



**U.S. Office of Personnel Management
Office of the Inspector General
Office of Investigations & Office of Audits**

Final PMF Report

**Review of the 2017 Presidential Management Fellows
Program Application Process Redesign**

May 18, 2022

OFFICE OF
PERSONNEL MANAGEMENT

Executive Summary

The purpose of this report is to communicate our findings resulting from an Office of the Inspector General (OIG) review pertaining to the Presidential Management Fellows (PMF) Program. We have identified, through inquiry and discussions with U.S. Office of Personnel Management (OPM) personnel directly involved with the PMF Program, recommendations for improving internal controls that would immediately address deficiencies within the Program.

On June 4, 2021, the then Acting OPM Director Kathleen M. McGettigan requested that the OIG conduct an independent review of the redesigned PMF Program application process for the 2017 application cycle. Acting Director McGettigan outlined specific areas for the OIG to review regarding the 2017 PMF application redesign, namely:

- The reason(s) for the redesign;
- The development of the 2017 assessment tools;
- The impact, if any, of the 2017 assessment tools on the diversity of the PMF finalist pool and the adverse impact, if any, on any particular demographic groups;
- When, why, and how the PMF Program became aware of any such adverse impact; and
- Any efforts by the PMF Program to review, mitigate, or respond to any such adverse impact prior to January 2021.

From July 2021 to November 2021, the OIG conducted interviews with OPM and PMF Program personnel to obtain an understanding of the details surrounding the redesigned 2017 application process. Our review of the redesigned 2017 application process determined the following:

- The 2017 application cycle was redesigned in an effort to streamline the selection process.
- The 2017 assessment tools were developed using job analyses and an outside vendor.
- Demographic changes in the program from 2016 to 2017 could not be determined with any certainty due to a flawed data transfer impacting the 2016 applicant flow data.
- We have not been provided any evidence that the PMF Program Office conducted (or requested) any analyses on the applicant flow assessment data from 2016 to 2017 to understand and foster awareness of how and if the 2017 assessment redesign adversely impacted the diversity of the 2017 PMF finalist pool.
- The PMF Program did receive a report from OPM's Human Resources Solutions (HRS) Assessment and Evaluation Branch (AEB) analyzing applicant assessment data from 2017 through 2019, with an emphasis on differences in assessment testing results between racial and ethnic subgroups. However, 2016 was not in the scope of this review; therefore, this report would not serve as a tool to identify how and if the 2017 application assessment redesign impacted 2017 PMF finalist pool demographics as compared to prior to the redesign.



Krista A. Boyd
Inspector General

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Abbreviations

AEB	Assessment and Evaluation Branch
CFR	Code of Federal Regulations
DEIA	Diversity, Equity, Inclusion, and Accessibility
HRS	Human Resource Solutions
LDP	Leadership Development Program
ODEIA	Office of Diversity, Equity, Inclusion, and Accessibility
OIG	Office of the Inspector General
OPM	U.S. Office of Personnel Management
PMF	Presidential Management Fellows
TMS	Talent Management System

Background Information

The Presidential Management Fellows (PMF) Program, administered by OPM, aims to create a career pathway in the Federal Government for individuals interested in public policy and programs. The PMF Program has been operating for over three decades, and now falls under the Pathways Programs, as established by Executive Order 13562, effective July 10, 2012. The Pathways Programs regulatory requirements are set forth in the Code of Federal Regulations, 5 C.F.R. Part 362, and consist of four subparts. The PMF Program-specific requirements are outlined under subpart D of the regulation. The Pathways Programs provides that “agencies should use the Pathways Programs as part of an overall workforce planning strategy to ensure that their workforce is diverse and drawn from all segments of society.”

The PMF Program-specific requirements under subpart D, 5 C.F.R. § 362.401, provide the definition of a Fellow as an individual appointed at the General Schedule (GS)-9, GS-11, or GS-12 level (or equivalent under a non-GS pay and classification system such as the Federal Wage System), in the excepted service under 5 C.F.R. § 213.3402(c). The program administration section under this subpart, 5 C.F.R. § 362.402(c), requires the Director to establish the qualification requirements for applicant evaluation. 5 C.F.R. § 362.403(e) (relating to announcement, eligibility, and selection) provides that “OPM will select Fellow finalists based on an OPM evaluation of each candidate’s experience and accomplishments according to his or her application and the results of a rigorous structured assessment process.”

OPM’s website (<https://www.pmf.gov/about-us/meet-the-team/>) notes that one of the functions of the PMF Program is to “develop strategies for attracting and recruiting graduate students with diverse backgrounds into the PMF Program.” Further, OPM maintains that the PMF Program is evaluated for effectiveness and provides a skillful pool of candidates to Federal agencies. Federal agencies pay OPM a one-time placement fee for each initial appointment, reduce agency recruitment/hiring efforts through use of the PMF Program, and provide selected Fellows with valuable leadership training. The most recent PMF Applicant Handbook, updated on September 30, 2021, offers the infographic below which provides demographic information about PMF program applicants and finalists:



Report Conclusions and Recommendations

2017 PMF Program Redesign Initiative

According to OPM’s “Program Redesign Initiatives and 2017 Recruitment Cycle,” dated October 31, 2016, the PMF Program was redesigned for the 2017 application cycle in an effort to foster an overall streamlined process and better align applicant cycle times with agency opportunities. The 2017 redesign would eliminate the Washington, D.C. in-person assessment and pivot to an all online/one-stage process with four assessment components.

OPM outlined various objectives for the 2017 redesign, such as: producing a credible assessment process; improving agency workforce planning coordination; and recruitment collaboration with academic institutions and other key partners. These objectives were put in place to ensure that the most qualified candidates were aligned with PMF opportunities.

The 2017 redesign initiative document notes that the PMF Talent Acquisition System was updated to provide a better experience and more capabilities for agency PMF Coordinators and Hiring Officials and will become the PMF Talent Management System (TMS).

2017 Assessment Redesign vs. 2016 Assessment

As outlined in the “2017 Assessment Preparation Guide,” the assessment process is used by OPM to select a diverse PMF candidate pool. In 2017, the entire assessment process shifted to a 100 percent online platform consisting of four un-proctored sections. As noted in the guide, three assessment sections – Situational Judgment, Life Experience, and Critical Thinking Skills – implemented time limits ranging from thirty to sixty minutes for completion. The fourth section is an essay task that must be entered in one session but allows for edits up to the closing of the PMF Program application announcement. The 2017 assessment process eliminated the in-person interview. However, this elimination is inconsistent with the Agency’s response to comments regarding PMF program regulations as published in the Federal Register. See Excepted Service, Career and Career-Conditional Employment; and Pathways Programs, 77 Fed. Reg. 28,194, 28,212 (May 11, 2012) which provides “[m]oreover, we have revamped our PMF assessment process to include, among other things, an interview process that has been professionally developed and validated by our industrial psychologists.”

In the 2016 application assessment cycle, there was an online assessment (phase one) consisting of three sections: Situational Judgment Test; Questionnaire; and the essay questions. Each section was un-proctored with no time limits for phase one of the assessment. The only stipulation was that the online assessment had to be completed prior to the PMF Program application announcement closing date, and the essay portion had to be entered in one session with allowance for edits up to the closing of the application announcement. Phase two, which was subsequently removed from the 2017 application cycle (as previously mentioned), consisted of an in-person assessment lasting about five hours, taking place in Washington, D.C. The

“2016 Assessment Preparation Guide” also indicated that the assessment process was used by OPM to select a diverse PMF candidate pool.

Development of the 2017 Assessment Tools

In 2017, the PMF Program office migrated software platforms from Monster Government Solutions to a new vendor, PowerTrain, bringing the application process in-house via the TMS. Additionally, it was conveyed by OPM staff that the 2017 assessment tools were a combination of previously developed assessment tools. The assessment tools consisted of previously developed tools based on a job analysis used by the Assessment and Evaluations Branch (AEB) of Human Resources Solutions (HRS), and tests from contractors. The essay task, specifically, was derived from a contractor, Personnel Decisions Research Institutes.

It was further noted by PMF Program personnel that coordination needed to occur with the AEB due to the PMF Program requiring professional psychologists’ involvement in the assessment process. PMF Program personnel also noted that the Program always consulted subject matter experts from HR Strategy & Evaluation Solutions on the assessments, and that the 2017 redesign was approved by OPM senior officials.

PMF Program Oversight Deficiency

Applicant flow data (demographic information/workforce data) is a vital tool in examining fairness and inclusiveness in the Federal Government’s recruitment efforts. A joint memorandum distributed by OPM and the Equal Employment Opportunity Commission (EEOC), dated March 3, 2010, notes that by “reviewing the yield of an agency’s recruitment effort, the organization can reassess and improve its efforts to reach all segments of our population.” Applicant flow data includes voluntary demographic information which job applicants can provide via the U.S. Office of Management and Budget (OMB) Form No. 3046-0046. Applicant flow data reports (2017 – 2021) provided by PMF Program personnel include Applicant Numbers; Applicant Numbers that scored 70 or above; Finalist Numbers; and Fellow Numbers, sorted by demographic data elements (e.g., gender, ethnicity, race, and disability). The PMF Program has been collecting applicant flow data since approximately 2011.

The PMF Program Records policy document that controls applicant flow data, OPM CENTRAL-11, establishes under the “Purpose(s)” section that the records are used to evaluate program effectiveness and improve operations. Also noted in the policy’s Retention and Disposal section is that: “Application files are maintained for a maximum of (3) years; the automated data base of PMF participant information will be destroyed when no longer needed for administrative purposes. The PMF Program Office maintains a database system tracking all applicant history and program status from 1997 to the present.”

PMF Program personnel determined that complete applicant flow data for periods prior to 2017 does not exist due to a flawed data transfer. Therefore, an analysis to fully evaluate demographic changes in the Finalist Pool specifically from 2016 to 2017 that may have been caused by the redesign (the scope of this review) could not be conducted. In addition, the ability to identify areas where the redesign may have created barriers that may operate to exclude or disadvantage any demographic group, was also precluded by the lack of data for periods prior to the redesign. Furthermore, the system policy document (OPM CENTRAL-11, governing applicant flow data) lacks comprehensive guidance on how the PMF Program should use applicant flow data (if at all), and it is not clear how long applicant flow data (specifically) is retained.

The PMF Program did receive a report from the HRS AEB dated September 30, 2019, titled “Analysis of Applicant Flow in the Presidential Management Fellows Assessment Battery.” This report analyzed applicant assessment data from 2017 through 2019 with an emphasis on testing results between racial and ethnic subgroups and concluded that differences in pass rates were “statistically significant” and consistent over the three-year timeframe. It is noted that “relative pass rate differences were largest between the White and Black subgroups, and smallest between the White and Asian subgroups.” It was further explained in this report that across all years, the Critical Thinking component was the largest contributor to pass rate differences between racial and ethnic subgroups; however, it was also noted that the types of assessment tools were consistent across all years except in some instances where specific content varied due to test form and item assessment revisions. Most significantly though, this analysis does not include applicant data and results from 2016, which would be critical in determining the full impact of the 2017 changes. According to an internal PMF Program document titled “Presidential Management Fellows (PMF) Program Efforts to Improve Diversity, Equity, Inclusion, and Accessibility (DEIA) in the PMF Program,” dated May 14, 2021, the PMF Program Office continued efforts with AEB based on this preliminary analysis to document the current assessment process in full and identify improvements for future assessments.

Even though our office could not assess demographic changes from 2016 to 2017, we did create a snapshot of PMF applicant and finalist pool representation by Race using the provided applicant flow data reports date-stamped July 30, 2021. (Note: we only performed this analysis by Race, but any demographic element could be applied in this illustration.) This snapshot serves as an example of a Workforce Planning review as outlined in Memorandum No. M-17-03 issued by OMB and OPM, dated November 1, 2016. We noted that the Native Hawaiian/Pacific Islander, American Indian/Alaskan Native, and Asian groups consistently represented the smallest percentages of PMF applicants from 2017 through 2021 (see Table I on the following page). We further noted that the Native Hawaiian/Pacific Islander, American Indian/Alaskan Native, and Black/African American groups consistently represented the smallest percentages of PMF finalists from 2017 through 2021 (see Table II on the following page).

Table 1: Yearly % of Applicants to Total Applicant Pool [By Race]					
Race	2017	2018	2019	2020	2021
Native Hawaiian/Pacific Islander	0.4%	0.4%	0.3%	0.5%	0.5%
American Indian/Alaskan Native	1.9%	1.8%	2.0%	1.9%	1.9%
Asian	11.1%	11.1%	11.8%	11.2%	11.9%
Black/African American	17.8%	20.3%	16.2%	18.1%	16.6%
White	61.0%	57.8%	62.0%	61.1%	62.4%
Declined	7.8%	8.6%	7.7%	7.2%	6.7%
Total	100%	100%	100%	100%	100%

Table II: Yearly % of Finalists to Total Finalist Pool [By Race]					
Race	2017	2018	2019	2020	2021
Native Hawaiian/Pacific Islander	0.2%	0.0%	0.3%	0.2%	0.3%
American Indian/Alaskan Native	0.7%	0.7%	1.6%	0.5%	0.5%
Asian	10.6%	9.4%	9.4%	11.1%	11.5%
Black/African American	3.7%	4.7%	4.6%	2.6%	2.8%
White	78.8%	77.4%	76.8%	79.0%	79.0%
Declined	6.0%	7.8%	7.3%	6.6%	5.9%
Total	100%	100%	100%	100%	100%

Overall Conclusion

Based on reviewing several PMF Program documents and conducting interviews with OPM and PMF Program personnel, we have determined that the PMF Program did not adhere to its own agency guidance for evaluating demographic changes from 2016 to 2017 to understand how and if the 2017 application redesign impacted diversity in the 2017 PMF finalist pool. This lack of data evaluation and comparison limits the ability of the PMF Program to identify areas of concern, specifically as it relates to diversity and inclusion, and the ability to make the necessary modifications to address program deficiencies.

According to PMF Program personnel, there was an aggressive initiative to promote participation in the civil service during the 2008 to 2016 White House Administrations, and the number of minority PMF Program applicants either increased or held steady during that period. However, with no applicant flow data for those years, we cannot confirm this. We are also aware of at least one Federal agency that opted out of participating in the PMF Program for a time (e.g., the U.S. Department of State dropped out in 2017). It is unclear if there were other agencies that opted out between 2017 and 2020, which could have also had a negative effect on the diversity of the applicant pool.

OPM requested various aspects of the 2017 PMF application redesign be reviewed by our office; as such, we determined that the PMF Program did not perform the required functions to ensure program effectiveness and systemic program barrier identification. Although OPM noted that

immediate modifications and long-term studies are being conducted for future PMF application cycles, the OIG proposes the following recommendations moving forward:

Recommendation 1

The PMF Program should utilize applicant flow data to conduct organizational analyses in compliance with program regulations and develop robust policies and procedures for this process. The results of this work should be made publicly available.

Recommendation 2

The PMF Program Director and program leaders should maintain demographic analyses on a shared network drive in order to establish and promote cognitive awareness amongst PMF team members, and develop policies and procedures surrounding this practice.

Recommendation 3

The PMF Program should revise any current program documents (such as OPM CENTRAL-11) that lack clear and concise language surrounding the collection and use of applicant flow data.

Recommendation 4 (Draft Report recommendation no. 5)

The PMF Program should implement proper controls to ensure complete and accurate applicant flow data is maintained should there be a system migration/update, and develop policies and procedures surrounding this process.

Recommendation 5 (Draft Report recommendation no. 6)

The PMF Program Director should immediately establish formal diversity and inclusion goals that align with agency guidance and Federal regulations and distribute official guidance on how these goals will be communicated, reviewed, modified, and approved on an annual basis to program staff.

Recommendation 6 (Draft Report recommendation no. 7)

The PMF Program should continue to seek guidance from OPM's Office of Diversity, Equity, Inclusion, and Accessibility (ODEIA) to help memorialize concrete strategies and best practices surrounding Diversity, Equity, Inclusion, and Accessibility initiatives within the PMF Program.

Recommendation 7 (Draft Report recommendation no. 8)

The PMF Program should develop and implement written policies and procedures surrounding the development of the assessment tools for every application cycle. If no assessment revisions occurred, it should be noted as such. Additionally, the Program should incorporate written procedures surrounding the reasons for assessment changes and the approval process for those changes.

Recommendation 8 (Draft Report recommendation no. 9)

The PMF Program should initiate annual internal audits/reviews of program statistics to assess the overall performance of the PMF Program. This review could include the number of participating agencies, demographic make-up of applicants and finalists, and the number of appointed Fellows.

OPM Response to Recommendations

OPM concurred with all but one of our draft recommendations and agreed that the PMF Program Office should use applicant flow data on an annual basis to conduct analyses that would identify program barriers. Further, OPM agreed that current program policies and procedures should be clarified and strengthened to explain when and how the program will conduct these analyses. OPM states they have already taken steps to begin implementing several of the recommendations.

However, OPM disagreed with our position pertaining to the use of 2016 applicant flow data to understand how and if the 2017 application assessment redesign impacted demographics. Specifically, OPM does not agree that “the appropriate methodology includes comparing the applicant flow data for the Class of 2016 application cycle, which used a different assessment, to the applicant flow data for the Class of 2017 application cycle. Rather, a typical barrier analysis involves reviewing and comparing applicant flow data from application cycles using the same assessment. By comparing how applicants fared over multiple cycles using the same assessment measure, a program office will be able to identify trends and determine if a specific assessment measure is a barrier to equal employment opportunity.”

OIG Comment

We interpreted the original request submitted by then Acting OPM Director Kathleen M. McGettigan on June 4, 2021, as being focused on the details surrounding the 2017 redesign and the potential negative impact on demographics resulting from that redesign, as compared to the program demographics prior to 2017. We therefore attempted to compare 2017 applicant flow data to 2016 applicant flow data to understand how and if the redesign impacted 2017 demographics; however, without data prior to 2017, we consider there to be a lack of sufficient

information to adequately perform this comparison. OPM's June 4, 2021, request for review is attached as Appendix A.

In OPM's response to the draft report, on February 25, 2022, it stated that a typical barrier analysis consists of comparing multiple application cycles that used the same assessment measure to identify trends and determine if a specific measure is a barrier to equal employment opportunity. Based on this description of a typical barrier analysis, the PMF Program Office has an example of this type of analysis readily available, the "Analysis of Applicant Flow in the Presidential Management Fellows Assessment Battery," report issued by AEB on September 30, 2019 (we previously discussed AEB conclusions on pg. 4 of this report). As stated by AEB, "PMF applicant assessment data from 2017 to 2019 were analyzed to study differences in testing outcomes between racial and ethnic subgroups defined by OMB and the Uniform Guidelines on Employee Selection Procedures (29 CFR Part 1607)." OPM's February 25, 2022, response to the draft report is attached as Appendix B.

Appendix A

Presidential Management Fellows (PMF) Program Request received June 4, 2021

Memorandum for Norbert E. Vint
Acting Inspector General
Office of the Inspector General

From: Kathleen M. McGettigan
Acting Director
Subject: Presidential Management Fellows (PMF) Program

As you know, the U.S. Office of Personnel Management (OPM) administers the Presidential Management Fellows (PMF) Program. Since 1977, the PMF Program has been the Federal government's flagship leadership development program for individuals with advanced degrees. The PMF Program is designed to help develop a cadre of potential Federal government leaders.

OPM identifies PMF finalists who, in turn, have an opportunity to interview with agencies and be considered by them for two-year excepted service appointments as PMF Fellows at agencies. If a Fellow successfully completes the fellowship, the agency may convert the appointment to an appointment to a permanent position. To become a PMF finalist, individuals must participate in a rigorous application and assessment process, which is intended to measure the competencies needed by PMFs and give applicants the opportunity to demonstrate their leadership ability and potential. In 2016, the application and assessment process was redesigned for the 2017 application cycle. The redesign moved the application to an all-online one-stage process with four assessment components, eliminating an in-person assessment in Washington, D.C. I understand that the purpose of the redesign was to streamline the application process; reduce the financial burden on applicants by removing the requirement to travel for the in-person assessment; better align the application time frame with other post-graduation employment opportunities; and reduce staff time and operational costs for the PMF Program.

It has recently come to my attention that the redesigned application process has also impacted diversity in the PMF finalist pool. Following the redesign, it appears that PMF finalists from certain demographic groups dropped. OPM has been working hard to understand the cause of the impact and change the assessment model to produce a more diverse finalist pool. OPM plans to make critical modifications to the assessment model for the 2022 application cycle, which will open this summer, and has planned a longer-term holistic study of the PMF application and assessment process, which will result in a comprehensive review and update for future application cycles.

As OPM undertakes this important work, the agency would like to request that your office independently review the following circumstances surrounding the redesign to the PMF application process for the 2017 application cycle:

- The reason(s) for the redesign;
- The development of the 2017 assessment tools;
- The impact, if any, of the 2017 assessment tools on the diversity of the PMF finalist pool and the adverse impact, if any, on any particular demographic groups;
- When, why, and how the PMF Program became aware of any such adverse impact; and
- Any efforts by the PMF Program to review, mitigate, or respond to any such adverse impact prior to January 2021.

OPM believes strongly in the value of diversity in the federal workforce and in the PMF Program specifically. As an agency, we are dismayed that the redesign of the PMF application process may have impacted diversity in that Program and that any such impact has continued through four application cycles. We seek from OIG a transparent accounting of how that occurred so that the agency may learn from the past as we take steps towards ensuring that our unwavering commitment to diversity is effectively implemented in the PMF Program going forward.

If you have any questions, please contact Lynn Eisenberg or me.

Appendix B

Presidential Management Fellows (PMF) Program Review Draft Response, received February 25, 2022

Norbert E. Vint
Acting Inspector General
Office of the Inspector General
1900 E Street, NW
Washington, D.C. 20415-1000

Dear Mr. Vint:

This letter is in response to your January 27, 2022, draft review report entitled, "Review of the 2017 Presidential Management Fellows Program Application Process Redesign." I appreciate the work that went into this review and the opportunity to provide you with additional information and responses.

On June 4, 2021, Acting Director Kathleen McGettigan requested that your office undertake a review of a redesign of the application process for the Presidential Management Fellows (PMF) Program, which was for the Class of 2017 application cycle. OPM requested that your office conduct an independent review of the circumstances surrounding the redesign after the Acting Director became aware that the redesigned application process impacted diversity in the PMF finalist pool. While OPM sought a transparent, independent review from your office to inform changes going forward, we also undertook immediate steps to make the 2022 PMF application process more inclusive while ensuring that the PMF program was selecting the strongest possible finalists. OPM also conducted a thorough review of all elements of the PMF program, from recruitment to the selection process, to program administration and training. Some of the steps OPM has taken include:

- **Job Application and Assessment Process:** The PMF Program Office is presently undergoing a full job analysis for its assessment process. This analysis involves reaching out to key stakeholders in the PMF community (e.g., alumni, agency coordinators, and hiring managers) to determine which skills and competencies are required to be a successful Presidential Management Fellow, and to redesign the assessment for the application process accordingly. For the 2022 PMF application cycle, we revised our assessment process to address those areas that seemed to be causing some of the reductions in the overall diversity of finalists.
- **Recruitment:** The PMF Program Office has enhanced its recruitment efforts by strengthening ties with the alumni community and contracting with a networking platform to better reach candidates from all segments of society.
- **Leadership Development Program (LDP) Training Curriculum:** The process of redesigning the LDP training program began prior to the September 2021 LDP program. The PMF Program Office worked closely with OPM's Office of Diversity, Equity,

Inclusion, and Accessibility (ODEIA) to ensure that content for the September 2021 training was infused with a diversity, equity, and inclusion (DEIA) lens, and sought feedback from participants on the quality of the LDP program (including the new DEIA components). The larger training curriculum is also in the process of being redesigned, in consultation with ODEIA to ensure it incorporates best practices on leadership and addressed government's most pressing challenges.

- **Listening Sessions:** PMF leadership has held several listening sessions with current PMF fellows and alumni to hear their feedback and suggestions.

We take seriously the responsibility we have to the public in establishing the federal government as a model employer that best uses all the tools at our disposal to attract top talent to the federal workforce, including through the recruitment, hiring, and training of Presidential Management Fellows. We are proud of the steps we have taken to date to ensure that our commitment to DEIA is reflected in the PMF Program's application process and more broadly, and we appreciate the work your office has done to identify additional areas for continued improvement.

Responses to Recommendations

As a general matter, OPM agrees that the PMF Program Office should annually conduct data-based barrier analyses and that applicant flow data is an essential tool for completing such work. With respect to understanding the impact of the 2017 redesign, however, OPM does not agree that the appropriate methodology includes comparing the applicant flow data for the Class of 2016 application cycle, which used a different assessment, to the applicant flow data for the Class of 2017 application cycle. Rather, a typical barrier analysis involves reviewing and comparing applicant flow data from application cycles using the same assessment. By comparing how applicants fared over multiple cycles using the same assessment measure, a program office will be able to identify trends and determine if a specific assessment measure is a barrier to equal employment opportunity. Indeed, it would be problematic and would necessitate further action if we determined that the assessment instituted during the 2017 redesign created a barrier to equal employment opportunity regardless of whether it appeared to create a barrier as compared to a previous assessment.¹

Despite our disagreement over the appropriate methodology for a barrier analysis in this instance, OPM concurs with most of your office's recommendations.

¹ See *Watson v. Fort Worth Bank and Trust*, 487 U.S. 977, 994-995 (prima facie case of disparate impact involves isolating and identifying the specific employment practice responsible for the statistical disparity and proving the causation between the specific selection procedure and its impact on a demographic group); see also 29 C.F.R. 1607.4; *Testing and Assessment: An Employer's Guide to Good Practices*, U.S. Dep't of Labor 1999 at Chapter 3; and *Instructions to Federal Agencies for EEO MD 715, Section II: Barrier Identification and Elimination*, EEOC.

Recommendations 1, 2, 3, and 9

Although the PMF Program has some internal control policies and procedures addressing the retention and annual use of applicant flow data, OPM agrees that these policies and procedures should be clarified and strengthened to explain when and how the program office will conduct barrier analyses. For example, the System of Records Notice for the PMF Program Records, referred to as OPM Central-11, will be revised to clarify that applicant flow data may be used to analyze recruitment efforts and assess any adverse impact in the application process. This same clarification will also be made in the PMF Program's Standard Operating Procedure No. 29. Regarding whether such resulting analyses would be made public or how such data should be maintained in PMF Program records systems, OPM believes that such data and any resulting analyses should be maintained and disseminated consistent with all applicable statutes, regulations, system of records notices, and internal policies and procedures.

Recommendation 4

Deleted by the OIG – Not Relevant to Final



Recommendation 5

OPM concurs that the PMF Program should develop more robust internal controls relating to applicant flow data and system migrations and updates. For example, the PMF Program Office will adopt a Standard Operating Procedure that details actions the Program Office will take before updating systems or migrating data to protect the data during such an update or transfer. While the PMF Program Office has already taken some steps towards addressing this concern, including adding language concerning data protection requirements in vendor contracts, the program office should ensure that such language requires data integrity and retention during system migrations or updates. OPM will also review OPM Central-11 and revise it as necessary.

Recommendation 6

OPM agrees with this recommendation and believes we have already taken steps to establish diversity and inclusion goals that align with the [Government-Wide Strategic Plan to Advance Diversity, Equity, Accessibility, and Inclusion in the Federal Workforce](#). Specifically, the Program is setting forth processes to seek to build a diverse and qualified workforce through an

open and fair process consistent with merit system principles and ensure that the Program should provide opportunities for fellows to learn, develop, and grow.

Recommendation 7

OPM agrees that the PMF Program Office should work closely with OPM's ODEIA to develop and execute on best practices on relevant DEIA initiatives. This process has already begun as the PMF Program Office has been consulting with ODEIA on best practices as they relate to all parts of the PMF Program Office including recruitment, selection, hiring, and training.

Recommendation 8

OPM agrees that the PMF Program Office should develop written policies and procedures regarding development of its assessment tools and a process for determining whether they should be revised. OPM also agrees that the PMF Program Office should document reasons for assessment changes as well as the approval process for those changes.

Conclusion

As I noted, we appreciate the opportunity to respond to this interim report and share the steps OPM has taken to remove barriers and advance diversity in the PMF Program going forward. We look forward to your final report and findings.

Sincerely,

A handwritten signature in blue ink that reads "Kiran A. Ahuja". The signature is written in a cursive, flowing style.

Kiran A. Ahuja



Report Fraud, Waste, and Mismanagement

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