

Reclamation Manual

Directives and Standards

TEMPORARY RELEASE

(Expires 09/06/2025)

- Subject:** Human Capital Management Evaluation Program
- Purpose:** This Directive and Standard (D&S) establishes requirements of the Bureau of Reclamation's (Reclamation) independent audit program responsible for reviewing Human Resources Management (HRM) systems, activities, and programs to ensure efficiency and effectiveness, strategic alignment, and legal and regulatory compliance.
- Authority:** Chief Human Capital Officers Act of 2002 (CHCO), enacted as part of the Homeland Security Act of 2002 (P.L. No. 107-296; title XIII, Nov. 25, 2002, 116 Stat. 2287; 5 USC 1401); Government Performance and Results Modernization Act of 2010 (GPRA)(P.L. No. 111-352, Jan. 4, 2011; 124 Stat. 3866; 31 USC 1101); Evidence-Based Policy Making Act of 2018 (Evidence Act)(P.L. No. 115-435, Jan. 14, 2019; 132 Stat. 5529; 44 USC 3561); 5 USC 305, *et seq.*; 5 USC 1103(c); 5 CFR Part 10.2; 5 CFR Part 250 Subpart B; Office of Management and Budget (OMB), [Circular No. A-11](#), July 2024; [DOI Personnel Bulletin \(PB\) No. 19-10](#), *Policy on Human Capital Accountability and Program Evaluation*, September 16, 2019; Office of Personnel Management (OPM), [Human Capital Reviews](#), May 2018.
- Approving Official:** Deputy Commissioner - Policy, Administration and Budget (PAB)
- Contact:** Human Resources Division, Human Resources Policy Office (84-12100)

1. **Introduction.** An effective workforce is vital to achieving Reclamation's mission and success. Reclamation is committed to managing its workforce through effective HRM practices and a rigorous Human Capital Management Evaluation (HCME) system.
 - A. **HCME Program.** The HCME Program is executed within the scope of the Department of the Interior's (DOI) accountability framework, which is a comprehensive strategic and performance planning process that supports the foundation of DOI's accountability efforts by ensuring that Reclamation's HC activities are properly planned, integrated, and executed.
 - B. **HCME Process.** The HCME Process demonstrates results, promotes continuous process improvement, leverages data analytics, and ensures adherence to merit system principles and other Federal laws and regulations through evaluation measures. The HCME Process is commonly conducted through scheduled HCME Reviews but can also be executed to address targeted HRM activities outside predetermined HCME Review periods. The HCME Process may otherwise be referred to as the Evaluation Process.

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- C. **HCME Review.** A HCME Review is a scheduled evaluation of HRM activities of a regional Servicing Human Resources Office (SHRO) within a predetermined timeframe and through the methodology and requirements outlined herein. A HCME Review may otherwise be referred to as a HC Review, HC Audit, or HC Accountability Review.
2. **Applicability.** This D&S applies to all HRM functions that Reclamation managers, supervisors, and Human Resource (HR) officials may perform in accordance with the DOI policies and procedures. When provisions of this policy differ from changes in applicable law or regulation, the changes in law or regulation govern.
3. **Roles and Responsibilities.**
- A. **Reclamation Human Capital Officer (HCO).** The HCO is responsible for:
- (1) programmatic oversight and maintenance of the Reclamation HCME Program as set forth by DOI and higher-level policy; and
 - (2) appointing a HC Accountability Program Manager to implement and monitor the requirements of the HCME Program.
- B. **Human Resources Policy Office (HRPO).** The HRPO is responsible for:
- (1) ensuring the HCME Program is embedded into the HC strategic goals and planning efforts across all HC programmatic functions;
 - (2) participating in regional HCME reviews as subject matter experts and auditors, as needed; and
 - (3) providing the APM awareness of HC activities with a recognized need for review of compliance or consistency.
- C. **Accountability Program Manager (APM).** The APM will coordinate and monitor the evaluation process, to include:
- (1) formulating the HCME Review Evaluation Team, requesting audit team members from outside the SHRO under evaluation when necessary;
 - (2) coordinating support from SHRO leadership to assemble a qualified, technically proficient Evaluation Team from outside the SHRO under evaluation, to include DE team members who possess current DE certification, if necessary;

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- (a) **Delegated Examining (DE) Accountability.** 5 U.S. Code § 1104 provides that OPM may delegate to agencies authority for competitive examination. Reclamation has been delegated with this authority through DOI. Only persons who have received and maintain DE certification may conduct the audits. The internal accountability system is designed to assure that the use of DE authority complies with law and merit systems principles.
- (3) communicating roles, responsibilities, and expectations to the Evaluation Team;
 - (4) conducting pre-evaluation planning and coordination meetings with the Evaluation Team prior to conducting a scheduled HCME Review;
 - (5) developing the evaluation methodology;
 - (6) determining the types and quantity of records to review;
 - (7) monitoring and conducting analysis of HC metrics data;
 - (8) collecting and conducting analysis of advance information;
 - (9) conducting briefings with the Regional Director (or their designee) and/or Deputy Commissioner, Human Resources Officer (HRO) and HR Staff, as appropriate;
 - (a) Note: Regional staff may attend at management's invitation. The APM will defer all decisions on who attends the opening and closing briefings to the top management official since these meetings are convened for management's benefit and information.
 - (10) providing effective input to improve HRM processes and deficiencies identified during the evaluation;
 - (11) developing and providing Reclamation compliance audit reports to Reclamation senior management and the DOI HC APM;
 - (12) writing final audit reports, providing timely and effective analysis of findings;
 - (13) submitting final reports to DOI HC APM; Reclamation HCO, Regional Offices; and OPM, as necessary;
 - (14) reviewing and approving the Region's Corrective Action Plan (CAP);
 - (15) preparing final evaluation close-out memorandum when all corrective (required) actions have been satisfactorily addressed;

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- (16) collaborating with HRO to respond appropriately to DOI requests regarding HCME findings report and regional CAP;
- (17) monitoring and following-up on all responses to all adverse findings, and ensure corrective actions are implemented;
- (18) monitoring and following-up on all HC metrics to identify improvement needs;
- (19) maintaining data systems used to monitor HC program results; and
- (20) establishing and maintaining internal follow-up controls between accountability reviews to monitor the Region's efforts to correct findings between the required three-year accountability reviews.

D. HCME Review Evaluation Team. Evaluation Team members are HR Specialists with technical knowledge, analytical capabilities, certification, as applicable, strong communication, and persuasion skills. Evaluation Team members are responsible for:

- (1) reviewing HRM case file records within a predetermined review period;
- (2) participating in HCME Review activities (e.g., conducting employee interviews, daily in/out-brief, etc.);
- (3) notifying the APM of any illegal, irregular, improper, and inconsistent actions within the scope of the HCME Review; and
- (4) capturing results of the records review in the DOI Virtual Accountability Compliance and Evaluation (VACE) system.

E. Human Resource Officers (HRO). HROs are responsible for:

- (1) establishing a point of contact to act as liaison between the SHRO, APM, and Evaluation Team members;
- (2) providing appropriate resources to augment Evaluation Teams to assist in conducting a compliance review upon request of the APM;
 - (a) Team members may be identified for the fiscal year's upcoming accountability reviews to allow the APM to facilitate advance planning and coordination.

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- (3) furnishing advance information requests for documents for the applicable HCME Review period, as well as any requested logistical or administrative support and operating information to the APM by the published due dates;
- (4) overseeing the selection, development, training, and management of a high-quality, highly performing workforce in accordance with the merit system principles;
- (5) preparing a CAP to address the required actions identified in the report;
- (6) ensuring timely responses to all findings and corrective actions are developed and implemented;
- (7) providing all information requested by the Evaluation Team before, during, and after (if necessary) the HCME Review; and
- (8) furnishing completed pre-inspection checklists.

F. Regional Leadership.

- (1) participating in in/out-brief meetings and interviews with the APM, HCO and Evaluation Team as scheduled; and
- (2) committing to support the regional SHRO in their execution of sound HRM practices, including the resulting required action of a regional HCME Review and considering subsequent Evaluation Team recommendations.

4. Evaluation Methodology.

A. Steps in methodology development:

- (1) identifying and reviewing preliminary data sources;
- (2) identifying the best possible techniques for data collection;
- (3) Advanced Information Requests;
- (4) selecting a population or sample population; and
- (5) determining the sequence for data collection.

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- B. Evaluation assessment measures (further defined in Appendix B):
- (1) Met;
 - (2) Partially Met; or
 - (3) Not Met.
5. **HCME Review Period.** The review period is 18 months preceding the scheduled evaluation date, unless otherwise determined by the APM.
6. **Planning Phases for HCME Reviews.** See Appendix A for associated timelines for HCME Review activities.
- A. **PHASE I: Pre-Evaluation Phase.** There are key pre-evaluation activities that need to occur prior to conducting a HCME Review. These include developing an evaluation methodology, gathering advance information, and making logistical arrangements (if applicable). Most of the time devoted to conducting an evaluation should be spent in the pre-evaluation phase.
- (1) **Selecting Records to Review.** A well-constructed records HCME Review will focus on the key documents and elements required to meet the objectives of the evaluation. The review is an essential tool in assessing an organization's compliance with legal and regulatory requirements in processing personnel actions and in executing delegated personnel authorities and adhering to merit system principles. The records review provides information that cannot be obtained through statistical reviews, interviews, or analysis of questionnaire responses.
 - (2) **Case File Sampling.** Records selected is a random sampling of activity from all HR staff. The APM will select cases based on judgement and types of activity after analysis of reports (e.g., USA Staffing, Federal Personnel and Payroll System (FPPS), etc.). The sample size will be representative of the types and levels of activity observed through data analysis and review of activity logs rather than a certain number or percentage and will be large enough to identify systematic trends but reasonable enough for the evaluation team to conduct a thorough analysis. Case file records will be collected from the regional SHRO in the form of Advance Information Requests. The case files may include, but are not limited to, the following records:
 - (a) Merit Promotion and Delegated Examining Announcements and Appointments;

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- (b) Pathways Programs, Direct Hire and other Special Hiring Authorities Announcements and Appointments;
 - (c) Position Descriptions and Fair Labor Standards Act Coding;
 - (d) Organizational Structure and Workforce/Succession Planning Efforts;
 - (e) Training and Employee/Leadership Development Programs and Participation;
 - (f) Monetary, Non-Monetary, and Honor Awards and Justifications;
 - (g) Performance Plans, Quality Step Increases; and
 - (h) Incentives and Justifications (e.g., Recruitment, Relocation, Retention, etc.).
- (3) **Other Considerations.** Various considerations will be included to conduct a holistic HCME Review, such as reporting data (e.g., DataMart, FPPS, USA Staffing, etc.) to identify anomalies, such as incorrect Nature of Action (NOAC) and/or Legal Authority Code (LAC); unique workforce structure, e.g., significant proportion of seasonal employees; and/or trends, such as the number of a specific type of personnel action or number and types of occupations. Additionally, review USA Staffing to identify trends, such as many non-selections, unused or cancelled certificates, and re-announcements. Many factors, including size of the sample, nature of the records to be reviewed, previous findings, and/or problems suspected due to preliminary data analysis, may influence the decision about how to involve the Region in pulling records for review. A list of case files selected for review will be provided to the Region with the Advanced Information Request. The Evaluation Team must take the following into consideration when determining the sampling size:
- (a) previous evaluation reports from the Region;
 - (b) evaluation results in previous DE and HCME Reviews – ensure actions addressed in previous years do not continue to occur and that reported corrections in policy and procedures were corrected;
 - (c) unusual or uncommonly used NOACs/LACs;
 - (d) status of mission critical occupations;
 - (e) different pay scales/plans;

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- (f) traditional concerns (e.g., veterans preference);
 - (g) proper/consistency in the application of compensation flexibilities;
 - (h) review of new delegations or new staff; and
 - (i) issues identified by the DOI or Reclamation.
- B. PHASE II: Evaluation Phase.** There are key evaluation phase activities that are the crux of conducting an evaluation. These include conducting the in-brief meeting with the Regional Director and/or Deputy Commissioner, and HRO, conducting records review, conducting interviews, team meetings, meeting with HR staff/daily briefings, and conducting the close-out briefing of preliminary findings.
- (1) In this phase, the evaluation team assesses the Human Capital Framework (HCF) system(s) to determine if it meets the standard and to ensure the system complies with merit system principles and laws and regulations. During this phase, the evaluation team will analyze, compare, and match the information found in the pre-evaluation and evaluation phases to the key indicators of expected outcomes of the HCF system's focus areas.
- C. PHASE III: Post-Evaluation Phase.** The post-evaluation activities occur after the evaluation phase is concluded. Activities in this phase include organizing material and drafting a final report and developing recommended and required action items.
- (1) **Evaluation Report.** In coordination with the Evaluation Team, the APM will complete the Evaluation Report (template provided in Appendix C). The Evaluation Report will be provided to regional leadership within 60 days of the HCME Review.
 - (2) **Corrective Action Plan (CAP).** The CAP must identify the specific activities taken to address each of the required actions and include expected completion dates, key milestones, or other information identifying efforts toward correction. The HRO is obligated to implement, correct, and/or complete the actions set forth in a CAP based on required actions in the Findings Report. Upon approval of the CAP, a synopsis of actions taken by the regional SHRO will be provided to DOI and/or OPM. Many recommendations made in the report support required actions and are based on Reclamation's obligation to improve Federal HRM practices and activities. While the recommendations may not solely be supported by a specific legal or regulatory authority, they are the advice on how to improve HRM processes, promote efficiency and gain consistency.

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7. **Compliance.** Compliance during a HCME Review directly impacts the performance and health of Reclamation HC programs. It is the responsibility of the HRPO, Regional Director and/or Deputy Commissioner, and the HRO to ensure that the organization is effectively and efficiently accomplishing our HC goals and objectives in alignment with the DOI's Strategic Plan; and, to ensure that policies, programs, practices, and operations adhere to the merit system principles and other Federal personnel laws and regulations. To ensure compliance with the CAP, the APM will implement internal follow-up controls to monitor efforts to correct findings between the required three-year accountability reviews, which may include:
- A. remedial actions, based upon the specific finding(s) and non-compliance;
 - B. providing technical assistance to focus on the Region's attention to implementing solutions; and/or,
 - C. conducting a problem-oriented follow up assessment when problems are substantial or when corrective actions are otherwise hard to achieve or measure.
8. **Definitions.**
- A. **Advance Information Request.** The advance information request identifies the specific material the Evaluation Team will need from the SHRO before the HCME Review and what the SHRO needs to provide during the evaluation to assist in the fact-finding process. This request is based on the evaluation agenda. The advance information request is generally an attachment to the copy of the scheduling letter sent to the SHRO.
 - B. **Audit.** An audit is a process used to determine whether something was done the way it was supposed to be done, such as checking personnel records to verify their correctness or personnel action processing to ascertain if the prescribed steps were followed. Audits deal with facts that are not open to dispute and address process violations through corrective action.
 - C. **Best Practice.** An activity or process that has improved performance and/or increased positive results, which are measurable. The practice can be adopted, with or without modification, to improve effectiveness and efficiency at other offices or components.
 - D. **Compliance.** This refers to the state of complying with or being in accordance with laws, rules, regulations, standards, or requirements. For example, in conducting a records review of personnel actions, an evaluator would determine if each action examined conformed with the appropriate requirements. At the program level,

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compliance addresses agency adherence to merit system principles and any required processes.

- E. **Corrective Action.** Corrective action refers to any steps or measures required by OPM to rectify violations of law, rule, Executive order, or regulation. This term is generally used interchangeably with “required action.”
- F. **Data-Driven Decision Making.** Agency leadership implements a systematic, flexible, and inclusive process to gather relevant information from a variety of sources to identify solutions for complex situations and uses the data to support strategic and operational decisions.
- G. **Data Source. A data source is the people or things that are the subject of the evaluation.** Data sources may also be those people or things that directly affect or are directly affected by the people or thing being evaluated. Examples of the techniques used for collecting information from a data source include questionnaires, interviews, and requests for agency reports. Examples of data include agency policies, regulations, and questionnaire results. (See Secondary Data Sources.)
- H. **Delegated Examining (DE) Unit.** The agency or installation component that carries out examining operations that have been specifically delegated to the organization by OPM by means of a signed delegation agreement under the provisions of Title 5, USC, Chapter 11, Section 1104. Delegated examining units are reviewed periodically by OPM evaluators to assure compliance with governing regulations and merit system principles.
- I. **Human Capital Framework.** Provides comprehensive guidance on the principles of strategic human capital management in the federal government. The framework provides direction on human capital planning, implementation, and evaluation in the federal environment.
- J. **Metrics.** A value that indicates the state or level of quality of that which is being measured. Metrics are measurements, either qualitative or quantitative, that provide a basis for evaluating effectiveness and efficiency of performance.
- K. **Recommendation.** A solution that eliminates the true cause of a problem identified during an evaluation of an organization’s HRM program. Recommendations are recommended rather than required when violations of law, regulation, or merit system principles are not involved.
- L. **Sample.** A sample is a representative portion of the population to be analyzed.