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FEDERAL PERSONNEL AND COMPENSATION DIVISION

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JANUARY 29, 1982

The Honorable David H. Pryor Ranking Minority Member Subcommittee on Civil Service Senate Committee on Governmental Affairs

The Honorable Jim Sasser Ranking Minority Member Subcommittee on Intergovernmental Relations Senate Committee on Governmental Affairs



Federal Employee Use of Off-Campus College and Subject: University Programs (FPCD-82-14)

This report responds to the June 12, 1981, request, and later discussion with your subcommittee offices, regarding (1) the use of off-campus college and university programs to train Federal employees and (2) other training matters. As you requested, we reviewed the November 11, 1980, Washington Post article entitled "Off-Campus: Scholars for Dollars" to determine this subject's potential for further General Accounting Office (GAO) study.

The article discussed off-campus programs operated in the Washington, D.C., area by colleges and universities whose main campuses were several hundred miles away. According to the article, these programs are producing degree holders of dubious quality while providing a significant source of revenue to these institutions. The article also stated that the Government may be paying the tuition costs of these programs for thousands of Federal employees and that the benefits of these expenditures may be questionable.

At your request, we also obtained information on the following subjects:

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- -- The authorities used by Federal agencies to fund off-campus training programs.
- --How the training programs are evaluated for their effectiveness.
- -- The amount spent by agencies on off-campus programs.
- --How such training programs are relied upon for promoting employees.
- --The use of "in-house" training programs, such as the Federal Executive Institute, and why off-campus programs are necessary in addition to the "in-house" programs.
- --Information on professional development seminars and dues for professional associations.

The enclosure responds to the specific questions in your request letter. As the enclosure indicates, our review of the matters discussed in the Washington Post article did not identify any areas that appear to warrant detailed study. We have discussed our review findings with members of your subcommittee offices, and they have agreed that further audit work is not necessary at this time.

To respond to your request, we reviewed (1) laws and Office of Personnel Management (OPM) and agency guidance relating to training Federal employees and (2) OPM training reports and previous GAO training studies. We examined fiscal year 1980 training approval forms at two Department of Commerce activities—headquarters of the International Trade Administration (ITA) and headquarters of the National Oceanic and Atmospheric Administration (NOAA)—and at the Department of the Army installation at Fort Belvoir, Virginia. We selected Department of Commerce activities for examination because, according to OPM officials, about one-half of the Department's training is external short-term training. A Department of the Army installation was chosen because the Army has a large external short-term training budget (over \$8 million in fiscal year 1980).

To determine the criteria that the higher education accreditation associations used to evaluate an off-campus program's quality, we reviewed accrediting criteria of the North Central and Middle States Associations of Colleges and Schools. We also reviewed licensing criteria used by the Commonwealth of Virginia and the District of Columbia educational licensure commissions. Further, we obtained and compared off-campus

program tuition costs with the tuition costs at colleges and universities in the Washington, D.C. area, and at the main campuses of the institutions operating the off-campus programs.

To obtain views on off-campus programs and other training matters, we interviewed training and personnel officials at OPM, the headquarters of the Departments of the Army and Commerce, and the three activities we visited. Also, we spoke with members of the accreditation associations and state educational licensure commissions. At the activities we visited, we interviewed those employees we were able to contact who took 26 off-campus courses during fiscal year 1980 to obtain their views on the courses' quality and usefulness. Our review was performed during the period August through November 1981.

At the request of your subcommittee offices, we did not obtain official comments from the agencies. However, we discussed the information in this report with agency officials at OPM and at the Departments of the Army and Commerce.

Clifford I. Gould Diffector

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RESPONSES TO SPECIFIC QUESTIONS IN

LETTER OF REQUEST

Question 1

Does the Washington Post article, "Off-Campus: Scholars for Dollars," indicate potential for further GAO study?

Response

The November 11, 1980, article "Off-Campus: Scholars for Dollars" discussed off-campus programs of colleges and universities where the main campuses were several hundred miles from the programs. According to the article, these programs are producing degree holders of dubious quality while providing a significant source of revenue to the institutions. It also stated that the Government may be paying the tuition costs of these programs for thousands of Federal employees and that the benefits of these expenditures may be questionable.

Our review of the matters discussed in the article indicated that further study of the subject is not warranted at this time. Our principal observations relating to these matters are summarized below.

There is no summary data available showing the Government's total costs for off-campus programs. However, Federal expenditures for these programs at the three activities we visited were small in relation to total external short-term training costs. 1/ At these three activities, off-campus costs ranged from 0 percent to 3.2 percent of total external short-term training costs during fiscal year 1980, as shown in the following table:

	Expenditures for off-campus training	Total expenditures for external short-term training	Percentage of off-campus costs to total external short- term costs
Fort Belvoir	\$12,807	\$400,000	3.2
ITA	0	140,000	0
NOAA	2,112	612,400	0.3

^{1/}OPM defines external short-term training as any training of 120 days or less provided by non-Government sources such as State and local governments and universities.

 $(x_0,x_0) = \frac{1}{2} \left(\frac{1}{2} \left(\frac{x_0}{x_0} + \frac{x_0}{x_0} \right) \right)^{\frac{1}{2}} \left(\frac{x_0}{x_0} + \frac{x_0}{x_0} \right)^{\frac{1$

The use of off-campus training at these activities was also limited. The following table shows that the occurrences of off-campus training ranged from 0 percent to 1.9 percent of all external short-term training occurrences during fiscal year 1980.

	Number of off-campus training occurrences	All external short-term training occurrences	Percentage of off-campus occurrences to total occurrences
Fort Belvoir	38	2,000	1.9
ITA	0	750	0
NOAA	9	3,787	0.2

The fees charged for most of the off-campus programs we identified were comparable to the costs on the institutions' main campuses.

	Off-campus cost per credit hour	On-campus cost per credit hour	Academic <u>year</u>
University of Southern California	\$205	<u>a</u> /\$205	1980-81
Central Michigan University	\$ 90	\$ 95 (non- resident)	1981-82
University of Virginia	\$ 65	<u>a</u> /\$ 65	1981-82
Virginia Polytechnic Institute	\$ 47	<u>a</u> /\$ 44	1981-82
Johns Hopkins University	\$731 (per course)	a/\$731 (per course)	1980-81
University of California at Los Angeles	\$ 65	\$ 88 (non- resident)	winter 1982
Pepperdine University	\$176 - \$184	\$176- <u>a</u> /\$184	1981-82
Southern Illinois University	\$100	\$ 60 (non- resident)	1981-82

a/Costs shown are the same for both resident and non-resident students.

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The cost per credit hour, the use of non-staff professors, and the time spent in class at these off-campus programs are comparable to those of six Washington, D.C., area colleges and universities—the American University, George Washington University, Georgetown University, George Mason University, Catholic University, and the University of Maryland.

We spoke with those Federal employees we were able to contact who participated in 26 off-campus programs during fiscal year 1980. Participants in 18 of 20 courses at Fort Belvoir and 4 of 6 courses at NOAA said that the off-campus courses were of equal or higher quality than the on-campus courses they had taken. All participants reported that the courses were job related. Participants in 19 of 20 courses at Fort Belvoir and 5 of 6 courses at NOAA said they were using the skills acquired in the courses in their work.

All the off-campus programs we identified have been reviewed and licensed by accreditation associations and licensure commissions and meet these groups' minimum standards. Accreditation association representatives and others knowledgeable in the area of higher education stated that nontraditional programs, such as off-campus programs, are not improper. Many people cannot attend college courses in a traditional, on-campus, full-time situation and need an alternative, such as the off-campus programs.

Question 2

What authorities are used by Federal agencies to fund off-campus training?

Response

The Government Employees Training Act of 1958 (5 U.S.C. 4101 et seq. (1976)) is the basic statute authorizing training for Federal employees. Executive Order 11348 provides agency heads with additional direction on using the general authority. Both the law and the Executive order authorize OPM to issue regulations and guidance to implement the law. OPM uses the Federal Personnel Manual, Chapter 410--"Training"--to prescribe policy guidance and requirements for managing training in the Government.

In general, these authorities allow agencies to provide training necessary to develop the skills, knowledge, and abilities that employees need to perform their official duties. Specifically, an agency can send employees to non-Government

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facilities, including off-campus programs, for training that is not readily available within the Government. Agencies are authorized to pay for all or any part of this training.

Question 3

How are training programs evaluated for their effective-

Response

Agency officials with whom we spoke agreed that there was little in-depth evaluation done of Federal training. Although the training approval forms provide space for the user to evaluate the course, this evaluative information is mainly used by agencies as a record that the course was successfully completed rather than as an assessment of the course's value.

OPM and training officials at the agencies we reviewed made the following comments about the evaluation of training effectiveness:

- --OPM has delegated the responsibility for training evaluation to the agencies. However, the agencies are, for the most part, not performing this function.
- -- OPM provides little quidance in evaluation methodology.
- --There are no effective mechanisms available to evaluate training. This does not mean, however, that because training is difficult to evaluate or has not been evaluated, it has no value to the Government.
- --There is no agency commitment to an evaluation effort. Both staff time and money would be needed to design an evaluation system and to administer it. There would also be a need to insure that the resources spent would not exceed the value derived from the effort.
- --Agencies, for the most part, are doing little to assess the needs for training and what the training is to accomplish before approval is given. Without this assessment, it is difficult to evaluate training effectiveness.

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Lack of training evaluation is not a new problem. We discussed this problem in an earlier report to the Congress

("Better Evaluation Needed For Federal Civilian Employee Training," FPCD-75-120, August 12, 1975). In this report, we stated that the evaluation requirements of the Government Employees Training Act and Executive Order 11348 were, for the most part, not being adequately met and that

- --plans made to develop courses often lacked effective postcourse evaluation features;
- -- the use of job performance measures after training as an evaluative technique was varied and, in many cases, so limited that effective evaluation was impossible; and
- --many department officials were dissatisfied with the level of evaluation, but lacked the resources to do more.

In view of these and other problems, we recommended that the Civil Service Commission (now OPM) provide leadership and guidance to work with Federal agencies and departments to correct the identified problems. We also recommended that the Commission take a stronger role in promoting the evaluation of training.

We also reported on this problem in a 1977 report to the Chairman, Civil Service Commission ("The Government Employees Training Act of 1958: A Progress Report," FPCD-77-66, November 17, 1977). This report stated that agencies were still not effectively evaluating their training programs. We recommended that the Civil Service Commission, with the Office of Management and Budget, construct minimum evaluation standards that all Government departments and agencies should meet.

OPM, in a March 1979 report, also discussed the lack of evaluation. The report stated that many trainers do not have the time, skill, or incentives to do effective evaluations. This report also mentioned the lack of information on the relationship of training to job performance. The report recommended actions by both OPM and the Office of Management and Budget to aid in the evaluation effort.

Our study indicated that there have been no significant improvements in the training evaluation area since the issuance of these reports.

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Question 4

How much money is spent by agencies on off-campus training programs?

Response

As we stated earlier, there is no summary data available showing the Government's total costs for off-campus programs. These costs are included in the OPM training category "external short-term training." This category includes any training of 120 days or less provided by non-Government sources such as State and local governments and universities.

Question 5

Are off-campus training programs relied upon for promoting employees?

Response

In a July 13, 1981, written response to questions raised by the Senate Committee on Appropriations, an OPM official stated that, all other things being equal, advanced degrees could help an individual in career advancement.

However, according to agency training and personnel officials, any courses or degrees beyond those necessary to initially obtain a position are not used as a basis to promote employees. Agency officials said that this additional training is seen primarily as an indication of interest in the job and of the employee's personal ambition.

Question 6

How much training is done "in-house" and why are off-campus programs necessary in addition to this "in-house" training?

Response

OPM and agency training officials believe that much can be done through Federal training programs. Both formal class-room training, such as agency in-house courses and interagency courses, and on-the-job training programs are used to train Federal employees. The officials said that the Government cannot provide training in all disciplines, and therefore, must supplement these programs with courses from non-Government sources, such as colleges and universities.

During fiscal year 1980, the costs and number of formal training occurrences in the Government programs were:

	Cost	Occurrences	
Agency in-house training	\$233,508,152	509,350	
Interagency training	28,311,750	113,247	

Question 7

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How much is spent on professional development seminars and dues for professional societies?

Response

Training officials informed us that all training can be defined as professional development. In agreement with the subcommittees' offices, we have defined professional development seminars as all non-Government short-term training excluding regular college and university courses, interagency courses, and agency-specific courses.

Government-wide cost data for such seminars are not centrally maintained or readily available. Using OPM training purpose categories, however, we developed estimates of fiscal year 1980 seminar costs for the activities we visited.

	NOAA	ITA	Fort Belvoir
Executive and management	\$ 5,655	\$ 9,543	\$ 13,010
Supervisory	1,075	6,443	22,945
Legal, medical, scientific,			
engineering	51,995	2,204	31,238
Administrative and analytic	13,142	3,592	7,297
Specialty and technical	177,187	16,330	70,561
Clerical	13,087	1,911	13,673
Trade or craft	849	0	15,530
Orientation	20,995	2,752	27,555
Totals	\$283,985	\$42,775	\$201,809

We found no instances where training funds were spent on dues for professional societies. Agency officials said that if dues were included in the total cost of an approved conference, those costs were paid as part of the conference cost. However, the training forms are not designed to show dues as a cost separate from other conference costs. Further, while training officials said that there may be instances where dues are paid from funds other than training, they could not identify such payments.

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