top managers and others in developing workforce plans. The agencies have all taken some steps to

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<sup>20</sup>The 24 units include the following: Northern Region (Region 1); Rocky Mountain Region (Region 2); Southwestern Region (Region 3); Intermountain Region (Region 4); Pacific Southwest Region (Region 5); Pacific Northwest Region (Region 6); Southern Region (Region 8); Eastern Region (Region 9); Alaska Region (Region 10); Rocky Mountain Research Station; Northern Research Station; Pacific Northwest Research Station; Pacific Southwest Research Station; Forest Products Laboratory; Southern Research Station; International Institute of Tropical Forestry; Northeastern Area; Office of the Chief; Business Operations; National Forest System; Chief Financial Officer; Research and Development; State and Private Forestry; and Law Enforcement and Investigations.

<sup>21</sup>These options are supplements to the permanent workforce, such as volunteers.

<sup>22</sup>Workforce planning activities at the units were outside the scope of this review.



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analyze their workforce, including identifying mission-critical occupations, which form the basis for much of the agencies' workforce planning. With regard to addressing workforce gaps, such as gaps in staffing levels, critical skills, and competencies, all three agencies identified some strategies or initiatives that are either under way or being considered. The three agencies vary in the actions they have taken to support their workforce planning efforts through the effective use of human capital flexibilities.

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### Agencies Generally Did Not Align Workforce and Strategic Plans and Differ in Whether They Link Workforce Plans with Budget Formulation

At Interior, workforce plans for three of its eight bureaus (Bureau of Land Management, Indian Affairs, and the U.S. Geological Survey) describe how they link to one or more departmentwide mission goals identified in the department's strategic plan and analyze the department's workforce needs in these areas. For example, the Bureau of Land Management's workforce plan links to four of Interior's strategic mission goals—Resource Protection, Resource Use, Recreation, and Serving Communities—and the workforce plan includes an appendix that describes the bureau's current workforce profile and makes projections out to fiscal year 2013 for each goal. Similarly, Indian Affairs identifies the Serving Communities mission goal in its workforce plan and focuses on its Safe Indian Communities and Indian Education initiatives in fulfilling this mission. In contrast, other bureaus' workforce plans state that they were linked to Interior's strategic plan, and in one case identified specific mission goals, but none explicitly align their workforce planning effort and analysis with such goals. While three of the bureaus' plans illustrate explicit linkages to strategic mission goals, none of the eight bureaus' plans describe links to specific outcome measures. However, Interior's strategic plan contains three workforce-related outcomes, including one on the percentage of skill gaps that are closed across the department's workforce. Additionally, while the bureaus' workforce plans generally do not include formal links to the budget formulation process, we found that bureaus generally requested funds in their fiscal year 2010 budget justifications to implement elements of their workforce plans. Specifically, bureaus requested funding in areas of workforce planning policy and administration, as well as leadership development, equal employment opportunity offices, and succession planning. For example, the Fish and Wildlife Service requested \$12.65 million, and received \$13.15 million, for its youth and careers in nature program, designed to reach out to young people to encourage them to enter public service as natural resource professionals.

EPA's workforce plan is not clearly aligned with the agency's strategic plan or budget formulation. The workforce plan does not show how FTEs,

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skills, and locations will be aligned with the strategic plan or budget. Only one page in the workforce plan refers to the strategic plan, and the plan has no references to the budget. Furthermore, we found the strategic plan and the 2009 through 2014 Strategic Plan Change Document for Public Review do not refer to the workforce plan and the budget only briefly refers to the workforce plan in the fiscal year 2010 Congressional Justification. The 2006 through 2011 strategic plan included a human capital section for each of the five strategic goals that identified some future staff skill needs and, in some cases, recruiting strategies to fill those gaps, but it did not include any expected measurable workforce outcomes. Furthermore, the strategic plan included a discussion of strategies, including human capital, that applied to more than one goal. However, the human capital section of the plan did not include the expected measurable workforce outcomes. In 2005, we reported that EPA's process for budgeting and allocating resources did not fully consider the agency's workload, either for specific statutory requirements such as those included in the Clean Water Act or the broader goals and objectives in the agency's strategic plan.<sup>23</sup> We reported that any efforts made by the agency to develop a more systematic process would be hampered by the lack of comprehensive and accurate workload data.

The Forest Service has not clearly aligned its workforce plans and strategic plan for fiscal years 2007 through 2012;<sup>24</sup> however, the agency has recently begun to formally link workforce planning and budget formulation. The Forest Service's workforce plans for 2008 through 2012 and for 2009 through 2013 state that they link to goal 5 in the agency's strategic plan—"Maintain Basic Management Capabilities of the Forest Service"—but we found that this statement is the only reference in the plans to specific strategic goals.<sup>25</sup> In addition, OPM's Human Capital Assessment and Accountability Framework, which provides guidance to agencies on human capital management and planning, indicates that agencies should integrate workforce planning into their strategic plans. However, we found that workforce planning is not fully integrated into the Forest Service's strategic plan. Specifically, for each goal, the plan

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<sup>23</sup>GAO, *Clean Water Act: Improved Resource Planning Would Help EPA Better Respond to Changing Needs and Fiscal Constraints*, [GAO-05-721](#) (Washington, D.C.: July 22, 2005).

<sup>24</sup>Forest Service, *United States Department of Agriculture Forest Service Strategic Plan: FY 2007-2012* (July 2007).

<sup>25</sup>Forest Service, *Forest Service Workforce Plan 2008-2012* (Feb. 29, 2008) and *Forest Service Workforce Plan 2009-2013* (Sept. 26, 2008).

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identifies the following elements: an overall outcome, objectives, performance measures and targets, and means and strategies for accomplishing the goal. While most of the means and strategies for accomplishing goal 5 of the strategic plan are associated with workforce planning, neither the objectives nor the performance measures and targets for goal 5 are linked to workforce planning. Forest Service workforce planning officials told us that linkage has not occurred because the current strategic plan was developed in 2006, before the agency's Workforce Planning and Program Analysis Branch and the current agencywide workforce planning process were established in 2007. The officials said that the Forest Service will be developing its next strategic plan during fiscal year 2010 and that they will be involved in this process, although the specific nature of this involvement has not yet been determined.

With regard to linking workforce plans to budget formulation, the Forest Service began to formally link the two in 2008 through its Budget Performance Integration initiative. This initiative involves developing business plans that provide guidance to the agency on implementing each of the goals in the strategic plan. According to agency officials, the business plans deal with the direction the budget should take and are used in formulating the agency's budget requests. Starting with the fiscal year 2011 budget formulation process, which began in October 2008, officials from the Workforce Planning and Program Analysis Branch participated in the business plan development. At that time, the Forest Service also aligned the timing of the workforce planning and budget cycles, according to agency officials. By doing this, the teams developing the business plans would have workforce planning information for use in developing the business plans, according to agency officials. Our review of the fiscal year 2011 business plans indicated that these business plans incorporated workforce planning information. Specifically, among other things, the plans identified workforce-related trends that can hinder the agency's ability to meet its strategic goals, as well as workforce development needs that require support from the Forest Service's Human Resources Management office.

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### Agencies Vary in the Extent to Which They Involve Top Management and Others in Developing Workforce Plans

To develop their workforce plans, most Interior bureaus involve top management, and some bureaus assemble teams of senior managers and program staff, as well as officials responsible for human resources and budgets. However, it is unclear whether the bureaus consistently involve employees and other stakeholders. For example, the Bureau of Reclamation directed its Managing for Excellence Team to develop the bureau's workforce plan. The team included high-level officials, managers,

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and staff from each of the bureau's regions and offices. It also solicited public and stakeholder feedback at a public meeting in September 2006. In addition, the Bureau of Land Management's plan was a collaborative effort among the bureau's Human Capital Management Team in the Washington Office; field committee; human resource officers; and leadership in the state offices, centers, and the Washington Office. Officials from other bureaus told us that they use feedback from employee surveys and provide employees an opportunity to comment on the draft plans. For example, the Fish and Wildlife Service held listening sessions and surveyed employees to obtain their views. The director's office also sent an e-mail to all employees to inform them of the workforce planning process, and the Human Resource Office provided information to employees on the planning process.

EPA human resource officials told us that top managers were involved in developing the agency's workforce plans and selected employees were involved to some extent. In addition, EPA officials said the agency had extensive union involvement with the implementation of the plan, particularly assessments of the competencies of mission-critical occupations. However, officials said consultation with the unions in the selection of mission-critical occupations would be inappropriate, as the mission of the unions does not impart any relevant expertise on this question. Furthermore, EPA officials stated that formal union engagement is not relevant to describe the level and extent that EPA involved management and staff, and the agency does not believe union involvement, in contrast to management and employee involvement, in the development of workforce plans would be appropriate or useful. Officials from the union representing the majority of EPA's bargaining unit said their union was not involved in assessing competencies and that they should have been involved in developing the workforce plan.

Executive leaders at the Forest Service have generally not been involved in setting the direction for the workforce plan,<sup>26</sup> and selected employees were involved to some extent. The executive leaders we spoke with were also not familiar with the plan, including its recommendations. Nevertheless, they expressed their support for agencywide workforce planning efforts and were concerned about how the agency plans to

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<sup>26</sup>The Forest Service's Executive Leadership Team, which we refer to as the agency's executive leaders, comprises the Chief of the Forest Service; Associate Chief; Chief of Staff; Chief Financial Officer; and the Deputy Chiefs of Business Operations, National Forest System, Research and Development, and State and Private Forestry.

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handle specific workforce planning issues, such as succession planning and diversity. Employee involvement in developing the agencywide plan occurs through small teams in the Forest Service's 24 units that are responsible for completing the templates used to develop the plan. According to officials from the Workforce Planning and Program Analysis Branch, each Forest Service unit's workforce team must include at least the unit leader, such as the regional forester or station director, who is responsible for ensuring completion of the unit's template; the unit's civil rights representative; a budget officer; and a human resources liaison. In addition, employees at some sub-units, such as the national forests, may be involved in completing templates.

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## Agencies Have Taken Some Steps to Analyze Their Workforce

### Interior

At Interior, bureaus have taken an array of actions to analyze their workforce, an essential step to achieve their missions and goals. Specifically:

- Workforce plans for each bureau identify mission-critical occupations, although the plans vary in the extent to which the occupations are categorized. For example, some plans identify bureau-specific, mission-critical occupations, while others, such as the Bureau of Land Management, also include Interior-wide and OPM mission-critical occupations. In its analysis, the Bureau of Land Management identifies expected changes because of attrition and retirement and evaluates its need to expand the pool of staff to meet future workforce needs.
- All the bureaus identify workforce challenges in their workforce plans to a varying extent. Some bureaus provide specific challenges critical to their mission. For example, Indian Affairs thoroughly details, among others, the challenges it faces in confronting increasing drug use and violence in Indian communities and recommended approaches to addressing these challenges. Other bureaus describe broader short- and long-term mission challenges, such as the loss through retirement of valuable institutional knowledge at the Fish and Wildlife Service and the use of new technologies to monitor environmental change.
- Most bureaus identify workforce gaps, such as gaps in leadership or talent. For example, the Office of Surface Mining Reclamation and Enforcement identifies gaps that could result because almost half of its workforce will be eligible for retirement in 2013. Additionally, the bureau plans to identify

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skill gaps and use tools like relocation and retention allowances to promote position retention.

- Some bureaus identify needed competencies and skill levels. For example, the U.S. Geological Survey identifies both needed competencies, such as working collaboratively and effectively addressing problems, and skill levels ranging from entry level to senior science and management levels.
- Some bureaus identify positions to streamline or eliminate, although they are not required to do so. For example, the Bureau of Reclamation's plan includes "position elimination factor" calculations, which considered succession rates and critical skill and competency needs, resulting in the potential to eliminate 159 positions in the 12 to 36 months following the creation of the plan.
- Some bureaus consider diversity, as well as generational needs, in their workforce plans. For example, the National Park Service plan states that accomplishing its goals requires the service to have a diverse, highly skilled workforce. Accordingly, the plan tracks employee diversity through numerous workforce characteristics, including race, gender, and disability status. The U.S. Geological Survey uses generational analysis to develop employee programs, such as family-friendly programs and alternative work schedules, to meet the expectations of the younger workforce and attract and retain quality employees who will move into higher-level positions.

## EPA

EPA has identified competency gaps in its mission-critical occupations. In preparation for the 2006 strategic workforce plan, EPA conducted a series of interviews with senior agency officials that focused on the current and future missions of their respective offices and their core missions and major work areas. The agency analyzed the results of the interviews to identify the mission-critical occupations and the skills and competencies needed for those occupations. In 2006, the agency identified 19 such occupations. Among the 19 occupations, agency officials considered the highest-priority occupations to be (1) information technology specialists, (2) human resource specialists, (3) Senior Executive Service leaders, (4) grant specialists, (5) contract specialists, and (6) toxicologists. By 2009, EPA had completed competency assessments for 12 priority mission-critical occupations. According to the agency's 2009 *Human Capital Management Report*, these assessments did not generally identify any significant competency gaps, which indicated a seasoned, professional workforce well-positioned to meet mission requirements.

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However, we have reported that EPA has not comprehensively analyzed its workload and workforce since the late 1980s to determine the optimal numbers and distribution of staff agencywide. In 2001, we reported that an organization within EPA deployed its workforce on the basis of outdated workload models and did not consider current workload information such as the increased role states assumed over the years in environmental enforcement.<sup>27</sup> In 2005, we reported that EPA's process for allocating resources involved making annual incremental adjustments and relied primarily on historical precedent. We also reported that EPA did not have a system in place to conduct a review of the nature or distribution of its current workload, which has changed over time as EPA has taken on new responsibilities under the Clean Water Act and other laws and the states have gradually assumed a greater role in the day-to-day implementation of key aspects of this workload. We specifically recommended in 2005 that EPA focus its efforts on a ground-level assessment and (1) identify key workload indicators that drive resource needs, (2) ensure that relevant data are complete and reliable, and (3) use the results to inform the agency's resource allocations. In 2008, we noted that the agency's approach in its operating plan for allocating its workforce among its regional offices had not substantially changed since our 2001 and 2005 reports.<sup>28</sup> In 2009, EPA officials told us the only workload analysis that they had conducted in recent years was an examination of the workload for the Superfund program completed in 2008. The resulting report said it remained a challenge to manage the expectations for the Superfund program under the allocation of personnel at the time. One finding in the report was that, "...given the allocation of work years, the time required to complete the remedial portion of the program for national priority sites was likely to be in excess of 70 years and well beyond the expected planning horizon for many sites." Officials stated that they used the analysis in some instances to divert efforts from administrative functions to implementation of the cleanup program, share work among regions, and plan programs. However, the analysis was not used for a centrally managed reallocation effort by the office that manages the Superfund program.

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<sup>27</sup> GAO, *Human Capital: Implementing an Effective Workforce Strategy Would Help EPA to Achieve Its Strategic Goals*, [GAO-01-812](#) (Washington, D.C.: July 31, 2001).

<sup>28</sup> GAO, *EPA's Execution of Its Fiscal Year 2007 New Budget Authority for the Enforcement and Compliance Assurance Program in the Regional Offices*, [GAO-08-1109R](#) (Washington, D.C.: Sept. 26, 2008).

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In responding to our 2008 correspondence, EPA stated that it recognized the need to improve its ability to understand and quantify the relative workload of its component organizations and to make allocation decisions based on those assessments. Toward that end, the agency said that it is committed to improving its analytical capabilities and examining appropriate measures of workload to support the resource allocation process. In part, as a response to our recommendations, EPA officials said that they issued a contract in 2009 to explore better ways to assess staff levels for workload shifts. In 2010, the contractor is to survey selected EPA officials to determine the current workload and workforce alignment for functions in six areas: (1) regulatory development, (2) scientific research, (3) enforcement, (4) financial management, (5) environmental monitoring, and (6) permitting.<sup>29</sup>

## Forest Service

The Forest Service has analyzed its workforce and identified mission-critical occupations, and it has taken preliminary steps to identify needed competencies and workforce gaps. Each year since 2007, the Forest Service has conducted a detailed analysis of workforce data in six areas: (1) workforce demographics, such as diversity, attrition, hiring, and the temporary workforce; (2) organizational management, including information on trends related to the budget, how work is assigned, and how organizations and positions are arranged at various levels; (3) recruitment; (4) training and succession planning; (5) workforce adjustments; and (6) sourcing options. In addition, the Workforce Planning and Program Analysis Branch has identified 74 mission-critical occupations. These occupations include 30 professional occupational series, such as general biology and forestry; 22 administrative series, such as program and budget analysts; and 22 technical series, such as forestry and hydrology technicians. The Forest Service's field unit leaders—including regional foresters, station directors, and others—have had opportunities to review and comment on the list of these 74 occupations.

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<sup>29</sup>In 2010 and 2011, the contractor is to compare EPA's data for each function with comparable functions at other agencies. For example, EPA officials said the contractor might compare EPA's permitting function with that of the Corps of Engineers and the National Oceanic and Atmospheric Administration, and EPA regulatory development with the Food and Drug Administration and the National Oceanic and Atmospheric Administration. According to EPA officials, a similar effort by a previous contractor to compare EPA's overall workload assessment efforts was unable to provide actionable information due to the difficulty of comparing workload assessments at agencies with different missions, statutory mandates, and core functions. EPA officials said they expect their current effort to be more successful because it focuses on particular core functions that can be compared with similar functions at other agencies.



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However, the agency's executive leaders have not yet had a role in reviewing the mission-critical occupations identified, although workforce planning officials told us that these leaders will review the list for the 2011 workforce planning cycle. Using agencywide information, the Forest Service has identified agencywide gaps in certain mission-critical occupations—for example, the workforce plan for 2009 through 2013 identified shortages in contracting and archaeology.

The Forest Service has also taken some steps to identify needed competencies for its workforce at all levels but has not yet identified competency gaps. Specifically, the agency has identified the following types of competencies:

- “*Foundational*” competencies. These consist of competencies in two areas—“managing self,” which applies to all employees and includes such competencies as continual learning and interpersonal skills, and “managing projects,” which applies to certain managers and includes team building and accountability.<sup>30</sup>
- “*Leadership*” competencies. These apply to supervisors, managers, and executives and consist of a variety of competencies in four areas—leading organizations and managing people, programs, and performance.<sup>31</sup> Specific competencies include conflict management, financial management, strategic thinking, and facilitating performance.
- “*Technical*” competencies. These competencies apply to specific occupational series. The Forest Service has identified technical competencies for 24 of its 74 mission-critical occupations. In addition, the agency has identified technical competencies for eight occupational series that are not mission-critical because, according to agency officials, these series have direct relationships to other mission-critical occupations. According to an official from the Forest Service's Center of Learning, the center is also working on identifying technical competencies for other occupational series. Although the Forest Service intends to complete this

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<sup>30</sup>According to a Forest Service official, these “foundational” competencies are based on OPM guidance.

<sup>31</sup>According to a Forest Service official, these “leadership” competencies are based on OPM guidance.

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process for all mission-critical occupations, according to agency officials, it does not have a plan for doing so or a strategy to set priorities for addressing additional occupational series.

While the Forest Service has not yet inventoried the competencies of its current employees, and therefore cannot yet identify its competency gaps, an official with the Center of Learning told us that the agency is preparing to launch pilot efforts to assess the foundational and leadership competencies of staff in certain grade levels and occupational series.

Appendix IV provides information on the mission-critical occupations identified by Interior, EPA, and the Forest Service.

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## Agencies Identify Some Strategies to Address Workforce Gaps

At Interior, the bureaus' workforce plans identify a range of strategies to address workforce gaps, such as the use of recruitment and other incentives, training, and succession planning. In terms of recruitment, some bureaus engage in targeted recruitment to attract a skilled, diverse workforce. For example, at Indian Affairs, the bureau works with the tribes and tribal schools and colleges to recruit qualified applicants. In addition, Indian Affairs' recruitment efforts target Native American veterans to fill law enforcement positions, an occupation where the bureau has experienced significant shortages of qualified applicants. Bureaus also use incentive programs to attract and retain highly skilled and qualified employees, although officials in some bureaus said there was seldom enough money for such incentives. For example, the Minerals Management Service uses incentives such as student loan repayments and recruitment and relocation bonuses to help make its openings competitive with the private sector. Bureaus also use training and succession planning to fill workforce gaps. In one instance, the Minerals Management Service paid for an employee's college education to obtain the skills it needed and help retain the employee. The Bureau of Land Management's Executive Leadership Team endorsed the creation of a leadership excellence program as a succession planning strategy to develop new leaders. Although all bureaus identify strategies to fill gaps, the extent to which the bureaus' workforce plans identify how the bureaus will track the implementation of the strategies is unclear. For example, the National Park Service's workforce plan identifies goals and steps to develop and implement a comprehensive leadership management strategy, but it does not address how the bureau will track progress toward implementing the strategy.

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EPA officials said they have closed competency gaps on the six highest-priority, mission-critical occupations using recruitment, restructuring, succession planning, training, and mentoring. None of the gaps were large, according to EPA's 2009 *Human Capital Management Report* to OPM. For example, the agency stated that among contract specialists, the gaps were what EPA termed "medium level gaps" in such competencies as teamwork and project management. For another mission-critical occupation, information technology specialists, the competencies that were improved included risk management and network security. In the same 2009 report to OPM, EPA said it found no gaps in the competencies for the next six priority mission-critical occupations (chemists, biologists, physical scientists, economists, attorneys, and health scientists). Consequently, EPA estimated in the 2008 *President's Management Agenda Human Capital Green Book* that there were no gaps in 62 percent of its mission-critical occupations once the gap analysis and actions to fill gaps were completed on the first twelve mission-critical occupations. While EPA's efforts are a step in the right direction, efforts to close the gaps will remain incomplete without the comprehensive workload and workforce analysis that we recommended in our prior reports, as discussed earlier.

The Forest Service has established several leadership development programs and is developing and implementing several other agencywide initiatives to address workforce gaps. According to an agency official, these leadership development programs are central to its succession planning and include, among other things, a Senior Leader program and a Middle Leader program, for which a pilot was recently completed. The Forest Service is also developing a 5-year recruitment strategy and annual implementation plan, but these are in draft form, and specific responsibilities for implementing this strategy have not yet been assigned. The agency's Center of Learning is developing national strategies to identify and address workforce gaps through its training, employee development, and succession planning initiatives. For example, a Center of Learning official told us that the center is developing and beginning to pilot test a method to identify and deliver targeted training to address any employee competency gaps that may be identified. The Center of Learning is also designing a 5-year implementation plan for its training, development, and succession planning programs. In addition to these efforts, the agency's civil rights office is developing a national diversity strategy.

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## Agencies Vary in the Actions They Have Taken to Support Workforce Planning and Implementation

At Interior, bureaus vary in the extent to which they (1) train managers and provide them with guidance on how to use human capital flexibilities and (2) streamline processes for hiring employees and administering incentive awards. For example, managers at the U.S. Geological Survey are educated on recruitment, retention, and relocation flexibilities during the Supervisory Challenge training class, and the bureau reviews these flexibilities with managers when advertising vacancies. Additionally, the U.S. Geological Survey provides guidance and education on the full range of available flexibilities through the eastern region manager's toolkit, on its Intranet, and at various management conferences. With regard to streamlining processes, the Fish and Wildlife Service implemented OPM's USA Staffing in October 2007 to address hiring challenges, provide timely responses to questions, and assess applicants with multiple levels of review and screening, among other things.<sup>32</sup> In addition to USA Staffing, Fish and Wildlife Service officials also told us they are working to further improve the hiring process by automating the creation of position descriptions. Finally, some bureaus have developed guidance and delegated the use of human capital incentives to field and regional managers.

EPA officials told us the agency supported workforce planning by providing guidance to its regional and program offices on how to develop their individual workforce plans, assess mission-critical competencies, and develop training to address competency gaps. Consequently, human resource officers at various levels of the organization receive training on available flexibilities, according to EPA's Acting Deputy Director, Office of Human Resources. In addition, the acting deputy director said information on these policies is available agencywide on the EPA Intranet. Also, most flexibilities are covered by guidance and forms used by the agency's hiring managers. Furthermore, human capital objectives are included in Senior Executive Service performance contracts, according to the acting deputy director.

According to the Forest Service's workforce plan for 2009 through 2013 and 2009 workforce analysis, the Forest Service has underused recruitment, retention, and relocation incentives. According to Forest Service human resources officials, the Human Resources Management

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<sup>32</sup>USA Staffing is a Web-based system that automates the public sector staffing process through Web-enabled software that automates the recruitment, assessment, referral, and notification processes.

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office is collecting data on these incentives, which it may use to develop improved guidance for managers on how to use them. The Forest Service provides employees with information about the variety of human capital flexibilities available, such as work-life programs and incentive awards, through several means, including the agency's Intranet and a monthly human resources newsletter. Officials told us that the agency is also considering how to streamline its communications and improve management's knowledge of available flexibilities. While information on flexibilities has been provided, managers, such as regional foresters, are not formally held accountable—for example, through their performance expectations—for fair, transparent, or effective use of the agency's various flexibilities, according to Forest Service officials.

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### Agencies Generally Do Not Monitor and Evaluate Progress in Workforce Planning

Workforce plans for three of Interior's bureaus—the Bureau of Land Management, the U.S. Geological Survey, and the Office of Surface Mining Reclamation and Enforcement—describe the steps that would be used to measure the outcomes of the workforce strategies they implement. For example, the Bureau of Land Management states in its workforce plan that it would report progress on both a quarterly basis, and on an annual basis, to determine if the actions taken are changing trends in its workforce. Additionally, the bureau's plan states that the bureau will analyze results from OPM's Fiscal Year 2008 Federal Human Capital Survey to determine whether it is making progress in becoming a "Best Place to Work."<sup>33</sup> The Bureau of Land Management's workforce plan also states that the bureau will update the plan as needed to ensure it is relevant and reflects Interior's and the bureau's strategic goals and objectives; however, bureau officials could not provide us with any progress reports or an updated plan. Management teams at the U.S. Geological Survey also use OPM's Federal Human Capital Survey, in addition to a bureau-specific survey called the Organizational Assessment Survey, to evaluate organizational excellence, develop strategies, and identify actions to advance Interior's strategic plan. According to the survey, from 2002 to 2007, the bureau experienced an 8-percent increase in employees' perceptions of the U.S. Geological Survey as a rewarding place to work. The workforce plans of the remaining five bureaus do not discuss steps that could be used to

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<sup>33</sup>The Federal Human Capital Survey is a tool that measures employees' perceptions of whether, and to what extent, conditions characterizing successful organizations are present in their agencies. Survey results provide insight into the challenges agency leaders face in ensuring the federal government has an effective civilian workforce and how well they are responding.

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measure their progress in implementing the various strategies they have identified.

EPA has not comprehensively monitored and evaluated the results of its workforce planning efforts, including whether its workforce planning contributes to the agency's strategic planning goals. Since 2007, EPA has focused more on evaluating the workforce planning efforts of its 10 regions, rather than its 13 program offices. However, according to agency officials, EPA has annually collected information on workforce planning from regions and program offices for reports to OPM. We found that a comprehensive agencywide evaluation was incomplete, since a compilation of the data call for 2007 showed that many offices did not respond to all of the questions they were asked.

The Forest Service does not have a process to implement the recommendations in its agencywide workforce plans and has not established a process to evaluate its workforce planning. Specifically, the Forest Service does not have a process to communicate the workforce plans' recommendations, assign responsibilities or establish time frames for implementing them, or track their implementation. For example, the 2009 through 2013 plan includes a recommendation that the leadership determine the optimum number of employees necessary to meet the agency's mission and objectives, but the leaders we contacted had limited knowledge about this plan or its recommendations. Furthermore, for some of the plans' recommendations, it is not clear who is responsible for implementing them. For example, the 2009 through 2013 plan recommends developing an agency mentoring protocol but does not specify who or what organization would be responsible for doing this. We also found that the Forest Service has not evaluated its workforce planning, except to request a study to evaluate its diversity initiatives. Specifically:

- The Forest Service's *Annual Performance Report* for fiscal year 2008 did not analyze the contributions of workforce planning toward achieving the agency's strategic goals because workforce planning is not fully integrated into the agency's strategic plan.<sup>34</sup>

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<sup>34</sup>The Forest Service's fiscal year 2008 *Annual Performance Report* is contained in the agency's 2010 budget justification. The report presents the plans and accomplishments that contribute to the agency's strategic goals and objectives. It analyzes program performance at the strategic goal level and serves as the agency's Government Performance and Results Act *Annual Performance Report* for fiscal year 2008.

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- Although the agencywide workforce plans and analyses indicate that measurement systems and metrics to track workforce planning accomplishments are in place, we found that the Workforce Planning and Program Analysis Branch had not established such a process; however, it recognizes it needs to do so. Furthermore, the workforce plans state that the Workforce Planning and Program Analysis Branch will track the agency's progress in implementing the recommendations made in the workforce plans, but we found that the branch has not yet started this activity.
  - The Forest Service has not evaluated specific workforce planning efforts, such as its recruitment strategies and plans or training and employee development programs. However, an official told us that the Center of Learning was developing an evaluation of its Senior Leader Program.
  - The Forest Service recently requested that the National Academy of Public Administration evaluate the agency's diversity initiatives, with the goals of identifying which programs are (1) operating effectively, (2) achieving moderate success, or (3) ineffective and should be eliminated. The resulting report, issued in 2009,<sup>35</sup> stated that the Forest Service was unable to provide adequate program data, metrics, and cost data needed for the evaluation requested; however, the academy offered several recommendations for strengthening the Forest Service's diversity initiatives.

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## Agencies Do Not Directly Link Their Workforce Planning with Budget Allocation

Interior, EPA, and the Forest Service have not directly linked their workforce planning efforts with their budget allocation processes. Specifically, we found that the Interior bureaus' workforce plans do not systematically link to budget allocation processes, and the bureaus generally do not track how program officials use these plans to allocate funds. However, officials in some bureaus reported that unit and program officials use workforce plans to distribute staff geographically, share skills within the bureau, or adjust workloads to match available funding. For example, the Fish and Wildlife Service is developing a competency inventory to determine how it can borrow resources across the service's regions and offices to respond to changes in the funding it receives. Such a competency inventory could enable the Fish and Wildlife Service to, for

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<sup>35</sup>National Academy of Public Administration, *A Report by a Panel of the National Academy of Public Administration for the USDA Forest Service: A Program Review of Diversity Strategic Initiatives* (Washington, D.C., 2009).

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example, temporarily relocate a hydrologist from one region to another to meet a pressing need that was not funded.

At EPA, the agency does not directly link workforce planning with its annual budget allocation process. EPA's process for allocating resources involves making annual incremental adjustments and relies primarily on historical precedent. Specifically, the agency bases budget decisions on marginal changes to prior year budgets that occur in response to (1) direction from OMB and Congress and (2) spending caps imposed by EPA management. EPA officials said the agency recently provided funds for additional FTEs and associated payroll to support significant enhancements to EPA's High Production Volume Chemicals Program, but they did not provide other examples that would indicate a significant departure from their incremental approach.

Finally, at the Forest Service, budget allocation guidance documents do not mention workforce planning directly. However, according to its executive leaders, the agency links workforce planning with budget allocation to some extent. Specifically, these officials said that this linkage begins during the agency's budget formulation process at the unit and program levels and continues during the annual budget allocation process. As part of the agency's budget formulation process, units provide information to executive leaders on their unit's capabilities to meet programmatic and strategic goals. Although these "capability responses" do not necessarily explicitly link to workforce planning, executive leaders told us that the units and individual programs take workforce capabilities into account in preparing these capability responses.<sup>36</sup> After the Forest Service leadership proposes its annual budget allocation, the units have an opportunity to revisit their capability responses in providing feedback on the proposed budget allocation. However, they added, the final allocation is mostly based on historical levels and represents only limited, incremental shifts from the previous year. Major changes must be planned several years in advance through the budget formulation process. Moreover, Forest Service officials told us that the agency does not typically have a need to shift people and dollars between budget line items

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<sup>36</sup>In addition, as previously noted, the Forest Service began to formally link agencywide workforce planning with budget formulation during the formulation of the fiscal year 2011 budget process—specifically, by involving the Workforce Planning and Program Analysis Branch in the budget formulation process and aligning the timing of the workforce planning and budget cycles.



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from year to year and has the flexibility to address some needs through temporary employees and contractors.

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## Conclusions

With a total of about 121,000 employees nationwide, as well as contractors and volunteers, Interior, EPA, and the Forest Service face a daunting challenge: to effectively manage their workforces to achieve their agencies' missions. To their credit, the agencies have begun to focus attention on the need to use strategic workforce planning to carry out current programs and to address new and emerging tasks. Although the agencies continue their efforts to better incorporate the principles for workforce planning, their efforts have particularly fallen short in two of the six leading principles that we and others have identified as important to effective workforce planning: (1) aligning the agency's workforce plan with its strategic plan and (2) monitoring and evaluating their workforce planning efforts. Until Interior, EPA, and the Forest Service more clearly align their workforce plans with their strategic plans and monitor and evaluate their progress, they are at risk of not having the appropriately skilled workforce they need to effectively achieve their missions.

Furthermore, specifically at the Forest Service, we found that the agency has developed and issued annual workforce plans that contain important information about current and emerging workforce issues and has identified a variety of recommendations to address these issues. However, the agency has not fully taken advantage of these efforts because it has not communicated the recommendations or assigned responsibility for implementing them, nor has it established time frames for implementation. We believe that without appropriate processes for communicating, implementing, and tracking these recommendations, the agency may miss opportunities to address the workforce needs identified in the plans and will not be able to ensure that appropriate steps have been taken.

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## Recommendations for Executive Action

To ensure that Interior, EPA, and the Forest Service more fully incorporate leading workforce planning principles into their workforce planning efforts, we recommend that the Secretary of the Interior, the Administrator of EPA, and the Secretary of Agriculture, through the Chief of the Forest Service, take the following two actions:

- Incorporate into their agency's workforce plans clear and explicit links between the workforce plans and the strategic plan, and describe how the workforce plans will help the agency achieve its strategic goals.

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- Establish mechanisms that their agency can use to monitor and evaluate the effectiveness of its workforce planning efforts, particularly in achieving the agency's strategic goals.

To further capitalize on the Forest Service's existing workforce planning efforts, we also recommend that the Secretary of Agriculture, through the Chief of the Forest Service, establish processes for (1) communicating the recommendations in the agency's annual 5-year workforce plans; (2) assigning responsibility and establishing time frames for implementing the recommendations; and (3) tracking implementation of the recommendations.

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## Agency Comments and Our Evaluation

We provided a draft of this report to Interior, EPA, and the Forest Service for their review and comment. Interior provided a technical comment, which we incorporated into our report.

In commenting on the report draft, EPA recognized the need to continue to address its human capital issues in carrying out its mission to protect human health and the environment. However, EPA stated that we did not fully illustrate the tools that it uses to manage its workforce effectively and that it would welcome the opportunity to work further with us to provide specific examples. During the course of our review, we had many discussions with EPA officials regarding EPA's workforce management activities, and we believe that our report accurately reflects EPA's overall activities to manage its workforce. With respect to our recommendations, EPA agreed with the principles underlying our recommendations, but disagreed with a word in one recommendation. Specifically, EPA suggested removing the word "explicit" from our recommendation that the agencies incorporate into their workforce plans clear and explicit links between their workforce plans and strategic plan. As we pointed out in the draft report, EPA referred to the strategic plan only once in its 2006 strategic workforce plan. We have not made this change to the recommendation because we continue to believe that EPA needs to provide more explicit links between its workforce plan and the goals of its strategic plan. Regarding our recommendation that the agencies establish mechanisms for monitoring and evaluating the effectiveness of workforce planning efforts, EPA asked for specific examples of mechanisms used by other federal agencies. During the course of our review, we provided EPA with a copy of our report describing leading principles of workforce planning, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, and referred officials to other related GAO reports. EPA also pointed out that its strategic plan included sections that

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identified future staff skill needs and recruiting strategies. We added EPA's comments to our report.

EPA also stated that it evaluates agency workforce planning efforts in a program approved by OPM, and that it disagreed with our statement that it does not directly link workforce planning with its annual budget process, and provided one example in which it has done so.<sup>37</sup> We did not revise the report in response to these comments because (1) EPA's evaluation did not include all regions and program offices and therefore was not comprehensive, and (2) our analysis indicates that EPA's workforce planning process and budget allocation are not clearly linked, although there may be some individual cases in which linkages may exist. In addition, EPA took issue with our statement that the agency is at risk of not having an appropriately skilled workforce to effectively achieve its mission if it does not more clearly align the workforce with strategic planning. EPA cited its history of mission success and high marks received from OMB and OPM on strategic human capital management. While we recognize that EPA has made progress, our past work has called for improvements in EPA's workforce management activities that have not yet been fully implemented. We continue to believe that further improvements are necessary to link EPA's strategic planning with workforce planning to better ensure the agency has the right number of people, with the right skills, at the right locations to ensure the success of its mission. EPA also provided other technical comments, which we incorporated as appropriate. EPA's comments on our report draft are provided in appendix V.

The Forest Service generally agreed with the report's findings and conclusions and stated that it has begun working on some aspects of one of our recommendations. Specifically, the Forest Service stated that it is working on communicating the Forest Service's workforce plans' recommendations and assigning responsibility for their timely implementation. The Forest Service also provided technical comments, which we incorporated, as appropriate. The Forest Service's comments on our report draft are provided in appendix VI.

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<sup>37</sup>EPA also referred to two examples of changes in FTEs among its many programs in its fiscal year 2011 budget request, but we described an agency's budget allocation in our report as a process that occurs after Congress appropriates the funds and OMB apportions them. This process has not occurred for fiscal year 2011.

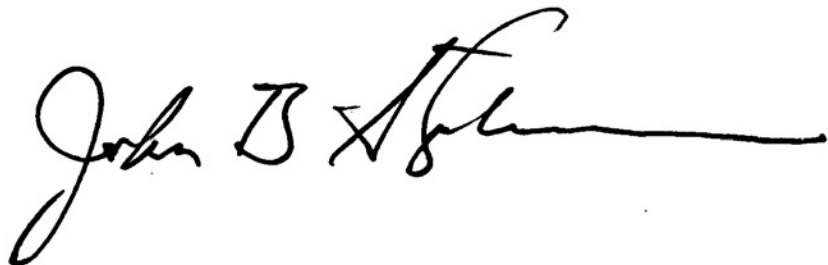
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We are sending copies of this report to interested congressional committees; the Secretaries of the Interior and Agriculture; Administrator of the Environmental Protection Agency; Chief of the Forest Service; and other interested parties. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staffs have questions about this report, please contact us at (202) 512-3841 or [mittala@gao.gov](mailto:mittala@gao.gov) or [stephensonj@gao.gov](mailto:stephensonj@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix VII.



Anu K. Mittal  
Director, Natural Resources and Environment



John B. Stephenson  
Director, Natural Resources and Environment

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# Appendix I: Briefing Slides

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## **Workforce Planning at Interior, EPA, and Forest Service**

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**Briefing to the Subcommittees on Interior,  
Environment, and Related Agencies  
Committees on Appropriations  
U.S. Senate  
House of Representatives**

**December 2009**

**This briefing is based on preliminary information and is  
subject to revision.**

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## Background

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- Public Law 111-8 – Omnibus Appropriations Act of 2009 mandates GAO to review workforce planning processes.
  - Strategic workforce planning:
    - Aligns an organization’s human capital program with its current and emerging mission and programmatic goals and
    - Develops long-term strategies for acquiring, developing, and retaining staff to achieve programmatic goals.
  - Human capital included on GAO’s high-risk list since 2001 as a cross-cutting federal government issue.
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## Background—Interior

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- Mission: To protect and manage the nation’s natural resources and cultural heritage; provide scientific and other information about those resources; and honor its trust responsibilities.
  - FY 2010 budget request: \$18.2 billion and an estimated \$14.0 billion in receipts.
  - Workforce consists of:
    - About 67,000 full-time equivalent employees, and employees make up almost 55% of budget.
    - Over 200,000 volunteers.
  - About 2,400 locations across 8 bureaus; regional/field structure varies by bureau.
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## Background—EPA

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- Mission: To protect human health and the environment by leading the nation's environmental science, research, education, and assessment efforts.
  - FY 2010 budget request: \$10.5 billion.
  - Workforce:
    - About 17,000 full-time equivalent employees.
    - These employees constitute about 20% of the 2010 budget.
    - About 6,000 contract employees.
  - 10 regions and 13 program offices.
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## Background—Forest Service

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- Mission: To sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations.
  - FY 2010 budget request: \$6.1 billion.
  - Workforce:
    - About 34,000 full-time equivalent employees.
    - Projected personnel and benefits costs constitute 60% of agency's budget.
    - About 70,000 volunteers.
  - 155 national forests within 9 regions; 7 research units.
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## Objectives

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1. What workforce planning processes are in place at Interior, EPA, and the Forest Service?
  2. To what extent does workforce planning at Interior, EPA, and the Forest Service incorporate leading principles identified by GAO and the Office of Personnel Management (OPM)?
  3. How do Interior, EPA, and the Forest Service link workforce planning with their annual budget allocation processes?
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## Scope and Methodology

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- **Scope**
    - **Interior**—departmentwide and bureau-specific workforce planning efforts since fiscal year 2008.
    - **EPA**—agencywide workforce planning since 2006.
    - **Forest Service**—agencywide workforce planning since 2007.
    - Focused on highest organizational level; limited work at the regional and field levels.
  - **Methodology**
    - Reviewed agencywide workforce plans, budget documents, and guidance and, in limited cases, at other levels in the organizations.
    - Interviewed planning, human resources, budget and program officials responsible for these plans.
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## Scope and Methodology

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- Based on prior GAO work, OPM guidance, a literature search, and discussions with government officials and others knowledgeable about workforce planning, we identified six GAO and OPM principles for evaluating workforce planning:
    1. Align workforce planning with strategic plan and budget.
    2. Involve management, employees, and others.
    3. Analyze the workforce, determine critical skills and competencies, and identify gaps.
    4. Develop and implement strategies to address gaps in the workforce, including critical skills and competencies.
    5. Build capacity to support workforce strategies.
    6. Monitor and evaluate progress.
  
  - We conducted this performance audit from July 2009 to December 2009 in accordance with generally accepted government auditing standards. 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 obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
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## Objective 1



# Interior Workforce Planning

- No current departmentwide workforce plan.
- Delegated workforce planning to bureaus.
- Bureaus use departmental guidance provided by the Office of the Chief Human Capital Officer to develop their plans, and plans were generally presented in a consistent format.
  - A description of the bureau's mission and how the workforce plan is integrated with Interior's strategic plan.
  - A profile of the bureau's workforce and a discussion of the bureau's mission challenges and workforce needs.
  - A discussion of plans and solutions to meet workforce and skill needs and resources required to meet these needs.

## Objective 1



# EPA Workforce Planning

- Issued an agencywide workforce plan in 2006 developed by the Office of Human Resources.
  - Plan projected changes in core functions for 2005-2008.
  - EPA is working on updating the plan.
  - EPA issued a contract to explore better ways to assess staff levels for shifts in the workload.
  - Plan provides guidance to regional and program offices, which are responsible for developing their plans.
- Regional and program offices' workforce planning was beyond the scope of our work.

## Objective 1



# Forest Service Workforce Planning

- Current agencywide workforce planning process began in 2007.
  - Workforce Planning and Program Analysis Branch leads process.
  - 5-year agencywide workforce plan updated annually using standard templates completed by 24 units.
  - Annual workforce analysis provides information on composition of agency's workforce nationwide.
- Field units—such as regions and national forests—are primarily responsible for workforce planning, but they are outside the scope of our work.



## Objective 2

### Principle 1: Align Workforce Planning with Strategic Plan and Budget Formulation

Interior	EPA	Forest Service
<p>Three of 8 bureaus link workforce plans to one or more of Interior strategic goals, and none link plans to specific outcome measures. Bureaus generally request funds to implement their workforce plans when they formulate their budgets.</p>	<p>EPA could not demonstrate that the workforce plan is clearly aligned with the strategic plan or the budget. Workforce plan does not show how FTEs, skills, and locations will be aligned with the strategic plan or budget.</p>	<p>Workforce plan and FY 2007-2012 Forest Service strategic plan not clearly aligned. Workforce planning branch staff to participate in development of agency's next strategic plan.</p> <p>Agency began to link workforce planning with budget formulation during FY 2011 budget process.</p>





## Objective 2

### Principle 2: Involve Management, Employees, and Others in the Workforce Plan

Interior	EPA	Forest Service
<p>Most bureaus involved top management when developing workforce plans, but it is less clear whether they consistently involved employees and other stakeholders.</p>	<p>Top managers involved in developing workforce plans, and some employees participated to some extent.</p>	<p>Generally, executive leadership not involved in setting overall direction for agencywide workforce plan and has limited knowledge of plan. Workforce Planning and Program Analysis Branch leads process to develop the plan.</p> <p>Employees involved through small teams that complete the units' templates used to develop the plan.</p>



## Objective 2

### Principle 3: Analyze the Workforce, Determine Critical Skills and Competencies, and Identify Gaps

Interior	EPA	Forest Service
<p>Most bureaus identified mission-critical occupations (MCOs), gaps, challenges, and needed competencies or skill levels, and some identified occupations to streamline or eliminate.</p>	<p>Agency is identifying competency gaps in MCOs.</p> <ul style="list-style-type: none"> <li>• Identified 19 MCOs among 200 occupations.</li> <li>• Identified competency gaps for 12 priority MCOs.</li> </ul> <p>EPA has not comprehensively analyzed its workload and workforce in more than 20 years to determine the optimal number and distribution of staff agencywide.</p>	<p>Detailed annual workforce analysis conducted since 2007; some steps taken to identify competencies and occupation gaps.</p> <ul style="list-style-type: none"> <li>• Identified 74 MCOs that much of agency's workforce planning is based on, but executive leadership has not reviewed these.</li> <li>• Established technical competencies for three MCOs, as well as general leadership competencies. Developing process to identify gaps for these.</li> <li>• 2009-2013 workforce plan identified shortages in some MCOs (e.g., contracting and archaeology).</li> </ul>

## Objective 2



### Principle 4: Develop and Implement Strategies to Address Gaps in the Workforce, Including Critical Skills and Competencies

Interior	EPA	Forest Service
<p>All bureaus identified strategies managers may use to fill gaps, but not all track whether these strategies are used.</p>	<p>EPA officials stated that agency closed competency gaps on 6 occupations using recruitment, restructuring, succession planning, training, and mentoring.</p> <p>Gap closure efforts did not include workload analyses as a step toward examining the optimal distribution of the workforce to meet its strategic goals.</p>	<p>Developing national strategies to address workforce gaps, such as</p> <ul style="list-style-type: none"> <li>• 5-year recruitment strategy and annual implementation plan,</li> <li>• 5-year training and development plan,</li> <li>• process to identify and deliver competency-based training to address individual employee gaps, and</li> <li>• diversity strategy.</li> </ul>



## Objective 2

### Principle 5: Build Capacity to Support Workforce Strategies

Interior	EPA	Forest Service
<p>Bureaus vary in their efforts to inform managers on how to use human capital flexibilities, streamline administrative processes, and develop clear guidance.</p>	<p>Agency uses human capital flexibilities such as rotation opportunities for employees and a student loan repayment program.</p>	<p>Agency collecting data that may be used to provide guidance on using recruitment, retention, and relocation incentives, which the most recent workforce plan and analysis state have been underutilized.</p> <p>Managers not formally held accountable for use of human capital flexibilities.</p>



## Objective 2

### Principle 6: Monitor and Evaluate Progress

Interior	EPA	Forest Service
<p>Few bureaus described how they plan to measure the outcomes of workforce strategies or whether the strategies helped to achieve their strategic goals.</p>	<p>EPA has evaluated most of the regions and several other offices since fiscal year 2007, but has not comprehensively reviewed how or whether its workforce planning contributes to the achievement of strategic planning goals.</p>	<p>Forest Service recognizes the need to evaluate workforce planning but has not established an evaluation process.</p> <p>Limited steps taken to implement workforce plan's recommendations.</p>

## Objective 3



# Interior Workforce Planning and Budget Allocation

- Bureau workforce plans generally do not state that they will be used to inform budget allocation decisions.
- Bureaus generally do not track how program officials use workforce plans to allocate funds.
- Officials in some bureaus use workforce plans to distribute staff geographically, share needed skills, or adjust workloads to match available funding.

## Objective 3



# EPA Workforce Planning and Budget Allocation

- Workforce planning not clearly connected to budget allocation.
- Budget decisions are based on marginal changes to prior year budgets and occur in response to (1) direction from OMB and Congress and (2) spending caps imposed by EPA management.

## Objective 3



# Forest Service Workforce Planning and Budget Allocation

- Budget allocation guidance documents do not clearly link to workforce planning.
- According to executive leaders, workforce planning has been indirectly linked to annual budget allocation process through budget formulation at field and program levels.
- Forest Service began to more systematically link agencywide workforce plan with budget formulation during FY 2011 budget process.
- Incremental changes in budget allocations occur from year-to-year, but major changes must be planned years in advance.



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# Appendix II: Scope and Methodology

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This appendix details the methods we used to examine workforce planning at the Department of the Interior (Interior), the Environmental Protection Agency (EPA), and the Forest Service, an agency within the Department of Agriculture. We were asked to describe (1) the workforce planning processes in place at these agencies, (2) the extent to which workforce planning at these agencies incorporates leading principles we and the Office of Personnel Management (OPM) identified, and (3) how, if at all, these agencies link workforce planning with their annual budget allocation processes. Our review focused on workforce planning at the highest levels within these agencies, and the time periods reviewed at each agency varied as noted below.

Based on prior GAO work, OPM guidance, a literature search, and discussions with government officials and others knowledgeable about workforce planning, we identified six leading principles for evaluating workforce planning:

- align workforce planning with strategic planning and budget formulation;
- involve managers, employees, and other stakeholders;
- identify critical occupations, skills, and competencies and analyze workforce gaps;
- employ workforce strategies to fill the gaps;
- build the capabilities needed to support workforce strategies through steps to ensure the effective use of human capital flexibilities;<sup>1</sup> and
- monitor and evaluate progress toward achieving workforce planning and strategic goals.

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## Interior

To identify the workforce planning processes in place at Interior, we reviewed the workforce plans developed by each of Interior's eight bureaus, which are primarily responsible for workforce planning at the

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<sup>1</sup>Human capital flexibilities represent the policies and practices that an agency has the authority to implement in managing its workforce—for example, work-life programs, monetary incentives and awards, and special hiring authorities. See GAO, *Human Capital: Effective Use of Flexibilities Can Assist Agencies in Managing Their Workforces*, [GAO-03-2](#) (Washington, D.C.: Dec. 6, 2002).

department. The bureaus' plans had been developed since 2007, when the department's current policies, practices, and guidance became effective. These plans covered fiscal year 2008 through December 2009. Specifically, we reviewed the following workforce plans:

- *Bureau of Land Management Human Capital Workforce Plan, FY 2008–2013;*
- *Reclamation, Managing Water in the West, Workforce and Succession Plan, FY 2008–2012;*
- *Indian Affairs Workforce Plan, 2008–2013;*
- *Minerals Management Service Human Capital Workforce Plan, 2008–2013;*
- *National Park Service Workforce Management Plan, Developing, Valuing and Sustaining a World Class Workforce, FY 2008–2013;*
- *Office of Surface Mining Reclamation and Enforcement Workforce Plan, FY 2008–FY 2013;*
- *U.S. Fish and Wildlife Service FY 2008–2013 Workforce Plan;* and
- *USGS Workforce Plan, FY 2008–2013.*

We also reviewed the departmental guidance provided to the bureaus by the Office of the Deputy Chief Human Capital Officer to help them prepare these workforce plans, and interviewed human resources and budget officials at Interior and its eight bureaus.

We then compared the workforce plans and related documents for each of the bureaus to the leading principles for workforce planning to determine how, if at all, the principles had been adopted. In addition to the workforce plans, we reviewed Interior's current strategic plan, *GPR Strategic Plan, Fiscal Year 2007–2012, U.S. Department of the Interior* to determine links between the workforce plans and the department's strategic goals, and reviewed its fiscal year 2010 budget justifications to identify requests for funds to implement workforce strategies. We supplemented our comparison of documents with interviews with human resources and budget officials who were responsible for carrying out the bureaus' workforce planning and budget formulation efforts.

To determine how, if at all, Interior links workforce planning with its annual budget allocation process, we reviewed the bureaus' workforce plans and fiscal year 2010 budget justifications and interviewed bureau officials responsible for workforce planning and budgeting.

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## EPA

To determine the existing workforce processes at EPA, we reviewed relevant agency documents, such as its 2006 strategic workforce plan, reports to OPM, and EPA's budget documents. In addition, we reviewed GAO reports and EPA Office of the Inspector General reports on workforce planning issued since 2000. We examined workpapers of the EPA Office of the Inspector General while its review of workforce planning was ongoing. We interviewed agency officials, particularly those responsible for human resources and budget issues.

To determine the extent to which EPA incorporates leading principles, we focused on the six leading principles developed by GAO and OPM for effective strategic workforce planning. We examined documents such as EPA's 2006 strategic workforce plan; the agency's annual human capital reports to OPM; EPA's 2010 budget, 2009 and 2010 performance plans, and the 2006 through 2011 strategic plan; and the 2009 through 2014 Strategic Plan Change Document for Public Review. Also we interviewed agency officials responsible for workforce planning and the budget issues. As part of our examination of EPA's identification of workforce gaps, we reviewed its 2008 Superfund workload study. We interviewed Superfund program officials and officials from two regions, recommended by EPA, about their views on workforce planning for their specific areas in light of the 2008 workload study. We provided written questions to the agency's human resource and budget offices requesting written responses on how they follow each of the leading principles and reviewed their responses. As part of our examination of employee participation in workforce planning, we interviewed officers of the American Federation of Government Employees, which represents the majority of agency employees.

To determine how, if at all, EPA links workforce planning with its annual budget allocation processes, we reviewed relevant workforce planning documents, budgets, and the agency's strategic plan. In addition, we interviewed agency officials responsible for workforce planning and the budget.

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## Forest Service

To address our first and second objectives for the Forest Service, we reviewed the agency's annual workforce analyses and 5-year workforce plans developed since the formation of its Workforce Planning and Program Analysis Branch in 2007. Specifically, we reviewed the agencywide workforce plans for 2008 through 2012 and 2009 through 2013; 2007 and 2008 workforce analyses, as well as the draft 2009 analysis; and the agency's workforce planning guide. To gather additional information, we went to the Forest Service's Albuquerque Service Center, where we conducted interviews with officials from the agency's Workforce Planning and Program Analysis Branch responsible for the agencywide analyses and plans, Forest Service human resources officials, and other agency officials. In addition, we interviewed a human resources official at the Department of Agriculture. To enhance our understanding of the role of the field and other units in agencywide workforce planning, we reviewed several examples of the unit-level workforce templates used to develop the agencywide plan and interviewed officials from two such units—the Chief Financial Officer and a regional office.

To further address our second objective for the Forest Service, we reviewed the agency's strategic plan for fiscal years 2007 through 2012; budget-related documents; drafts of the 5-year recruitment strategy and annual recruitment plan; drafts of the training and development strategy and 5-year plan; and other information obtained from officials responsible for training and development, recruiting, civil rights and diversity, and employment policy, including human capital flexibilities. In addition, we interviewed strategic planning and budget officials; six of the eight members of the agency's Executive Leadership Team, including the Associate Chief, Chief Financial Officer, and the agency's four deputy chiefs; and an official responsible for developing the agency's employee development and training efforts. To evaluate the Forest Service's agencywide workforce planning, we then analyzed the information gathered and compared it to the leading principles for workforce planning we and OPM previously identified.

To address our third objective for the Forest Service, we reviewed the agency's guidance documents on allocating the fiscal year 2009 budget for the following areas: National Forest System, Business Operations, Forest and Rangeland Research, State and Private Forestry, and Wildland Fire Management. We also reviewed the fiscal year 2010 budget request and the fiscal year 2011 business plans developed during the Budget Performance Integration process for each of the agency's strategic goals. In addition, we conducted interviews with the Forest Service's workforce planning,

strategic planning, and budget officials; the agency's Associate Chief; and the four deputy chiefs responsible for budget allocation.

We conducted this performance audit from July 2009 through March 2010 in accordance with generally accepted government auditing standards. 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 obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix III: Full-Time Equivalent Employees at Interior, EPA, and the Forest Service from Fiscal Years 1999 through 2010

**Table 1: Number of Full-Time Equivalent Employees at Interior and Its Eight Bureaus, Fiscal Years 1999 through 2010, as Reported in Interior's Budgets in Brief for Fiscal Years 2001 through 2011**

Organizational unit	Fiscal year											
	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
National Park Service	19,918	19,808	20,289	20,505	20,574	20,399	20,485	20,056	19,832	20,301	20,991	21,922
Bureau of Land Management	9,841	9,938	10,373	10,916	11,219	11,136 <sup>a</sup>	10,958	10,668	10,577 <sup>b</sup>	10,626	10,834	11,107
U.S. Fish and Wildlife Service	8,117	8,360	8,530	8,908	9,248	9,345	9,170	8,910	8,749	8,704	8,925	9,400
Indian Affairs	9,343	9,241	9,407	9,667	9,617	9,712	9,664	9,233	8,731	8,404	8,265	8,451
U.S. Geological Survey	9,482	9,417	9,527	9,611	9,448	9,002	8,920	8,578	8,368	8,355	8,482	8,596
Bureau of Reclamation	5,786	5,632	5,609	5,634	5,721	5,750	5,731	5,630	5,510	5,344	5,352	5,224
Departmental Offices and Departmentwide Programs	2,079	2,457	2,561	2,693	2,829	3,035 <sup>a</sup>	3,294 <sup>c</sup>	3,451	3,524 <sup>b</sup>	3,514	3,569	3,680
Minerals Management Service	1,745	1,771	1,743	1,732	1,701	1,717	1,651 <sup>c</sup>	1,641	1,600	1,600	1,643	1,708
Office of Surface Mining Reclamation and Enforcement	645	636	627	617	595	567	542	528	528	525	516	515
<b>Total, Interior</b>	<b>66,956</b>	<b>67,260</b>	<b>68,666</b>	<b>70,283</b>	<b>70,952</b>	<b>70,664</b>	<b>70,415</b>	<b>68,694</b>	<b>67,419</b>	<b>67,373</b>	<b>68,577</b>	<b>70,603</b>

Source: Interior's Budgets in Brief for fiscal years 2001 through 2011.

Notes: Totals for fiscal years 1999 through 2009 are actuals, and totals for fiscal year 2010 are estimates. Some columns do not sum due to rounding.

Departmental Offices and Departmentwide Programs includes full-time equivalent employees at Office of the Secretary, Central Utah Project, Office of Insular Affairs, Office of the Solicitor, Office of Inspector General, Office of Special Trustee for American Indians, Wildland Fire Management, Payments in Lieu of Taxes, Central Hazardous Materials Fund, Natural Resource Damage Assessment, Working Capital Fund/Franchise Fund, National Business Center, and National Indian Gaming Commission.

<sup>a</sup>The 2006 budget proposed to transfer management of the Central Hazardous Materials Fund from the Bureau of Land Management to Departmental Offices. Interior adjusted its staffing data from fiscal year 2004 on to reflect this change.

<sup>b</sup>The 2009 budget moved the Wildland Fire Management appropriation from the Bureau of Land Management to Departmentwide Programs. Interior adjusted its staffing data from fiscal year 2007 on to reflect this change.

<sup>c</sup>The Interior Franchise Fund was transferred in 2006 to the National Business Center. Interior adjusted its staffing data from fiscal year 2005 on to reflect this change.

**Appendix III: Full-Time Equivalent  
Employees at Interior, EPA, and the Forest  
Service from Fiscal Years 1999 through 2010**

**Table 2: Number of Full-Time Equivalent Employees at EPA, Fiscal Years 1999 through 2010, as Reported in EPA’s Annual Congressional Justification Reports Fiscal Years 2001 through 2010**

Fiscal year											
1999 <sup>a</sup>	2000	2001	2002	2003	2004 <sup>b</sup>	2005 <sup>b</sup>	2006	2007	2008	2009 <sup>a</sup>	2010 <sup>c</sup>
18,366.2	17,670.0	17,558.1	17,590.4	17,621.4	17,610.9	17,494.6	17,354.6	17,071.9	16,916.4	17,252.1	17,384.3

Source: EPA Annual Congressional Justification Reports for fiscal years 2001 through 2010.

<sup>a</sup>Enacted budget data were the only data available for this year.

<sup>b</sup>Obligation budget data were the only data available for this year.

<sup>c</sup>Budget data were the only data available for this year.

**Table 3: Number of Full-Time Equivalent Employees at the Forest Service, Fiscal Years 1999 through 2010, as Reported in the Forest Service’s Budget Justification Reports for Fiscal Years 2001 through 2010**

Fiscal year											
1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010 <sup>a</sup>
34,366	34,079	35,390	36,704	35,547	37,648	36,631	34,907	33,912	33,623	33,705	33,601

Source: Forest Service Budget Justifications for fiscal years 2001 through 2010.

Note: Full-time equivalent (FTE) employees for fiscal years 1999 through 2009 are actual FTEs.

<sup>a</sup>Number of FTEs included in the 2010 President’s Budget Request.

# Appendix IV: Mission-Critical Occupations Identified by Interior, EPA, and the Forest Service

**Table 4: Mission-Critical Occupations Identified in the Workforce Plans of Interior’s Bureaus, Fiscal Year 2008**

Bureau	Mission-critical occupations
Bureau of Land Management	20 mission-critical occupations: civil engineer, contracting specialist, forester, general biologist, geologist, human resource specialist, human resource assistant, hydrologist, information technology specialist, land law examiner, law enforcement criminal investigator, law enforcement ranger, leadership positions, mining engineer, park ranger, petroleum engineer, petroleum engineering tech, purchasing agent, realty specialist, and wildlife biologist
Bureau of Reclamation	5 mission-critical occupations: biology, electrician, engineering, information technology management, and plant mechanic <sup>a</sup>
Indian Affairs	26 mission-critical occupations: archeology, civil engineering, contract specialist, correctional officer, criminal investigating, education and training technician, education and vocational training, engineering technician, environmental protection specialist, forestry, general biological science, geology, human resources management specialist, hydrology, information technology management, legal instruments examining, management and program analysis, miscellaneous administration and program, police, program management, rangeland management, range technician, realty, safety and occupational health management, social work, and wildlife biology <sup>b</sup>
Mineral Management Service	7 mission-critical occupations: accountants/auditors, contracting specialists, geologists, human resources specialists, information technology specialists, Minerals Revenue Management business specialists, and petroleum engineers
National Park Service	4 mission-critical occupations: contract specialists, human resources management, information technology, and park rangers/law enforcement and interpretation
Office of Surface Mining Reclamation and Enforcement	13 mission-critical occupations: accountant, auditor, biological scientist, civil engineer, contract specialist, financial specialist, geologist, human resources specialist, hydrologist, information technology specialist, mining engineer, physical scientist, and reclamation specialist
U.S. Fish and Wildlife Service	11 mission-critical occupations: civil engineer, contracting specialist, education specialist, general biologist, geologist, human resources specialist, hydrologist, information technology, park ranger, realty specialist, and wildlife biologist
U.S. Geological Survey	12 mission-critical occupations: budget analysts, civil engineers, contract specialists, financial specialists, general biologist, geographers, geologists, human resources specialists, hydrologists, information technology specialists, leadership, and wildlife biologists

Source: Interior’s bureaus’ workforce plans.

<sup>a</sup>The Bureau of Reclamation also identified six high-priority occupations to include in its workforce plan: education specialist, geologist, hydrologist, park ranger, realty specialist, and wildlife biologist.

<sup>b</sup>Indian Affairs also identified 16 important occupations to include in its workforce plan: accounting technician, engineering equipment operating, facility management, general business and industry, general education and training, irrigation system operation, laboring, legal assistance, maintenance mechanic, miscellaneous clerk and assistant, motor vehicle operating, office automation clerical and assistance, secretary, security guard, social services, and training instruction.



**Appendix IV: Mission-Critical Occupations  
Identified by Interior, EPA, and the Forest  
Service**

**Table 5: Mission-Critical Occupations Identified by the Environmental Protection Agency, as of December 2009**

<b>Mission-critical occupations</b>
19 mission-critical occupations: accountants/auditors, attorneys, biologists, chemists, contract specialists, ecologists, economists, environmental engineers/mechanical engineers, environmental protection specialist, financial specialists, geneticists, grants specialists, health scientists, human resources specialists, information technology, leaders, physical scientists, public affairs/information specialists, and toxicologists

Source: EPA.

**Table 6: Mission-Critical Occupations Identified by the Forest Service, as of January 2010**

<b>Type of occupational series</b>	<b>Mission-critical occupations</b>
Professional	30 mission-critical occupations: accountant, archeology, biological science student trainee, botany, chemistry, civil engineer, contracting, ecology, economist, education and vocational training, education services, engineering and architecture student trainee, entomology, fisheries biologist, forestry, general biology, general engineer, geology, hydrology, landscape architecture, land surveying, meteorology, nurse, plant pathology, physical science, range management, social science, soil science, statistician, and wildlife biologist
Administrative	22 mission-critical occupations: administrative officer, budget analyst, civil rights, criminal investigating, financial administration and program, miscellaneous administration and program, general arts and information, general business, general inspection investigation and compliance, human resources management, information technology specialist, line manager, manpower development, program analyst, public affairs, realty, recreation specialist, safety and occupational health management, support services, telecommunications, transportation operations, and transportation specialist
Technical	22 mission-critical occupations: accounting technician, aircraft operations, biological science technician, cartographic technician, compliance inspection and support, electronics, engineering technician, forestry technician, forestry technician (fire), general arts and information, general business, general clerk, hydrological technician, office automation, human resources assistant, physical science technician, procurement, purchasing, range technician, recreation aid and assistant, social service, and supply clerk

Source: Forest Service, Workforce Planning and Program Analysis Branch.

# Appendix V: Comments from the Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAR 22 2010

OFFICE OF  
ADMINISTRATION  
AND RESOURCES  
MANAGEMENT

Ms. Anu Mittal  
Mr. John B. Stephenson  
Directors, Natural Resources and Environment  
U.S. Government Accountability Office  
Room 2T23  
441 G Street, N.W.  
Washington, D.C. 20548

Dear Ms. Mittal and Mr. Stephenson:

Thank you for the opportunity to review the U.S. Government Accountability Office's (GAO's) draft report entitled "Interior, EPA, and the Forest Service Should Strengthen Linkages to Their Strategic Plans and Improve Evaluation" (GAO-10-413). We have enclosed comments for your consideration.

We recognize that EPA must continue to address the human capital needs of its workforce to remain positioned for success as we pursue our vital mission of protecting human health and the environment. The Agency agrees with the principles underlying GAO's recommendations; however, we request that GAO consider refining the specifics of the recommendations. We have proposed suggested modifications to the recommendations and also provided clarification on the complexities of implementing an effective workforce planning process.

We appreciate the opportunity to comment on this draft report.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig E. Hooks".

Craig E. Hooks  
Assistant Administrator

Enclosure

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EPA's Comments  
on  
GAO's Draft Report  
"Interior, EPA, and the Forest Service Should Strengthen Linkages to  
Their Strategic Plans and Improve Evaluation"  
(GAO-10-413)

**General Comment:**

EPA uses a number of effective workforce planning tools not reflected in this report. The draft report also does not illustrate fully the tools EPA, already utilizes to manage its workforce effectively. We would welcome an opportunity to work further with GAO to incorporate a more accurate depiction with specific examples of EPA's efforts in these areas.

**Recommendation Comments:**

**Page 31, Recommendation: "Incorporate into their workforce plans clear and explicit links between the agency's workforce plans(s) and its strategic plan, and describe how the workforce plan will help them achieve their strategic goals."**

We recommend deleting "explicit" from the recommendation. EPA's organizational structure is appropriately decentralized to meet the needs of different regions and different Agency goals. Our workforce is also varied, i.e., EPA does not have large groups of employees performing identical work, such as the Transportation Security Agency, for example. As a result, much of EPA's workforce planning must be done at the "local" level to be effective. This workforce planning *is* driven by strategic objectives; however, they are *detailed* objectives appropriate for the lower levels of the organization. Through the Agency's budget and organizational and employee performance planning processes, these detailed objectives cascade from those in the Agency's strategic plan. These processes are the best mechanisms to document the flow from higher level objectives to more detailed organizational objectives, and workforce planning is most appropriately managed and documented at the detailed level. While the Agency's workforce planning is driven by Strategic Goals, requiring additional documentation would impose a burden with no benefit.

**Page 31, Recommendation: "Establish mechanisms that the agencies can use to monitor and evaluate the effectiveness of their workforce planning efforts, particularly in achieving the agency's strategic goals."**

EPA would welcome specific examples of such mechanisms utilized by other Federal Government organizations that we could add to our current evaluation mechanisms.

**Other Comments:**

**Page 14, regarding the statement: "Furthermore, we found the strategic plan and the 2009 through 2014 Strategic Plan Change Document for Public Review do not refer to the workforce plan and the budget only briefly refers to the workforce plan in the fiscal year 2010 Congressional Justification. The 2006 through 2011 strategic plan occasionally**

**referred to workforce needs for some strategic goals, but it did not include any expected measurable workforce outcomes.”**

In the 2006-2011 strategic plan, the Agency included a human capital section in each of the five strategic goal chapters that identifies future staff skill needs and, in some cases, recruiting strategies to fill those gaps.

**Page 27, regarding the statement: “EPA has not comprehensively monitored and evaluated the results of its workforce planning efforts, including whether its workforce planning contributes to the agency’s strategic goals.”**

EPA evaluates Agency workforce planning efforts as a formal part of its Human Capital Audit and Assessment Program. This Program, approved by OPM, includes assessments of each of the five areas of the Human Capital Assessment and Accountability Framework (HCAAF), including workforce planning.

**Page 29, regarding the statements: “At EPA, the agency does not directly link workforce planning with its annual budget allocation process....spending caps imposed by EPA management”.**

EPA does consider needs based on Agency workforce planning in its annual budget process. For example, in the FY 2010 Budget, based on the priorities outlined by the Administrator, the Agency added FTE and associated payroll to support significant enhancements to EPA's High Production Volume Chemicals Program. In the FY 2011 Budget, recognizing the need to strengthen climate change efforts, the Agency added FTE and associated payroll to support work on greenhouse gas emission standards. Also, in the FY 2011 Budget, the Agency reduced FTE and associated payroll in the RCRA waste management program as the Agency plans to scale back headquarters resources for voluntary programs including WasteWise, Green Highways, and Pay-As-You-Throw.

**Page 30-31, regarding the statement: “Until Interior, EPA, and the Forest Service more clearly align their workforce plans with their strategic plans and monitor and evaluate their progress, they are at risk of not have the appropriately skilled workforce they need to effectively achieve their mission.”**

EPA continues to adapt to the changing face of environmental and human health protection as the economy and society evolve. Key to the continuation of our innovation and adaptability is an approach that provides our managers with the flexibility to plan and implement workforce strategies that support their responsibilities and accountability under the Agency’s Strategic Plan. In January 2008, OMB and OPM determined that EPA met the government-wide HCAAF standards when EPA achieved a “Green” status score for the Strategic Management of Human Capital under the President’s Management Agenda. This is certainly an indicator of success. EPA believes its continued commitment to strengthening its workforce and leveraging human capital accomplishments will allow the Agency to accomplish its mission.

# Appendix VI: Comments from the Forest Service



Forest Service  
Washington Office

1400 Independence Avenue, SW  
Washington, DC 20250

File Code: 1380-11380-1

Date: MAR 22 2010

Anu K. Mittal  
Director, Natural Resources and Environment  
Government Accountability Office  
441 G Street NW  
Washington, DC 20548

Dear Ms. Mittal:

Thank you for the opportunity to review and comment on the Government Accountability Office (GAO) draft report, GAO-10-413, "Workforce Planning, Interior, EPA and the Forest Service Should Strengthen Linkages to Their Strategic Plans and Improve Evaluation." The Forest Service has reviewed the report and generally agrees with the findings and conclusions. The draft report includes two recommendations for further action:

- Incorporate into their workforce plans clear and explicit links between the agency's workforce plan(s) and its strategic plan, and describe how the workforce plan will help them achieve their strategic goals.
- Establish mechanisms that the agencies can use to monitor and evaluate the effectiveness of their workforce planning efforts, particularly in achieving the agency's strategic goals.

Furthermore, the audit conveys that while the agency has developed and issued annual workforce plans that contain important information about current and emerging workforce issues and has identified a variety of recommendations, the agency has not taken advantage of these efforts. The Forest Service is working on communicating the recommendations and assigning responsibility for the timely implementation of the recommendations. With these elements in place, the agency will be in a position to capitalize on these opportunities that address our workforce needs.

If you have any questions, please contact Donna M. Carmical, Chief Financial Officer, at 202-205-1321 or [dcarmical@fs.fed.us](mailto:dcarmical@fs.fed.us).

Sincerely,

*for* THOMAS L. TIDWELL  
Chief

cc: Sandy T Coleman, Robin Bailey, Ronald Banegas, Valerie Harwood



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# Appendix VII: GAO Contacts and Staff Acknowledgments

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## GAO Contacts

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John B. Stephenson, (202) 512-3841 or stephensonj@gao.gov

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## Staff Acknowledgments

In addition to the contacts named above, Andrea Wamstad Brown (Assistant Director), Edward Kratzer (Assistant Director), Cheryl Williams (Assistant Director), Krista Breen Anderson, Stephen Cleary, Laura Erion, Michael J. Hanson, Caryn Kuebler, Robin M. Nazzaro, Cheryl Peterson, Daniel Semick, Rebecca Shea, Carol Herrnstadt Shulman, Gregory Wilmoth, and Rebecca Yurman made key contributions to this report.

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