

**Human Capital Management:
Lack of Priority Has Slowed OIG-Recommended
Actions to Improve Human Capital Management,
Training, and Employee Development Practices**

Report No. E-11-04

July 8, 2011



Evaluation Report Issued By

**NATIONAL RAILROAD PASSENGER CORPORATION
OFFICE OF INSPECTOR GENERAL
10 G STREET, N.E.
WASHINGTON, D.C. 20002**



The Inspector General

Memorandum

To: Joseph H. Boardman
President and CEO

From: Ted Alves 

Date: July 8, 2011

Subject: *Human Capital Management: Lack of Priority Has Slowed OIG-Recommended Actions to Improve Human Capital Management, Training, and Employee Development Practices (Report E-11-04)*

This report presents the results of our follow-up review of recent OIG evaluations of human capital management (E-09-03, May 15, 2009) and training and employee development (E-09-06, October 26, 2009). Knowing of your concern with improving human capital management, training, and employee development practices at Amtrak, we initiated this review to determine Amtrak's progress in implementing the recommendations in those evaluations and to assess the causes for any delays.

RESULTS IN BRIEF

Two years after the OIG issued 24 recommendations designed to improve Amtrak's human capital management practices and 19 months after the OIG issued 27 recommendations to improve training and employee development practices at Amtrak, the Human Resources, Labor Administration and Diversity Initiatives (HR, LA & DI) Department has made only limited progress in implementing the recommendations. In addition, in several cases, the planned actions that HR, LA & DI identified to correct

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significant deficiencies are not responsive to the recommendations and would not address the underlying problems; in some cases, progress was exaggerated. As a result, Amtrak continues to suffer from outdated human capital management, training, and employee development processes that hinder its ability to perform effectively. Further, Amtrak is increasingly at risk of encountering skills shortages as highly experienced, long-time employees retire.

HR has attributed this lack of progress to several causes, most of which we do not consider valid:

- a new Federal Railroad Administration (FRA)-proposed regulation governing training;
- the lack of funding for Employee Information Management Phase 4, and
- the High Performance Organization (HPO) initiative.

In reality, this lack of appreciable progress has occurred because implementing these recommendations has not been a priority for Amtrak. This is demonstrated by the absence of sustained, focused attention on implementing these recommended actions, and by the limited resources applied. In fact, the former Vice President for HR, LA, and DI acknowledged that implementing these recommendations had not been a priority for Amtrak.¹

To address this situation, we are recommending that the President and CEO (1) make improved human capital management, training, and employee development a clearly articulated priority for the soon-to-be-hired Chief Human Capital Officer, as well as for all executives and managers at Amtrak; and (2) direct the Chief Human Capital Officer to revise the Human Capital Action Plan to include actions that are responsive to the recommendations and with reasonable implementation time frames.

In commenting on a draft of this report, in a meeting with the Inspector General and in Amtrak's written response (see Appendix I), Amtrak's President and CEO agreed with our recommendations and committed to tasking the new Chief Human Capital Officer with developing an action plan to address our findings and recommendations within 60 days of his/her arrival. We support this approach.

¹ The former Vice President for HR, LA, and DI retired from Amtrak effective April 1, 2011.

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BACKGROUND

In late 2007, we began an evaluation of Amtrak's human capital management; this was subsequently divided into two separate evaluations, one addressing the broader subject of human capital management and the other focusing more specifically on training and employee development. Both were comprehensive efforts that compared Amtrak's practices against leading industry practices and incorporated benchmarks to other companies, including other large railroads. In 2009, we issued separate reports containing the results of these evaluations:

Our May 2009 report on human capital management (Report E-09-03) contained the following six findings:

- Amtrak does not conduct comprehensive strategic workforce planning to ensure it has a workforce with the requisite knowledge and skills to meet the company's future needs.
- No clear, comprehensive "total compensation" philosophy and strategy exist to ensure pay practices are applied consistently and effectively, and aligned to support Amtrak's strategic plans.
- Amtrak's current recruitment process is relatively slow in filling vacant positions with high-performing individuals who meet the company's business requirements.
- Amtrak does not have a coordinated retention strategy.
- Amtrak currently does not have the information technology tools needed to perform its HR functions effectively and efficiently.
- Amtrak is not optimally organized to support strategic management of human capital.

The report included 24 recommendations associated with these findings. In its response, dated June 4, 2009, Amtrak agreed with 22 of the report's recommendations. With regard to our two recommendations for a new organizational structure to support human capital management, Amtrak agreed that organizational changes were warranted, but disagreed with combining the Labor Relations (LR) Department with the Human Resources and Diversity Initiatives (HR & DI) Department, and placing

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them under a single Chief Human Capital Officer. In August 2010 this decision was reversed, and the LR Department was combined with HR & DI to form the Human Resources, Labor Administration, and Diversity Initiatives Department.

Our October 2009 report on training and employee development (Report E-09-06) contained 16 findings covering two major areas—employee training and management employee career development.

- The major employee training finding was that Amtrak has no comprehensive, corporate-wide strategy linking employee development and training with Amtrak’s strategic goals and objectives. Other findings addressed Amtrak’s new-hire-orientation program, job-specific initial training, training and certification of instructors, and the overall efficiency of training delivery.
- The major management employee career development finding was that Amtrak likewise lacks a comprehensive, integrated, corporate-wide career development strategy for management (non-agreement²) employees. Other findings addressed screening of management candidates, the management associate program, educational standards, documented career paths and job families, cross-departmental competencies, and leadership training.

Amtrak agreed with all 27 of the report’s recommendations.

Amtrak’s Human Capital Action Plan. On August 30, 2010, Amtrak provided us with its Human Capital Action Plan (HCAP) outlining the actions planned and accomplished in addressing these 51 recommendations. The plan was updated in December 2010 and again in March and April 2011.

SCOPE AND METHODOLOGY

To evaluate Amtrak’s progress in implementing these recommendations, we started by conducting a detailed review of each of the 27 recommendations from the training and

² “Non-agreement” employees generally are those not covered by collectively-bargained union contracts.

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employee development report, using Amtrak's HCAP as a guide. For each recommendation we interviewed the Amtrak senior managers identified as the responsible party in the action plan. We also requested and reviewed any documents and other evidence of progress either mentioned during our interviews or identified in the action plan as being associated with the recommendations. We then performed a similar review of the 24 recommendations from the human capital management report.

FINDINGS

Amtrak Has Made Only Limited Progress in Implementing the Recommendations

The results from the detailed review of the 27 recommendations contained in the training and employee development report follow:

- 2 (7 percent) were complete or substantially complete;
- 4 (15 percent) had some progress; and
- 21 (78 percent) had little or no progress, including the key recommendations that Amtrak issue
 - a corporate-wide strategy for training and employee development, providing guidance to the corporation on the linkage of training and employee development to the achievement of Amtrak's strategic goals and objectives; and
 - a corporate-wide strategy for developing management employees to assume future leadership roles within the company.

The results from the detailed review of the 24 recommendations contained in the human capital management report were similar:

- 0 were complete or substantially complete;
- 10 (42 percent) had some progress; and
- 14 (58 percent) had little or no progress, including the key recommendations that Amtrak
 - involve top management, employees, and stakeholders in developing, communicating, and implementing a strategic workforce plan to enable Amtrak

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to identify, develop, and sustain the workforce skills needed to successfully accomplish Amtrak's business strategy while balancing career and lifestyle goals of its employees;

- create an overall human capital recruitment strategy, involving all stakeholders, that identifies Amtrak's critical positions and the techniques to be used to fill them as quickly as possible; and
- develop a corporate retention strategy that aligns with and supports the overall human capital strategic plan.

Overall, for the two reports, only two recommendations have been fully implemented. For over two-thirds of the recommendations, little to no progress has been made in the 19–24 months since the two reports were issued. Appendix II includes a copy of Amtrak's latest action plan (April 29, 2011), annotated with two additional columns reflecting the results of our review.

The Action Plan Provided Unconvincing Reasons for Lack of Progress

During interviews and in numerous places in the action plan, three items were cited repeatedly as significant obstacles to further progress in implementing the recommendations:

1. the new Federal Railroad Administration (FRA)-proposed regulation governing training,
2. the lack of funding for Employee Information Management (EIM)³ Phase 4, and
3. the High-Performance Organization (HPO)⁴ initiative.

We do not see any of these items as valid obstacles to moving forward in implementing the recommendations.

³ Employee Information Management (EIM) is a multi-phased initiative to improve HR systems and processes through the implementation of business software.

⁴ The High-Performance Organization (HPO) initiative is an approach to organizational change designed to build a high-performance organization. This approach was developed by the Commonwealth Center for High-Performance Organizations, Inc.

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New FRA-proposed regulation. The Rail Safety Improvement Act of 2008 mandated that FRA develop new rules to ensure that safety-related railroad employees (as newly-defined) are trained and qualified on any federal railroad safety laws, regulations, and orders with which the employees are required to comply. To comply with this law, FRA formed a Rail Safety Advisory Committee. This FRA Working Group consisted of approximately 70 people representing rail labor, rail management, and rail contractors. This group reached consensus on the rulemaking during a teleconference on November 23, 2010.

The summary presentation developed and reported by FRA indicates that most of the proposed rulemaking would not affect the majority of Amtrak's current training programs, nor would the changes limit Amtrak's ability to implement our recommendations. Therefore, listing the FRA rulemaking as a reason for not moving forward in implementing the recommendations is unjustified. At most, the new rules could have caused some minor modifications to polices. This item was cited as a reason for delay in over a third of all of the training recommendations.

Lack of Funding for EIM Phase 4. EIM Phase 3 was completed in May 2010. According to interviews with Amtrak's Information Technology (IT) Department, all EIM functions intended to support training and employee development were included in EIM Phase 3.

The need for a fully loaded and functioning qualifications catalog in EIM is cited numerous times in HR's updated progress report as an obstacle to implementing our training and employee development recommendations. This function is available; however, not all of the data needed for the system to be used as envisioned have been entered. Efforts to systematically upload HR data could generate increased costs, yet we were told that cost estimates to upload the data were never discussed with IT by HR, and should be separate from future funding issues associated with EIM Phase 4. Any reference to EIM Phase 4 funding issues as an obstacle to implementing our training and employee development recommendations is, therefore, misleading.

HPO Initiative. Amtrak's president launched an initiative in July 2010 to learn about and adopt the High-Performance Organization management approach at Amtrak. Although this initiative may result in some organizational changes and an emphasis placed in new areas, the vast majority of the training and employee development needs

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at Amtrak will not change. This initiative should not stop Amtrak from moving forward on implementing our recommendations. In fact, implementing these recommendations is essential to establishing a foundation for the High-Performance Organization to succeed.

HCAP Actions Are Not Consistently Responsive to the Intent of the Recommendations

Despite ultimately agreeing with all of the recommendations in our two reports and outlining actions aimed at implementing them, some of these actions are not responsive to the intent of the recommendations. For example:

Workforce Planning. Recommendation 1A from the human capital management report states that Amtrak should “involve top management, employees, and stakeholders in developing, communicating, and implementing a strategic workforce plan to enable Amtrak to identify, develop, and sustain the workforce skills needed. . . .” This recommendation was based on the results of a 2003 study by the (now) U. S. Government Accountability Office (GAO) that identified five key principles for effective workforce planning. As discussed in our report, GAO found that

efforts that address key organizational issues, like strategic workforce planning, are most likely to succeed if, at their outset, organizations’ top program and [human capital] leaders set the overall direction, pace, tone, and goals of the effort, and involve employees and other stakeholders in establishing a communication strategy that creates shared expectations for the outcome of the process.⁵

Neither the actions discussed in the HCAP nor those that have been accomplished to date directly address this recommendation. The actions that have been completed for this recommendation are focused mainly on succession planning for senior employees (Amtrak pay grade D2 and above), and the interaction has been between human resources managers and the leadership of individual departments. Top leaders have not set the overall direction and goals for this undertaking, nor has a strategy been developed to communicate the expected outcome of strategic workforce planning.

⁵ U.S. General Accounting Office, *Human Capital: Key Principles for Effective Strategic Workforce Planning* (Washington, D.C.: GAO-04-39, December 11, 2003).

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Without a strong strategic workforce plan, Amtrak cannot be assured that it will have the employee skills needed to attain its business goals, both now and in the future. Unless top leaders demonstrate their involvement and support for workforce planning, this effort will be unlikely to succeed.

Compensation Strategy. Recommendation 2A from the human capital management report states that Amtrak should “implement a written, Board of Directors-approved, comprehensive total compensation philosophy and strategy that addresses base pay, premium pay, variable pay, benefits, and work-life flexibilities. This philosophy and strategy must be linked to the company’s strategic human capital plan and address agreement-covered employees as well as non-agreement covered [management] employees.” Our report discussed the importance of a comprehensive total compensation strategy in attracting, motivating, and retaining highly qualified employees who are engaged and committed to the company’s success. A total compensation strategy goes beyond pay alone to address benefits and work-life flexibilities that are becoming increasingly important to workers.

The actions described in the action plan are focused almost exclusively on monetary compensation for non-agreement employees. This addresses only part of a total compensation strategy and focuses on only 15 percent of Amtrak’s workforce. While actions to address non-agreement monetary compensation are commendable, this is but one piece of what is needed, and should not be finalized without taking into consideration the other elements of compensation and showing how the total compensation strategy supports an overall human capital strategy.

Without a clear total compensation strategy that ties together all of the different elements of compensation, Amtrak risks spending money in ways that are less than optimally effective in attracting, motivating, and retaining the employees needed to accomplish the company’s business and strategic objectives.

Organizational Structure. Recommendation 6A from the human capital management report states that Amtrak should “combine the HR and LR departments to form one HC [human capital] department. As part of this reorganization, combine and/or realign the

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divisions and branches within the new department to improve communication, accountability, collaboration, clarify job responsibilities, and provide a structure to support HCM [human capital management].” Our report discussed several examples of how a change in organizational structure could help improve communication, accountability, and collaboration, and clarify responsibilities between the HR and LR departments and within the HR department.

While Amtrak has combined the two departments into one on its organization chart (and listed this recommendation as “complete” on the latest action plan), in truth, beyond combining the departments under one executive, little has been done to merge the activities of the two departments. The as-yet unmet intent of our recommendation was to improve communication and interaction within the old HR department and between the old HR and old LR departments. Much more could still be done in the newly-joined department.

Company-wide Job Families. Recommendation 2D1 from the training and employee development report states that the VP for HR&DI, in consultation with Amtrak’s executive leadership, should “develop broad, company-wide job families and career progression paths for all non-agreement positions.” Career progression paths both identify the expected path for management progression and assure individual managers that they are making proper career choices to increase their likelihood of advancing within the organization. Job families are broader fields of positions linked by similar endeavors or technical skills. Ideally, positions requiring similar attributes, skills, or expertise should be managed as a “family,” with someone designated to ensure that those in the family get the appropriate training and the required experiences that will allow them to grow and succeed.

The most recent action plan (April 29, 2011) stated, under *Actions Year to Date*, “Collaborated with IT and Engineering to develop career families. Ongoing collaboration with other organizational groups. . . . A career path planning/implementation approach will be presented to the Executive Committee in February 2011.”

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At a follow-up meeting with the responsible high-level Amtrak manager on February 23, 2011, a discussion of job families determined that the current approach was to develop individual families within each Amtrak department, rather than “company-wide.” When queried as to how this would meet the criteria of “broad company-wide job families” contained in the recommendation, the reply was that it would not; the Amtrak manager did not see how one could possibly establish company-wide job families, despite the example discussed in the original report at another large railroad.

The current plan, despite the professed agreement with our recommendation, will not achieve the purpose of the recommendation. As a consequence, if Amtrak continues along the path it is pursuing, it will not be able to ensure that it is “growing” individuals with the proper skills and experience to be the future leaders of the company. At best, the company will nurture future department leaders who have experiences in only one department. This will further exacerbate Amtrak’s silo mentality⁶—which is what the recommendation was intended to address.

Educational Standards for Non-agreement Employees. Recommendation 2E2 from the training and employee development report states that the VP for HR&DI should “ensure all new non-agreement hires or promotions possess the minimum educational standard identified in the position description or that a waiver has been granted by the president of Amtrak or his designated representative.” The purpose of this recommendation was to increase the educational levels of managers to be on par with those found in benchmarked organizations. The original report found that of the top 12 senior leaders in two of Amtrak’s operating departments, only one had a college degree. At a benchmarked freight railroad, 8 of the 11 comparable senior leaders had college degrees.

The action plan update of April 29, 2011, states: “This recommendation continues to be an integral component of Amtrak’s standard operating practice as it relates to recruitment and placement.” Yet Amtrak still posts jobs that contain educational requirements and then adds the Amtrak standard suffix “or the equivalent combination

⁶ A silo mentality is demonstrated by a lack of communication or awareness among departments in an organization. The opposite of systems thinking, the name derives from the farm storage silo, in which each silo is designated for a specific grain.

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of education, training, and/or experience,” which essentially renders the educational requirement moot. This wording was even included with the recent postings for both the Vice President for Operations position and the Chief Human Capital Officer position.

Consequently, as long as hiring managers can judge experience as equivalent to a degree, anyone can meet the minimum educational requirements, and there is no need to have a process to request a waiver from the company president. This was clearly not the intent of the recommendation. As we commented in our previous report (E-09-06, October 26, 2009),

A college education is not the only tool in an individual manager’s toolkit; there are some people whose natural leadership abilities substantially offset their lack of a baccalaureate education, and many of them are in senior leadership positions at Amtrak. On an individual basis, this is good, and arguably there should always be positions for a very small percentage of individuals who are truly gifted in these areas. However, on an aggregate basis, a senior leadership lacking formal technical and/or business education is not an ideal situation for the successful operation of a complex, 21st-century transportation company.

Training Records. Recommendation 1F2 from the training and employee development report states that the VP for HR&DI should “develop policies and procedures to ensure that all training is being appropriately captured in HRIS (Human Resource Information System) and that duplicate records are not continuing to be maintained.” This recommendation was intended to address the observation that multiple records and databases were being maintained in the field to track training. Although corporate policy mandated that all training be documented in HRIS, according to managers in the field, the corporate system was not responsive to their needs and they therefore wanted to keep their own records. We saw this as inefficient and said that, once the new Employee Information Management System was fully implemented, there should no longer be the need for records to be maintained by field managers.

Again, the latest action plan lists this recommendation as “complete.” When we asked for copies of the policies and procedures that had been developed to ensure that duplicate records were not continuing to be maintained in the field, we were given the

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policy that was in effect at the time we conducted our evaluation. Therefore, no new policies or procedures had been developed to address our recommendation. Without new corporate direction and action, managers will continue to keep duplicate records in the field, which is not only inefficient but can compromise the accuracy and completeness of the corporate database.

Some Progress Reported in the Action Plan was Misleading or Embellished

Some of the actions identified in the action plan to demonstrate progress were found to be misleading or embellished. For example:

Management Assessment Tool. Recommendation 2B from the training and employee development report stated that the VP for HR&DI should “develop and implement an appropriate management assessment tool for all applicants for non-agreement positions.” This recommendation was based on current practices at benchmarked railroads and was designed to ensure that those selected to fill Amtrak management positions would possess the characteristics that would make them likely to succeed.

The most recent action plan stated, under *Actions Year to Date*, “currently assessing available instruments that are consistent with the competencies defined. Finalizing the report with applicable recommendations.” However, at a follow-up meeting on March 22, 2011, OIG staff interviewed the Amtrak manager listed as the Responsible Party and requested information about the assessment and a copy of the draft report. In response, we were told that the “team” that did the assessment consisted of the Responsible Party alone and that the report and recommendations were provided verbally to the VP for HR, LA & DI. Further, no written record existed of the assessment results or the recommendations.

Cross-Departmental & Corporate Competencies. Recommendation 2F1 from the training and employee development report stated that the VP for HR&DI should “develop and implement a plan to expand cross-departmental experience within the middle and senior management of the company.” A company-wide survey of Amtrak

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employees - conducted by Accenture⁷—found that Amtrak still has a silo mentality that pervades all departments and constitutes a significant barrier to improvement. Development of cross-functional experience is an important step in breaking down such barriers.

The most recent action plan stated that “Management will establish a cross functional team to explore the feasibility of establishing a cross functional program.” However, during a follow-up interview on March 22, the Responsible Party advised that the “cross-functional team” currently consisted of one person—the Responsible Party. Linked to that same finding was recommendation 2F2, which stated that the VP for HR&DI should “track and report progress towards achieving this cross-departmental experience on a semiannual basis, at a minimum.”

The most recent action plan shows that “Development of a program pilot is underway.” However, when we requested documentation of the pilot program, we were told that “written documentation is not ready for review.”

New Employee Orientation. Recommendation 1A2 from the training and employee development report stated that the VP for HR&DI should “track and report on a quarterly basis the number of new hires that have not attended the New Employee Orientation (NEO) workshop, or equivalent, within 30 days of hire.”

The initial and subsequent Amtrak responses—including the most recent action plan — indicated that “Management will generate monthly SAP⁸ reports that define all new hires for the quarter who have not attended NEO workshop. . . . The first reports will be forwarded to department heads . . . on July 1, 2010.” The most recent action plan lists this recommendation as “completed.”

OIG staff requested copies of any previously-generated monthly or quarterly reports of new hires who have not attended NEO workshops. The only “report” provided was an SAP-generated listing of all new hires from October 2010 through December 2010, with

⁷ *Strategic Asset Management Culture Value Analysis*, Executive Summary, Accenture, February 2009.

⁸ SAP (which stands for “Systems, Applications, and Products in Data Processing”) is a business management software program in use at Amtrak.

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their NEO attendance dates included. This listing had not been analyzed to determine the number of new hires who had not attended the workshop within 30 days of hire.

When this list was analyzed by OIG staff it appeared that of 327 new hires, 110 had never attended the NEO workshop and another 25 had not completed it within the prescribed first 30 days. The fact that 41 percent of the new hires had not complied with the basic recommendation and that anyone receiving this “report” would have to do his or her own analysis of the data to understand that fact, makes the “completed” status that was reported for this recommendation questionable at best.

Instructor Qualifications. Recommendation 1G1 from the training and employee development report stated that the VP for HR&DI should “develop a policy that establishes minimum qualifications and certifications required to be an instructor for each course taught at Amtrak.” The most recent action plan states that this action is “complete.” However, when we asked for a copy of the policy, we learned that one does not exist.

Linked to the same finding, recommendation 1G2 states that the VP for HR&DI should “develop a program to insure all Amtrak instructors achieve and remain in compliance with the above policy.” The most recent action plan states that “Instructor qualifications are included in the revised job descriptions for Employee Development instructors” and shows the status of implementing the recommendation as “complete,” yet if the policy does not exist, how can the program to insure instructors remain in compliance with the policy be considered “complete”?

Amtrak Acknowledges that Implementing the Recommendations Has Not Been a Priority

Given that it has been 19–24 months since we issued these two reports and their 51 recommendations, we strove to find out why so little has been done in implementing the recommendations. At the end of our interview with the former Vice President for HR, LA & DI, she candidly volunteered that this had not been “a priority” for Amtrak. The lack of sustained, focused attention and the limited resources applied to implementing the recommendations would seem to substantiate this.

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CONCLUSIONS

Two years ago, in our human capital management report, we stated:

Once the economy turns around, there is a real danger that Amtrak will lose skilled craftsmen and technical experts faster than it can replace them. In fact, over a quarter of Amtrak's workforce will be eligible for retirement within the next 5 years. Investments in recruiting, developing, motivating, and retaining highly qualified employees with the skills that are critical to Amtrak's current and future needs are required for Amtrak to maintain its position as the acknowledged leader in intercity passenger rail in the U.S.

To guide Amtrak management in where to focus its efforts and resources, we made a total of 51 recommendations in our two reports. As we have shown, only limited progress has been made toward implementing these recommendations. Unless addressing these critical shortcomings becomes a priority, Amtrak will continue to suffer from outdated human capital management, training, and employee development practices that hinder its ability to perform effectively. In addition, Amtrak is increasingly at risk of encountering skills shortages that will degrade and potentially keep Amtrak from fully accomplishing its core mission of providing intercity passenger rail service for the nation.

RECOMMENDATIONS

In order to ensure greater progress in implementing important human capital management recommendations that were made 19–24 months ago, we recommend that the Amtrak President and CEO

1. make improved human capital management, training, and employee development a clearly articulated priority for the soon-to-be-hired Chief Human Capital Officer, as well as for all executives and managers at Amtrak; and

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2. direct the Chief Human Capital Officer to revise the Human Capital Action Plan to include actions that are responsive to the recommendations and with reasonable implementation time frames.

MANAGEMENT COMMENTS AND OIG ANALYSIS

Amtrak's President and CEO met with the Inspector General on June 14, 2011, at which time he agreed to our recommendations and laid out a plan under which the soon-to-be-hired Chief Human Capital Officer would address the findings and recommendations contained in this report. Amtrak's written response to our draft report (see Appendix I) elaborates on this plan as follows:

Amtrak is aggressively seeking to fill the vacant Chief Human Capital Officer (CHCO) position. In fact, we are planning to have the selection presented to the Amtrak Board on July 21. Anticipating their approval, the incumbent should report by mid-August. One of the first deliverables that I will require of the new CHCO is to analyze the OIG Report . . . and develop an action plan for addressing the findings. I will provide to the OIG the action plan, with specific milestones, within 60 days of the CHCO reporting on board.

We support this approach.

We appreciate the courtesies and cooperation of Amtrak representatives during the preparation of this report. If you or your staff have any questions, please contact Calvin Evans, Assistant Inspector General, Inspections and Evaluations, at 202.906.4507 (Calvin.Evans@amtrakoig.gov).

cc: Members, Amtrak Executive Committee
Peggy Reid, Chief Corporate Liaison
Jessica Scritchfield, Senior Director, Internal Controls/Audit

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Appendix I
COMMENTS FROM AMTRAK'S PRESIDENT AND CEO

NATIONAL RAILROAD PASSENGER CORPORATION
 30th Street Station, 5th Floor Southeast, Philadelphia, PA 19104

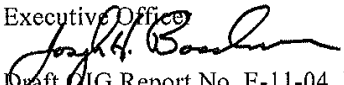
Memo



Date June 30, 2011

From Joseph H. Boardman, President and Chief
 Executive Officer

To Ted Alves, Inspector General

Subject 
 Draft OIG Report No. E-11-04, Human
 Capital Management

cc Michael Duncan, Acting Vice President
 William Herrmann, Managing Deputy
 General Counsel
 Jessica Scritchfield, Sr. Director, Internal
 Controls / Audit

This letter is in response to Office of Inspector General (“OIG”) evaluation draft report number E-11-04 “Human Capital Management: Lack of Priority Has Slowed OIG-Recommended Actions to Improve Human Capital and Training and Employee Development Practices,” dated June 2, 2011.

As you and I discussed in a meeting on June 14, 2011, Amtrak is aggressively seeking to fill the vacant Chief Human Capital Officer (CHCO) position. In fact, we are planning to have the selection presented to the Amtrak Board on July 21. Anticipating their approval, the incumbent should report by mid-August. One of the first deliverables that I will require of the new CHCO is to analyze the OIG Report referenced above and develop an action plan for addressing the findings. I will provide to the OIG the action plan, with specific milestones, within 60 days of the CHCO reporting onboard.

Thank you for your understanding as we fill this critical position and address the many human capital challenges facing Amtrak.

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CATEGORY	RECOMMENDATION	ACTION PLAN	RESPONSIBLE PARTY	DATE TO BE ACCOMPLISHED	ACTIONS YEAR TO DATE	OIG STATUS	OIG COMMENTS
SUCCESSION PLANNING							
Succession Planning	1A. Amtrak involve top management, employees and stakeholders in developing, communicating and implementing a strategic workforce plan to enable Amtrak to identify, develop and sustain the workforce skills needed to successfully accomplish Amtrak's business strategy while balancing career and lifestyle goals of its employees.	<ul style="list-style-type: none"> Develop workforce demographic summaries for each key department. Conduct succession planning sessions with key executives within each organizational group to define required workforce skills and provide demographic summaries. Collaborate with key executives to define department function and work priorities, position descriptions, review position competencies to determine workforce gaps and skill set deficiencies. Develop and implement an assessment tool designed to conduct skill inventory of D and E band positions, and define corresponding skill gaps. Develop and implement a process to integrate training, education and career development into our business practice to enhance workforce skills and close competency gaps. Design and issue customized departmental reports that summarize workforce analysis, key talent profiles, potential skill gaps, and recommended actions. Create a competency database within SAP to capture and monitor skills needed. This action is contingent upon implementation of Phase IV EIM. 	Sheila Davidson	3/1/2011	<ul style="list-style-type: none"> Met with key executives from each department to review succession planning process and workforce demographic data. Developed and implemented a database to capture key talent profiles and competency requirements. Collaborated with key executives to document skill inventory of current D2/E Band employees. Defined competencies for D2 and E band positions and developed position descriptions. With the implementation of Employee Information Management (EIM) Phase III and the start-up of the HR Service Delivery, resources are in place to address workforce planning strategies and begin implementation of EIM Phase IV (contingent upon available funding) Produced monthly headcount reports to provide workforce trends and forecasts. Developed five year age-eligible retirement projections by organizational units for agreement and non-agreement positions to forecast needs. Performed data analysis to assess staffing vulnerabilities and hiring projections. 	Little Progress	Although some analysis and succession planning for senior non-agreement employees has been accomplished, there has been little progress in addressing the intent of this recommendation, which was to engage top management, employees and stakeholders in developing, communicating and implementing a corporate-wide strategic workforce plan. Efforts to date have been focused at the department level.
Skills and Competency Inventory	1B. Amtrak start a corporate-wide effort to identify (a) the current and future missions of the company, (b) the critical skills and competencies needed to support these missions, and (c) the gaps at Amtrak in the critical skills and competencies that need to be addressed to achieve current and future programmatic goals.	<ul style="list-style-type: none"> Obtain definition of the corporate vision from the executive leadership group. Based on the articulated vision and corresponding goals, work with the executive leadership to define competencies required to support the vision and goals. Simultaneously, continue identification of skill and competencies required to support current strategic imperatives of: Safer, Greener, Healthier; Improved Financial Performance; Improved Customer Service; and, Meet national needs. See 1A. Expand internal leadership training program to incorporate developmental strategies to emphasize identified competencies. Collaborate with departments to develop a job rotation system to cross-train employees, thereby creating a structure for staff to gain the competencies for redeployment in response to workload fluctuation and career advancement in support of succession planning. 	Lorraine Green	TBD*	<ul style="list-style-type: none"> *The Amtrak President and CEO has created an executive leadership team to focus on defining the organizational vision for the company. Meetings are conducted every other Tuesday with the goal of defining elements of a high performing organization (HPO) and the corresponding mission and organizational support requirements. Additionally, leadership training has been conducted in support of this effort to assist in defining HPO requirements. Collaborated with department senior staff to develop position descriptions including competencies for positions D2 and above. Developed and implemented a talent inventory process to capture key competencies by organization groups to assist in identifying successors. Began business process design of the SAP Qualifications catalog that will detail required job competencies. Began development of individual department reports which summarize succession planning feedback provided during one on one reviews. 	Little Progress	The effort to date has focused on position descriptions and succession planning for the senior leadership (top 2%) of the organization. Beyond that, little has been done to identify the critical skills and competencies needed to support the current and future missions of the company and skills and competencies that need to be addressed for Amtrak to achieve its current and future strategic goals.
Workforce Gaps	1C. Amtrak develop the workforce planning strategies to address its workforce gaps.	<ul style="list-style-type: none"> See 1A and 1B. To close competency gaps, engage senior leadership to champion high professional standards (education, qualifications, performance) in hiring and promotions. 	Sheila Davidson; Michael Ramirez Stephanie Pavlakis	6/1/2011	<ul style="list-style-type: none"> Worked with individual department heads to perform key talent inventories and began development of the data base to capture and maintain applicable data. 	No Progress	Until the gaps in critical skills and competencies are identified, strategies to address the gaps cannot be developed.
Workforce Strategies	1D. Amtrak build the capability needed to support its workforce strategies.	<ul style="list-style-type: none"> See 1B, 1C. Collaborate with EIM and SAM project teams to define key performance indicators and talent management reports to track workforce performance. 	Sheila Davidson; Stephanie Pavlakis Paula Porter	12/30/2011	See 1A, 1B, 1C.	No Progress	Until the workforce strategies are developed, the capabilities to support the strategies cannot be built.
HC Goals	1E. Amtrak establish a process to monitor and evaluate its progress towards achieving its HC goals and achieving its programmatic results.	<ul style="list-style-type: none"> See 1A, 1B, 1C, 1D. Define and validate KPI's (Key Performance Indicators). KPI reports will include assessment of attrition rates; vacancy rates; performance management program measurements; compensation trends; promotion rates; transfer rates; and rate of participation in training programs. 	Sheila Davidson; Paula Porter	12/30/2011	<ul style="list-style-type: none"> Currently working with SAM project team to define KPI's and identify potential reports from the SAP system. 	Little Progress	Although some metrics have been identified, HC goals and a process to monitor and evaluate progress to achieving the goals have not been developed.

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COMPENSATION							
Compensation	2A. Amtrak implement a written, board of Directors' approved, comprehensive total compensation philosophy and strategy that addresses base pay, premium pay, variable pay, benefits and work-life flexibilities. This philosophy and strategy must be linked to the company's strategic HC plan and address agreement covered employees as well as non-agreement covered.	<ul style="list-style-type: none"> Conduct comprehensive internal and market compensation analysis. (95% complete) Develop compensation strategy recommendation based upon extensive analysis performed. (Will be completed in FY11). Present written findings and recommendations to the Amtrak Board of Directors. Obtain Amtrak Board Approval of comprehensive compensation strategy. 	L. Green	Revised Date 9/30/2012	<ul style="list-style-type: none"> Completed a comprehensive report detailing compensation strategies for non-agreement employees and presented the recommendations to the Amtrak Board of Directors on June 18, 2009. The report included funding estimates and three key strategies: market pay, variable pay, and geographic pay. March 2010 Amtrak Board of Directors approved the implementation of Geo Pay. Funding sources was established and Geo pay was implemented July 2010. Performed additional market and variable pay analysis and submitted resulting findings to the Amtrak Board for approval at the November 2010 board meeting. <p>The development of a total compensation strategy will have significant financial implications to the company. Thus this objective is to continue to work with the Amtrak Board of Directors to build a multi-year strategy detailing the major elements that will have to be implemented over a period of time, depending on funding availability.</p>	Some Progress	Considerable thought and effort has been expended developing a comprehensive monetary compensation strategy for non-agreement employees; however, the Board has not approved the strategy presented. In addition, the effort to date has not addressed agreement employees (85% of the company) nor non-monetary compensation. The intent of the recommendation was to address total compensation as a package.
Compensation	2B. As part of developing the total compensation philosophy and strategy, Amtrak conduct an assessment of the value that employees place on various elements of the three total compensation components. This assessment should include both current employees and potential future employees.	<ul style="list-style-type: none"> Conduct benefits benchmarking study. Develop formal report summarizing findings and detail recommended strategies. Present findings and recommendations to the Amtrak executive team for review and approval. 	M. Duncan	12/30/2011	<ul style="list-style-type: none"> Funding was not available in 2010 to conduct benefits benchmarking study. Another attempt will be made in FY2011. If funding is still not available, other options will be pursued. Presently engaged in an RFP to select a health and welfare benefits consultant. Will engage this consultant to assist in completing a benefits benchmarking study. 	No Progress	No work is currently underway on a benefits benchmarking study.
Compensation	2C. Amtrak implement a communication plan to support effective change management in implementing the company's total compensation philosophy and strategy.	<ul style="list-style-type: none"> Obtain Amtrak Board Approval. Collaborate with Corporate Communications to develop plan based upon Amtrak Board feedback. 	M. Duncan	120 Days Following Board Approval	See 2A and 2B	Little Progress	A communication plan is included as part of the scope of work for the consultant developing the market-based salary structure for non-agreement employees. This will be only part of the overall communication plan envisioned in the recommendation.
Compensation	2D. Amtrak include sufficient funding annually in the budget to accomplish the required investments necessary to support the total compensation philosophy and strategy. (Inserted by OIG. This recommendation was omitted in the Amtrak action plan.)					Little Progress	Funding has been approved to complete a market-based compensation study, but funding has not been approved yet to support implementation of the entire non-agreement monetary compensation strategy.
Compensation	2E. Amtrak develop a labor contract management strategy that supports the company's total compensation philosophy and strategy, and is aligned with the challenges of recruiting, motivating, developing and retaining agreement covered employees.	<ul style="list-style-type: none"> Establish a labor advisory group comprised of Amtrak senior executives. Define Amtrak labor strategy based on environmental factors. 	Designated Senior Executives	Completed	<ul style="list-style-type: none"> Amtrak President and CEO established Labor Advisory group comprised of key Amtrak executives effective 12/2009. Amtrak changed the Labor Relations leadership in 1/2010. July 2010 Amtrak CEO and Board of Directors established the Chief Labor Negotiator position. 	No Progress	A compensation strategy for agreement-covered employees has not been developed. Until a compensation strategy is developed, a contract negotiation strategy to support it cannot be developed.
Compensation	2F. Amtrak develop a comprehensive pay structure for non-agreement covered employees that supports the company's total compensation philosophy and strategy for non-agreement covered employees.	<ul style="list-style-type: none"> Conduct compensation benchmarking study. (Complete) Produce report summarizing study results and corresponding recommendations. (In process of completing) Present report to senior executive team for review and incorporate feedback. Obtain Board approval for final recommendations. 	M. Duncan	9/30/2011	<ul style="list-style-type: none"> Conducted benchmarking study of band/zone structure. Presented market based salary structure to the Amtrak Board of Directors. Recommendations are still under consideration. See 2A and 2C. Implementation will be contingent upon Board approval and available funding. <p>In process of completing extensive market pay analysis that will support the implementation of a market-based salary structure in 2011 for non-agreement employees. This will serve as a foundation for completing the compensation strategy.</p>	Some Progress	A market-based pay structure for non-agreement employees is being developed. Currently waiting for final report from consultant.

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Recruitment	3A. Amtrak look closely at its current recruitment process to eliminate redundancies and realize efficiencies, both in cost and time to hire.	<ul style="list-style-type: none"> Assess business process established through EIM. Establish protocols to identify additional efficiencies and continuous improvements. Implement identified strategies to eliminate redundancies. 	Paula Porter	04/30/11	<ul style="list-style-type: none"> Collaborated with the EIM3 project management team to define, blue print, design, configure/customize, user testing and training of EIM3 business processes used in the 05/19/10 implementation of automated systems (e-recruitment, e-learning, e-qualifications, business intelligence) that will increase efficiency. Currently reviewing implemented business processes, focusing on continuous improvement and correcting system defects. Identified program changes will occur following SAP/SAM implementation 	Little Progress	HR only recently formed a team to document and evaluate the recruitment processes.
Recruitment	3B. Amtrak create an overall HC recruitment strategy involving all stakeholders, which identifies Amtrak's critical positions and the techniques to be used to fill them as quickly as possible.	<ul style="list-style-type: none"> Conduct an analysis of internal workforce trends and environmental factors. Collaborate with key stakeholders and departments to establish strategic recruitment and retention plans. Establish annual process to review KPI's and make appropriate changes based upon environmental changes. Integrate succession planning process with defined recruitment and retention process. Create and implement recruitment strategy based upon defined factors. 	Paula Porter	06/30/11	<ul style="list-style-type: none"> Worked with key stakeholders in transportation organization units and implemented hiring (recruiting/staffing/training) plans designed to reduce time to hire. Worked with key stakeholders in Mechanical and Engineering organization units to develop hiring (recruiting, staffing, training) plans designed to reduce time to hire in support of American Recovery and Reinvestment Act initiative. Awaiting department approval on plan. As part of HR's new Service Delivery Module, established HR Consultant role which partners with HR's Centers of Excellence with a role to work with key stakeholders and departmental clients in establishing strategic recruitment and retention plans. Worked with key stakeholders in Office of the Inspector General, Policy and Development, Information Technology and Amtrak Police Department organization units and implemented hiring plans which reduced time to hire. 	Little Progress	Although effort has been expended to address departmental recruiting issues, there is no significant effort underway to develop an overall HC recruitment strategy.
Recruitment	3C. Amtrak continue to support the full implementation of the company's EIM Phase III and IV projects with regard to e-Recruitment.	Will continue to support the full implementation of the company's EIM Phase III and IV projects with regard to eRecruitment. Phase IV contingent upon available funding.	Green, Trainor	Phase III - Completed Phase IV - Contingent Upon Available Funding	<ul style="list-style-type: none"> Collaborated with the EIM3 project management team to define, blue print, design, configure/customize, and user testing and training of EIM3 business processes used in the 05/19/10 implementation of automated systems (e-recruitment, e-learning, e-qualifications, business intelligence) that will increase efficiency. 	Some Progress	EIM Phase III has been implemented. The scope of Phase IV with regard to eRecruitment is still to be determined based on the ongoing evaluation of the recruitment process. Depending on the definition of the scope of work, funding may be an issue.
Knowledge Transfer	4A. Amtrak develop a corporate retention strategy that aligns with and supports the overall HC strategic plan.	See 3B and 3C.	P. Porter	6/30/2011 Support of Plan Contingent Upon Available Funding	See 3B and 3C.	No Progress	There has been no coordinated effort to develop a corporate retention strategy.
Knowledge Transfer	4B. Amtrak develop a plan that addresses knowledge transference that must occur from the thousands of Amtrak employees that will retire over the next several years.	<ul style="list-style-type: none"> Create a mentoring program which engages experienced staff in knowledge transference. Expose staff to expanded professional experiences through position rotations and diversified assignments. Identify single incumbents and highly specialized positions to create candidate pools through advance recruitment and focused training. Create business practice documentation processes to ensure that information and knowledge are memorialized for the future. 	Sheila Davidson Elisha Lewis	12/1/2011	See 1A, 1B, 1C.	Little Progress	Although there may have been isolated efforts to pass knowledge between employees, there has been no comprehensive effort to develop a corporate-wide plan to address knowledge transfer from departing employees.
Knowledge Transfer	4C. Amtrak develop an updated estimate of the comprehensive cost of employee turnover for agreement covered and non-agreement covered positions to assist in the development of the company's retention strategy.	<ul style="list-style-type: none"> Conduct attrition analysis. Develop trend reports. Conduct cost analysis and produce resulting report. 	Sheila Davidson	Ongoing	<ul style="list-style-type: none"> Monthly attrition reports are generated and reviewed by the HR Workforce Planning team. Currently working with Finance to obtain guidance on building a data base to facilitate development of cost factors. 	Some Progress	An updated estimate of the cost of employee turnover for non-agreement covered employees has been developed. However, a corresponding estimate for agreement covered employees has not.

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EMPLOYEE ENGAGEMENT							
Employee Engagement	4D. Amtrak fully analyze the results from the recent employee surveys and develop comprehensive action plans to address the issues affecting employee satisfaction and morale.	<ul style="list-style-type: none"> Develop an Amtrak Interdepartmental Recognition Advisory Committee that will be responsible with developing a company-wide Employee Recognition Policy and Guidelines. Implement the initiative within all department's utilizing the assistance of dept recognition committees. Grow EAD events by incorporating the importance of Amtrak's history at all Amtrak locations. Utilize current SAP functionality to partner with SIKRoad OnBoarding software to strengthen and personalize employee experiences, resulting in a more motivated and engaged workforce contingent upon the availability of funding required to complete the task. Develop an action plan to address issues identified through the recognition programs, surveys, and onboarding strategies. 	Elisha Lewis	4/1/2011	<ul style="list-style-type: none"> Established a cross functional project team led by HR to include Marketing & Product Mgmt; Corporate Communications. This group worked to develop a action plan of Employee Engagement initiatives along with a corresponding employee communications strategy that was presented to the Executive Committee for approval to include: <ul style="list-style-type: none"> Employee Appreciation Day – Events held around the country that promote & honor the support each have provided to Amtrak over the years. The Employee Recognition program – to include a company policy and guidelines in an effort to build a culture of recognition by recognizing employees and promote recognition of employees for their achievements and contributions to Amtrak Wellness Program – Providing employees with programs that focus on their physical and mental well being On-Boarding Pilot – to increase in new employee satisfaction and day one readiness. Pilot was launched at Beech Grove facility. 	Some Progress	Significant effort has been expended in addressing employee recognition and engagement, but there is still no comprehensive action plan to address all of the issues surfaced in the referenced employee surveys.
	5A. Amtrak fully support and complete the implementation of EIM Phase II through IV projects.	Will continue to support the full implementation of the company's EIM Phase III and IV projects with regard to eRecruitment. Phase IV contingent upon available funding.		Phase III - Completed Phase IV - Contingent Upon Available Funding	Capital funding to continue Phase IV SAP implementation is currently not available.	Some Progress	EIM Phase II and III have been implemented. Phase IV does not have approved funding. HR has not yet developed a business case argument to support funding of the portions of Phase IV that are critical.
	5B. Amtrak take full opportunity during EIM implementation to reengineer current business processes to make them as efficient and effective as possible.	As detailed in 3A and 3B, has conducted extensive review of business processes and where applicable have reengineered processes to facilitate continuous improvement.	Paula Porter Mike Duncan	4/30/2011	<ul style="list-style-type: none"> Thorough review of business processes and best practices were integral components of the EIM process. Many processes were reengineered and efforts continue in the review and establishment of the HR service delivery model. 	Some Progress	Efforts to reengineer business processes continue as part of the development and implementation of the Service Delivery Model with assistance from Deloitte.
	6A. Amtrak combine the HR and LR departments to form one HC Department. As part of this reorganization, combine and/or realign the divisions and branches within the new department to improve communication, accountability, collaboration, clarify job responsibilities, and provide a structure to support HCM. A suggested new organizational structure is offered for consideration in Appendix D.	Combine departments.	J. Boardman	Complete	<ul style="list-style-type: none"> Worked with the President and CEO as well as the Board of Directors to establish AVP and Chief Negotiation office as well as a VP HR/Diversity initiatives and Labor Relations. Amtrak President and CEO established Labor Advisory group comprised of key Amtrak executives effective 12/2009. Amtrak changed the Labor Relations leadership in 1/2010. July 2010 Amtrak CEO and Board of Directors established the Chief Labor Negotiator position. 	Some Progress	Although Amtrak initially disagreed with this recommendation, the HR and LR departments have now been combined. However, our recommendation went beyond just having the two departments report to a single head. A realignment of the divisions and branches within the new department was also recom- mended. Some of this is currently being addressed as part of the service delivery model but is not complete.
	6B. Amtrak create a single chief Human Capital Officer (HCO) position to lead the new department and the company's strategic HC planning initiatives. This position should also serve as the company's lead negotiator and spokesperson with the labor unions.	See 6A.	J. Boardman	Complete	See 6A.	Some Progress	Although Amtrak initially disagreed with this recommendation, a Chief Human Capital Officer position has now been created. However, until the new position is filled, it is unknown how the CHCO will interact with the unions.
	6C. Amtrak, as part of the reorganization, conduct HR competency assessments to identify gaps and then recruit and/or train staff to fill those gaps.	Conduct assessment of HR staff and staffing levels.	L. Green P. Porter	3/30/2011	<ul style="list-style-type: none"> Working with Deloitte to develop and implement an HR service delivery model. The first phase of this process included the establishment of the Employee Service Center. The second phase focuses on the establishment of Centers of Excellence and HR Strategic Business Partners. Competencies have been established and position requirements defined. Assessments will begin 1/2011. 	Some Progress	Until Centers of Excellence have been established and any reengineering efforts are complete, competency assessments will continue to be necessary as part of the reorganizational efforts.
	6D. Amtrak, as part of the reorganization, conduct an analysis of staffing levels to include consideration such as HR servicing ratio, HR staff distribution by expertise and experience, HR staff pay structure (band/zone) placement, HR supervisory ratio, and ratio of personnel actions to personnel staff.	See 6C.	L. Green P. Porter	3/30/2011	See 6C.	Little Progress	Beyond efforts in creating the Employee Service Center, little has been done to analyze and optimize staffing levels.

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TRAINING & EMPLOYEE DEVELOPMENT							
New Hire Orientation	1A1. That the Vice President of HR&DI schedule all new employees for the New Employee Orientation Workshop, or equivalent, as soon as possible after their hiring date, preferably on the first day on the Amtrak payroll.	<ul style="list-style-type: none"> Beginning on July 1, 2010, NEO workshops will be held every 30 days in Washington, DC; Philadelphia, PA; Chicago, IL; in the New England region; and Los Angeles. Management will issue a policy directive requiring managers to schedule employees for orientation within the employee's first day of employment to four weeks from date of hire by October 1, 2010. Management has initiated an effort to develop and implement alternative delivery methods for NEO. Collaboration with Marketing to develop a top-quality video presentation which includes a CEO welcome and conveys the values of NRPC with a target date of January 30, 2011, contingent upon the availability of funding required to complete the task. Management will generate monthly SAP reports that define all new hires for the quarter who have not attended NEO workshop. In connection with the policy to be issued by July 1, 2010, the first reports will be forwarded to department heads with a published schedule of upcoming NEO workshops on July 1, 2010. Department heads will be responsible for scheduling respective employee training. 	Ramirez Ramirez E. Lewis	Completed Completed	<p>Completed. Course schedule (dates and locations) have been entered into SAP e-learning Course Catalog for 1st and 2nd quarter FY2011.</p> <p>Completed. Policy directive issued on October 7, 2010. Directive requires managers to schedule employees for orientation within the employee's first day of employment to four weeks from date of hire.</p> <p>Development of video presentation is temporarily on hold. Working with Corporate Communications in developing notice/advertisement for Amtrak. This Week and Amtrak Ink, advertising policy directive and NEO requirement</p>	Some Progress	A schedule for workshops is published on the Amtrak intranet and a policy was issued; however, actions do not appear to be accomplishing intent of recommendation. Analysis of Amtrak data for 327 new hires in first quarter of FY 11 found that 33.6% (110) had never received NEO and 7.6% (25) received it a after 30 days from hire date, a total of 41.2% not meeting the intent of the recommendation.
New Hire Orientation	1A2. That the Vice President of HR&DI track and report on a quarterly basis the number of new hires that have not attended the New Hire Orientation Workshop, or equivalent, within 30 days of hire.	<ul style="list-style-type: none"> Management will generate monthly SAP reports that define all new hires for the quarter who have not attended NEO workshop. In connection with the policy to be issued by July 1, 2010, the first reports will be forwarded to department heads with a published schedule of upcoming NEO workshops on July 1, 2010. Department heads will be responsible for scheduling respective employee training. 	Pavakis	Completed	Developed and implemented a monthly report of new employees by organizational group. Report is used to facilitate identification of employees who must attend orientation. The HR Operations group will coordinate with respective managers to ensure new employees attend NEO. HR Operations Training and Development Coordinator identified and trained on management and administrative responsibilities of NEO course schedule and roster. A copy of the monthly report was provided to the OIG.	Little Progress	The only "report" provided was an SAP-generated listing of all new hires from October 2010 through December 2010 with their NEO attendance dates included. This listing had not been analyzed to determine the number of new hires that had not attended the NEO workshop within 30 days of hire. The fact that 41% of the new hires had not complied with the basic recommendation and anyone receiving this "report" would have to do their own analysis of the data to understand that fact, makes this report only marginally useful and does not meet the intent of the recommendation.
New Hire Training (Job Specific)	1B. That the VP for HR&DI lead an effort to identify, with input from each Amtrak department, the initial job-specific training required for each position within Amtrak, and track whether new hire employees start this training within the first 30 days of employment.	<ul style="list-style-type: none"> All Amtrak jobs will have updated position descriptions by June 30, 2010. Establish qualification profiles for applicable positions within the SAP system. Generate periodic reports to verify employee successful participation in applicable programs as defined by qualification requirements. 	Duncan Porter	Complete 9/30/11 Contingent upon availability of capital funding for SAP enhancements	<ul style="list-style-type: none"> The position description project was completed on June 30, 2010 and all management jobs have position descriptions. A comprehensive effort is currently underway to establish/update position descriptions for all Amtrak jobs and build qualification profiles within the Amtrak SAP system. The referenced qualifications catalogue will include all educational and training requirements. This process will not only enhance recruitment efforts, but will also serve as the basis for performance management and employee development. Qualifications for positions that require FRADOT training and/or certification are being populated in Training Qualifications Catalog as of EIM3 go live 5/19/10. Completion of this task is contingent upon continued funding support for the SAP project. To date extensive efforts have been put forth to attach applicable regulatory requirements to respective jobs. 	Little Progress	Only limited progress has been made in populating the qualification profiles with all of the "initial job specific training" for all employees, both agreement and non-agreement, and there is no tracking effort underway to see if new employees start this training within 30 days of employment.
Subsequent Training	1C. That the VP for HR&DI, working with the department heads, develop specific guidance on who should attend each course offered and the frequency in which it is required to meet the intended objective of the training.	See 1B.	Porter	9/30/11 Contingent upon available funding for system enhancements	See 1B. Additionally, subsequent training will be contingent upon applicable regulation and outcomes of the HPO process. A course catalog detailing regulatory requirements is being finalized and includes information relevant to required frequency as well as applicable prerequisites.	Some Progress	Although the new draft course catalogue demonstrates progress toward implementing this recommendation, it is still not complete. The references to funding and the HPO process holding this back are misleading and should not delay implementing this recommendation.

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Training Strategy	ID1. That the Amtrak President issue a corporate-wide strategy for training and employee development providing guidance to the corporation on the linkages of training and employee development to the achievement of Amtrak's strategic goals and objectives.	In an effort assess strategic goals and objectives the VP for HR&DI will meet with Executive Committee Members to discuss: <ul style="list-style-type: none"> options for improving the efficiency of Amtrak's training minimum qualifications and certifications required to be an instructor the current Amtrak Management Associate Program succession planning an appropriate management assessment tool leadership training and career development for all employees performance management education standards A corporate-wide strategy for training and employee development will be presented to Amtrak's President with a goal to have the strategy issued companywide.	Green Boardman	Revised Date 06/30/2011 TBD	<ul style="list-style-type: none"> Due to the introduction of new FRA proposed regulation governing the development and delivery of regulatory and safety training. The target date for this action has been revised. The HR team is an integral member of the FRA Rail Safety Administration training standards committee, and is actively participating in the development and implementation of training standards that will govern training requirements. Monthly work sessions have been conducted with the FRA since June, 2010 to finalize training standards. 	No Progress	As of Feb 10, 2011, none of the meetings and discussions outlined above had taken place. This is the critical path affecting 37% of all recommendations. The FRA rulemaking cited as a reason for the delay is considered unjustified and in any event would not affect the overall strategy to such a degree that initial discussions could not be accomplished. Departure of the VP for HR(LA & DI) will further delay progress.
Training Strategy	ID2. That the VP for HR&DI, in consultation with Amtrak's executive leadership, develop consistent, corporate-wide policies and procedures to support the strategy.	<ul style="list-style-type: none"> The HR Department will revise and/or develop policies based on the defined strategic direction and establish, implement, and communicate the strategy to support compliance with policy provisions. A glossary of common training terms will be incorporated into the policy. Policies and procedures to ensure that all training is appropriately captured in SAP will be incorporated into the policy. 	Porter	06/30/11	See ID1. Target date will be impacted by actions detailed in ID1.	No Progress	No action taken. Linked to recommendation ID1.
Training Efficiency	IE. That the VP for HR&DI, in consultation with other departments, explore options for improving the efficiency of its training, including but not limited to increased centralization of some or all of Amtrak's instructor led training (particularly new hire training), and use of part-time contractor instructor employees to provide a surge capacity, if needed.	The Executive Committee will consider this recommendation in connection with recommendation ID1.	Porter	06/30/11	See ID1.	No Progress	As of Feb 10, 2011, no action has been taken. Departure of the VP for HR, LA, & DI will further delay progress.
Training Records	IF1. That the VP for HR&DI continue to fully support the implementation of EIM so that supervisors have the ability to easily view and manage their employee training records.	<ul style="list-style-type: none"> The EIM initiative is scheduled to be completed by May 31, 2010. Additionally, numerous training workshops are taking place in April and May 2010 to train supervisors. 	Green, Trainor	Complete	The EIM initiative (Phase III) was completed in May 2010.	Complete	The ability to manage employee training appears to be up and running, dependent upon a supervisor's desire and ability to use it.
Training Records	IF2. That, once EIM is sufficiently implemented, the VP for HR&DI develop policies and procedures to ensure that all training is being appropriately captured in HRS, and that duplicate records are not continuing to be maintained.	See ID2.	Porter	Complete	The HR Employee Development team consulted with all key stakeholders and provided guidance on requirements to capture training events in the SAP system.	Little Progress	No new policies or procedures have been developed to ensure that all training is being captured and duplicate records were not continuing to be maintained in the field.
Instructor Certifications	IG1. That the VP for HR&DI develop a policy that establishes the minimum qualifications and certifications required to be an instructor for each course taught at Amtrak.	<ul style="list-style-type: none"> Revise position description. 	Porter	Complete	Employee Development position descriptions are on file and include details on required instructor qualifications. Other requirements will be driven by impending FRA regulations.	No Progress	A policy has not been developed and PDs are not specific enough to address this recommendation.
Instructor Certifications	IG2. That the VP for HR&DI develop a program to insure that all Amtrak instructors achieve and remain in compliance with the above policy.	<ul style="list-style-type: none"> The Executive Committee will consider this recommendation in connection with recommendation ID1. 	Porter	Complete	<ul style="list-style-type: none"> Instructor qualifications are included in the revised job descriptions for Employee Development instructors. Other requirements will be driven by impending FRA regulations. Position requirements are attached in the job profile maintained in SAP. The Sr. Director Employee Development will provide an overview of job profiles and related SAP process for the OIG Evaluation team. 	Little Progress	In absence of a policy responding to IG1, a program to insure compliance cannot be developed.
Computer Based Training Validation	IH. That the VP for HR&DI, working with the Chief Information Officer, develop procedures to ensure that individuals that are credited for taking required computer based training programs are the same individuals that completed the courses.	<ul style="list-style-type: none"> Management is currently exploring options to strengthen controls over computer based training. Management anticipates that a detailed action plan with milestone dates to implement the identified recommendations will be completed by August 30, 2010. Define what options are available to track and enhance security measures for computer based training validation. 	Pavlakis	Complete	A digital sign on process w/e-signature has been implemented in collaboration with the IT group to support computer based training.	Some Progress	Controls have been developed but can still be circumvented. No current efforts to further strengthen controls
Terminology	II. That the VP for HR&DI develop and publish a glossary of common training terms and definitions to facilitate communication and common understanding throughout the corporation concerning training and employee development topics.		Pavlakis	Complete	Completed. A glossary of training terms are included on the Amtrak Intranet under Employee Development.	Complete	This recommendation was fully complied with.

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CATEGORY	RECOMMENDATION	ACTION PLAN	RESPONSIBLE PARTY	DATE TO BE ACCOMPLISHED	ACTIONS YEAR TO DATE	OIG STATUS	OIG COMMENTS
Management Employee Career Development Strategy	2A1. That the Amtrak President, with the support and approval of the Board of Directors, issue a corporate-wide strategy for developing management employees to assume the future leadership roles within the company.	<ul style="list-style-type: none"> The Executive Committee will consider this recommendation in connection with recommendation ID1. 	Green	Ongoing	<ul style="list-style-type: none"> Position descriptions have been established and enhancements are being made to the Performance management process. Extensive analysis is currently underway to define the correlations and organizational needs. Research is also being conducted to identify legal requirements and address concerns. Additionally participating in HPO efforts to ensure applicable correlation. 	Some Progress	No corporate strategy currently being drafted, but some analysis has been done.
Management Employee Career Development Strategy	2A2. That the VP for HR&D, in consultation with Amtrak's executive leadership, develop consistent, corporate-wide policies and procedures to support the management career development strategy.	<ul style="list-style-type: none"> The Executive Committee will consider this recommendation in connection with recommendation ID1. 	Green	Ongoing	See 2A1.	No Progress	Until strategy is developed this cannot be started.
Management Candidate Aptitude Screening	2B. That the VP for HR&D develop and implement an appropriate management assessment tool for all applicants for non-agreement employee positions.	<ul style="list-style-type: none"> Assess legal implications and explore available options. Implementation is contingent upon available funding. 	Porter	01/30/11	<ul style="list-style-type: none"> Currently assessing available instruments that are consistent with competencies defined. Finalizing the report with applicable recommendations. 	Little Progress	Some research has been done, but no record exists of a report or any recommendations.
Management Associate / Trainee Program	2C1. That the VP for HR&D review and revise the current Amtrak Management Associate Program to fill an appropriate and effective role within the new management career development strategy.	<ul style="list-style-type: none"> Conduct assessment of current program. Perform benchmarking analysis. Define program improvements. 	Elisha Lewis	Revised Date 3/30/2011	<ul style="list-style-type: none"> Reviewing program curriculum and job rotation process. Solicited feedback from key stakeholders including current MAPs. Defined development structure that will be used base on feedback provided. 	Little Progress	Responsible party on MLOA since last fall. No evidence of an assessment or benchmarking results.
Management Associate / Trainee Program	2C2. That the CFO identify funding within Amtrak's corporate budget to meet the needs of the revised Management Associate Program.	<ul style="list-style-type: none"> Once a strategy has been developed and approved, an assessment of funding needed to implement such strategy will be completed. Management anticipates a corporate-wide strategy will be issued and communicated by January 2011. Funding assessment will begin in 2011. 	Green	2011	TBD	No Progress	No action can be taken until the revisions to Management Associate Program identified.
Career Progression & Job Families	2D1. That the VP for HR&D, in consultation with Amtrak's executive leadership, develop broad company-wide job families and career progression paths for all non-agreement positions.	<ul style="list-style-type: none"> The HR Department in conjunction with other Amtrak departments will explore the viability of this approach for Amtrak and make recommendations to the Executive Committee by September 1, 2010. 	Duncan	11/30/2010 (multi-year strategy)	<ul style="list-style-type: none"> Collaborated with the IT and Engineering groups to develop career families. Ongoing collaboration with other organizational groups. Implemented career path pilot plan for IT in Sept. 2010. In process of implementing career path plan for Engineering. A career path planning/implementation approach will be presented to the Executive Committee in February 2011. The rate of implementation will depend on funding and resource availability. 	Little Progress	Engineering and IT efforts were in progress before T&ED evaluation completed in October 2009. Current direction does NOT provide for company-wide families as stated in basic recommendation and will exacerbate "silo" problem.
Career Progression & Job Families	2D2. That Amtrak's President designate either the VP for HR&D or other Amtrak senior leaders to oversee and manage these families and career paths.	<ul style="list-style-type: none"> The Executive Committee will consider this recommendation in connection with recommendation ID1. 	Green	TBD*		No Progress	No action to date. Departure of the VP for HR, LA & D will further delay progress.
Educational Standards for Non-Agreement Employees	2E1. That the VP for HR&D, in conjunction with the heads of each department, ensure that appropriate educational standards are identified for all non-agreement employees.	<ul style="list-style-type: none"> The Executive Committee will consider this recommendation in connection with recommendation ID1. 	Green	TBD*		No Progress	No action to date. Departure of the VP for HR, LA & D will further delay progress.
Educational Standards for Non-Agreement Employees	2E2. That the VP for HR&D ensure that all new non-agreement hires or promotions possess the minimum educational standard identified in the position description or that a waiver has been granted by the President of Amtrak, or his designated representative.	<ul style="list-style-type: none"> This recommendation continues to be an integral component of Amtrak's standard operating practice as it relates to recruitment and placement. 	Porter, Duncan	Ongoing	<ul style="list-style-type: none"> Continue standard operating practice. Continue to collaborate with executives and hiring managers in defining educational requirements related to positions. As positions are posted and filled educational requirements are detailed. 	Little Progress	Amtrak still posts jobs that contain educational requirements and then adds the Amtrak standard suffix "or the equivalent combination of education, training, and/or experience," which essentially renders the educational requirement moot. Consequently, as long as hiring managers can judge experience as equivalent to a degree, anyone can meet the minimum educational requirements, and there is no need to have a process to request a waiver from the president of Amtrak. This was clearly not the intent of the recommendation.
Educational Standards for Non-Agreement Employees	2E3. That the VP for HR&D track and semiannually report progress toward achieving the educational standards identified in the position descriptions.	<ul style="list-style-type: none"> See 2E2. 	Porter, Duncan	Ongoing	<ul style="list-style-type: none"> Revised position descriptions have been developed for all non-agreement positions. Current efforts also include building Qualifications Catalogue within SAP. Continued efforts will depend on available funding. 	No Progress	Actions to date do not address the recommendation. AWP, HR confirmed no tracking and reporting accomplished or planned.
Cross-Departmental & Corporate Competencies	2F1. That the VP for HR&D develop and implement a plan to expand cross-departmental experience within the middle and senior management of the company.	<ul style="list-style-type: none"> Management will establish a cross-functional team to explore feasibility of establishing a cross functional program. Based on the outcome of this workgroup, a detailed action plan with milestone dates will be completed and submitted for executive group approval. 	Porter	12/30/11	<ul style="list-style-type: none"> Action will be contingent upon executive committee approvals detailed in ID1. 	No Progress	CFI was never established, action waiting on "executive approvals detailed in ID1".

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CATEGORY	RECOMMENDATION	ACTION PLAN	RESPONSIBLE PARTY	DATE TO BE ACCOMPLISHED	ACTIONS YEAR TO DATE	OIG STATUS	OIG COMMENTS
Cross-Departmental & Corporate Competencies	ZF2. That the VP for HR&DI track and report progress towards achieving this cross-departmental experience on a semi-annual basis, as a minimum.	See ZF1.	Porter	12/30/11	<ul style="list-style-type: none"> Development of program pilot is underway. 	No Progress	Linked to ZF1, which is linked to 1.D1. AVP, HR confirmed no tracking and reporting accomplished.
Cross-Departmental & Corporate Competencies	ZF3. That, in conjunction with the above, the VP for HR&DI develop and implement procedures to preclude advancement into upper middle management without career broadening, cross-departmental assignments.	See ZF1.	Porter	12/31/11	<ul style="list-style-type: none"> The President and CEO convened an HPO (high performing organization) group comprised of key leadership to review and take action on new initiatives. 	No Progress	Linked to ZF1, which is linked to 1.D1. AVP, HR confirmed that HPO group has not reviewed any initiatives related to this.
Leadership / Management Development	Z6. That the VP for HR&DI, in consultation with Amtrak's executive leadership, develop and implement a policy containing corporate-wide direction and guidance on leadership training and development for non-agreement employees.	<ul style="list-style-type: none"> The Executive Committee will consider this recommendation in connection with recommendation 1.D1. 	Green	12/31/11	<ul style="list-style-type: none"> Amtrak Leadership Institute has been established. Enhancements to the leadership program and corresponding enhancements to policy and procedure will be made based upon the feedback from the HPO senior leadership team. 	Little Progress	Linked to 1.D1 and development of corporate-wide strategy. Departure of the VP for HR, LA, & DI will further delay progress.

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Appendix III
ABBREVIATIONS

CEO	chief executive officer
DI	diversity initiatives
EIM	Employee Information Management
FRA	Federal Railroad Administration
GAO	Government Accountability Office
HC	human capital
HCAP	Human Capital Action Plan
HCM	human capital management
HPO	high performance organization
HR	human resources
HRIS	Human Resource Information System
IT	information technology
LA	labor administration
LR	labor relations
NEO	new employee orientation
OIG	Office of Inspector General
SAP	Systems, Applications, and Products
VP	vice president

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Appendix IV

OIG TEAM MEMBERS

Calvin Evans	Assistant Inspector General for Inspections and Evaluations
Mark Meana	Chief, Inspections and Evaluations
Ed Vogel, Jr.	Chief, Inspections and Evaluations
John (Skip) MacMichael	Director, Inspections and Evaluations
Catherine Smith	Chief, Human Capital Management

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OIG MISSION AND CONTACT INFORMATION

Amtrak OIG's Mission	<p>Amtrak OIG's mission is to</p> <ul style="list-style-type: none"> ▪ conduct and supervise independent and objective audits, inspections, evaluations, and investigations relating to Amtrak programs and operations; ▪ promote economy, effectiveness, and efficiency within Amtrak; ▪ prevent and detect fraud, waste, and abuse in Amtrak's programs and operations; ▪ review security and safety policies and programs; and ▪ review and make recommendations regarding existing and proposed legislation and regulations relating to Amtrak's programs and operations.
Obtaining Copies of OIG Reports and Testimony	<p>Available at our website: www.amtrakoig.gov.</p>
To Report Fraud, Waste, and Abuse	<p>Report suspicious or illegal activities to the OIG Hotline (you can remain anonymous):</p> <p>Web: www.amtrakoig.gov/hotline Phone: 800-468-5469</p>
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