

Farm Credit Administration
Office of Inspector General

Inspection Report

**The Identification and Mitigation
Efforts for Key Position and
Personnel Dependencies at the
Farm Credit Administration**

I-23-03

February 20, 2024

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The Honorable Vincent G. Logan, Board Chairman and Chief Executive Officer
The Honorable Jeffery S. Hall, Board Member
The Honorable Glen R. Smith, Board Member
Farm Credit Administration
1501 Farm Credit Drive
McLean, Virginia 22102-5090

Dear Chairman Logan and Board Members Hall and Smith:

The Office of Inspector General (OIG) completed an inspection, *The Identification and Mitigation Efforts for Key Position and Personnel Dependencies at the Farm Credit Administration (FCA)*. The objective of this inspection was to analyze FCA's efforts to identify dependencies in key positions and personnel and mitigate the risks associated with those dependencies. We found that all FCA offices identified key position and personnel dependencies in some way, and some offices documented their efforts in succession plans or lines of responsibility.

However, the OIG found inconsistencies in how the Agency and FCA offices identified, documented, and mitigated the risk of key position and personnel dependencies. Specifically, the Agency has opportunities to promote knowledge transfer and improve employee development by providing and updating Agency-wide guidance. Finally, the OIG found that while FCA offices generally had a structure and grade distribution that mitigated key position and personnel dependencies, there are opportunities for improvement.

The OIG made five recommendations to improve FCA's process for succession planning and the identification and mitigation of key position and personnel dependencies. The recommendations focus on developing guidance for the identification of key position and personnel dependencies, leadership and executive development training, and analyzing how offices can improve their mitigation efforts and promote consistency in the Agency. FCA management agreed with, and provided responsive corrective actions for, all recommendations made in the report.

We appreciate the courtesies and professionalism extended by FCA, especially the Office of Agency Services and the Chief of Staff, to our staff during the inspection. If you have any questions, we would be pleased to meet with you at your convenience.

Respectfully,



Sonya K. Cerne
Assistant Inspector General for Audits, Inspections, and Evaluations

EXECUTIVE SUMMARY

The Identification and Mitigation Efforts for Key Position and Personnel Dependencies at the Farm Credit Administration

Report No. I-23-03

February 20, 2024

Objective

The objective of this inspection was to analyze the Agency's efforts to identify dependencies in key positions and personnel and mitigate the risks associated with those dependencies.

Recommendations

The Office of Inspector General made five recommendations to improve FCA's process for succession planning and the identification and mitigation of key position and personnel dependencies. The recommendations focused on developing guidance for the identification of key position and personnel dependencies, leadership and executive development training, and analyzing how offices can improve their mitigation efforts and promote consistency in the Agency.

Agency Response

Management agreed with and provided responsive corrective actions for all recommendations made in the report.

Why We Did This Inspection

The Farm Credit Administration (FCA or Agency) is an independent federal agency responsible for regulating and supervising the Farm Credit System (System). With a significant portion of its staff eligible to retire in the coming years, succession planning is one of the highest risks facing the Agency. We conducted this inspection to ensure FCA's process for the identification and mitigation efforts for key position and personnel dependencies was implemented in an effective and efficient manner.

How We Did This Inspection

We reviewed Agency positions and personnel by office. We reviewed and analyzed Agency data by grade level and office to determine impacts of retirement eligibilities through December 31, 2023, and then by December 31, 2030. We also reviewed office succession planning materials and identifications of key position and personnel dependencies, where applicable. We analyzed the techniques used by each FCA office to mitigate the risks associated with key position and personnel dependencies. The OIG analyzed employee job series, positions, and leadership and compared the results with office functions and staffing levels.

What We Found

The OIG found that all FCA offices identified key position and personnel dependencies, and some offices documented their efforts in succession plans or lines of responsibility. However, while each office identified key positions and personnel, there was a lack of consistency in the positions and personnel identified and documentation of dependencies. Additionally, the OIG found a wide variance in how the Agency and FCA offices individually mitigated the risk of key position and personnel dependencies. Specifically, the Agency has opportunities to promote knowledge transfer and improve employee development by providing and updating Agency-wide guidance. Finally, the OIG found that while FCA offices generally had a structure and grade distribution that mitigated key position and personnel dependencies, there are opportunities for improvement.

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BACKGROUND

Farm Credit Administration

The Farm Credit Administration (FCA or Agency) is an independent federal agency responsible for regulating and supervising the Farm Credit System (System). The Agency is responsible for ensuring that all System institutions are safe, sound, and dependable sources of credit and related services for all creditworthy and eligible persons in agriculture and rural America. In order to achieve this mission, FCA needs a reliable, trained staff to perform mission-related and support activities for the Agency.

FCA is facing a substantial risk relating to human capital due to the significant portion of the workforce's retirement eligibility. Due to this risk, part of effective management is identifying risks relating to key positions and personnel and appropriately addressing the risks associated with potential dependencies and succession planning needs.

FCA's Office of Agency Services (OAS) manages and delivers human capital, operational, and workforce development services for the Agency; however, every office and office director have a responsibility to ensure that their respective offices remain operationally efficient and effective.

Emphasis on Personnel and Succession Planning Risks

Strategic Planning

In its Strategic Plan for Fiscal Years (FYs) 2022-2026, FCA reinforces its commitment to human capital management. Specifically, in addition to other mission-related goals and objectives, FCA aligns efforts through Stewardship Objective 1: *Ensure a well-trained, engaged, and diverse staff working effectively in a safe, efficient, and modern workplace.* FCA also noted in the Strategic Plan that the Agency will strengthen its human capital initiatives that support succession management, employee development, and organizational effectiveness.

FCA defined key person dependencies in its Strategic Human Capital Plan for FY 2014-2018; however, it is unclear whether this definition is still applicable as it is not in the current Strategic Human Capital Management Plan for FY 2020-2024. The Strategic Human Capital Plan for FY 2014-2018 states the following:

"Key personnel are employees who are critical to the success of the Agency. If key personnel have roles that are not easily filled and bench strength is insufficient to fill these roles, then a KPD [key person dependency] exists, and business continuity and the successful accomplishment of the Agency's mission may be at risk. KPDs typically exist where employees possess unique leadership or subject-matter expertise that is not easily transferable, make decisions that directly affect the success of the Agency, and may possess significant tenure and institutional memory. KPDs are usually associated with mission-critical positions, but they may also involve positions that provide essential specialized support."

Enterprise Risk Management

FCA also addressed succession planning and the risks facing the Agency through its Enterprise Risk Management program. FCA outlines the top risks facing the Agency and identifies each risk, primary office with responsibility for the risk, scores, and whether a risk is increasing. The Agency designated three areas as high risk, with one noted as succession planning. The detailed succession planning risk contains the following description, "Key business functions could be negatively affected if there is no strategy for employee transition and knowledge transfer. If key leadership and technical positions do not have sufficient bench strength, knowledge transfer or access to talent pools, FCA will not be able to fulfill its mission effectively. In addition, retention and recruitment in a tight labor market also impacts the Agency's succession management efforts." The following are noted as mitigation strategies to the risk:

- Assess FCA workforce to identify most vulnerable risk areas;
- Develop an Enterprise Succession Plan that outlines strategies and actions to improve succession that may include, but is not limited to, knowledge sharing, transition plans, leadership profiles, targeted training and hiring, or early retirement incentives;
- Continue to develop current employees to ensure their readiness to assume leadership roles as they become available;
- Continue to offer internal mobility opportunities through our expressions of interest process;
- As it relates to recruitment and retention, continue to research, develop and implement enhanced benefits which are proven to be effective in meeting the needs of our employees, as well as match the needs of potential employees (candidates); and
- Continue to leverage results from the recruitment & retention workgroup.

Strategic Human Capital Management Plan

FCA has also emphasized the human capital risk facing the Agency in its development of a Strategic Human Capital Management Plan for FY 2020-2024. The plan establishes the human capital goals and strategies that support FCA in achieving its mission, goals, and objectives. Specifically, the plan outlines the strategic drivers, workforce analysis, findings and themes, human capital goals and strategies, and methods to monitor and evaluate progress.

Although the Agency had not finalized the plan or fully implemented the items, the plan identified several strategies for achieving human capital goals and objectives. The Strategic Human Capital Management Plan strategies that could reduce the risk facing the Agency in regard to key position and personnel dependencies and succession planning include:

- Develop a cross-agency rotational program to provide opportunities for experienced staff and supervisors to broaden their functional, technical, and leadership skills;
- Implement a leadership readiness program to provide aspiring leaders the necessary skills and experiences in preparation for team lead, supervisory, and management positions;

- Provide developmental opportunities and training to current supervisors and leaders to enhance their skills;
- Develop and implement a comprehensive, agency-wide succession management process; and
- Expand team-based developmental learning to build knowledge across offices and provide experiential learning opportunities to staff to broaden and deepen expertise.

The Strategic Human Capital Management Plan explains that the implementation of its strategies “will help to ensure that FCA is hiring the right candidates, training them in the most effective way possible, managing them as competent and capable employees, upgrading their skills to fulfill the future mission of FCA, and establishing conditions which aid in retention of essential personnel.” The plan also includes benchmarks for each of the strategies to help FCA measure, monitor, and evaluate progress.

Finally, the Strategic Human Capital Management Plan also highlights the need for succession planning by stating, “Leaders noted that while current succession planning processes have been working, especially for filling vacancies, FCA lacks a comprehensive and proactive approach that would build long-term capability.”

Guidance on Succession Planning

Agencies are required to have comprehensive management succession programs and to provide training to employees to develop agency managers. For example,

- Title 5, Code of Federal Regulations (CFR), section 412.201, *Management succession*, requires that the head of each agency, in consultation with the Office of Personnel Management (OPM), “develop a comprehensive management succession program based on the agency’s workforce succession plans, to fill agency supervisory and managerial positions.” It further explains that “the focus of the program should be to develop managers as well as strengthen organizational capability, and to ensure an adequate number of well-prepared and qualified candidates for leadership positions.” Succession management “programs must also be supported by employee training and development programs.”
- Title 5, CFR, section 412.202, *Systematic training and development of supervisors, managers, and executives*, requires that “All agencies must provide for the development of individuals in supervisory, managerial and executive positions, as well as individuals whom the agency identifies as potential candidates for those positions, based on the agencies’ succession plans.”

Standards for Internal Control

The United States Government Accountability Office's Standards for Internal Control in the Federal Government (Green Book) provide the overall framework for establishing and maintaining an effective internal control system.¹ In the Green Book, *Principle 4: Management should demonstrate a commitment to recruit, develop, and retain competent individuals*, under the control environment component, addresses the attributes needed for an effective control system relating to succession and contingency plans. The chart below shows some of the specific attributes relating to these areas.

4.06

Management defines succession and contingency plans for key roles to help the entity continue achieving its objectives. Succession plans address the entity's need to replace competent personnel over the long term, whereas contingency plans address the entity's need to respond to sudden personnel changes that could compromise the internal control system.

4.07

Management defines succession plans for key roles, chooses succession candidates, and trains succession candidates to assume the key roles. If management relies on a service organization to fulfill the assigned responsibilities of key roles in the entity, management assesses whether the service organization can continue in these key roles, identify other candidate organizations for the roles, and implements processes to enable knowledge sharing with the succession candidate organization.

4.08

Management defines contingency plans for assigning responsibilities if a key role in the entity is vacated without advance notice. The importance of the key role in the internal control system and the impact to the entity of its vacancy dictates the formality and depth of the contingency plan.

Human Capital Framework

OPM's Human Capital Framework also provides comprehensive guidance on strategic human capital management in the Federal Government.² The Human Capital Framework guides agencies to effectively manage an organization's talent by promoting the use of sound talent management practices. The Human Capital Management Framework explains that "Talent Management exists to ensure that organizations get the right people with the right skills into the right position at the right time so an agency can accomplish its mission." The framework defines talent management as "a system that promotes a high-performing workforce, identifies and closes skills gaps, and implements and maintains programs to attract, acquire, develop, promote, and retain quality and diverse talent." The talent management portion of the framework outlines the following:

¹ The United States Government Accountability Office's *Standards for Internal Control in the Federal Government*, September 2014, <https://www.gao.gov/assets/gao-14-704g.pdf>.

² OPM's Human Capital Framework, <http://www.opm.gov/policy-data-oversight/human-capital-framework/>.

1. Plan for and manage current and future workforce needs;
2. Design, develop, and implement proven strategies and techniques and practices to attract, hire, develop, and retain talent; and
3. Make progress towards closing any knowledge, skill, and competency gaps throughout the agency.

The Human Capital Framework also explains that succession management plans are a way to help facilitate leadership in the completion of human capital decisions and activities. Specifically, a succession management plan is used to communicate initiatives, programs, and activities associated with an agency's succession management strategy.

Continuity of Operations

While not considered a succession plan or guidance, FCA policy requires a comprehensive and effective strategy to ensure continuity of essential Agency functions under all circumstances. To support this policy, the Agency has implemented a Continuity of Operations Program which identifies essential functions and prioritizes them into National Essential Functions, Primary Mission Essential Functions, or Mission Essential Functions and specifies orders of succession and emergency delegations of authority.

As evidenced in the previous information, succession planning and the identification of dependencies is important. It is also important that the Agency does not create a biased approach to competition and respects the principles of Federal hiring. FCA must mitigate the risks of position and personnel dependencies without sacrificing competitive principles and human resource requirements.

Prior OIG Reports

The FCA Office of Inspector General (OIG) issued previous reports relating to key position and personnel dependencies, human capital management, and succession planning.

- **Human Capital Planning at the Farm Credit Administration** (February 29, 2016): The objectives of this audit were to assess the adequacy of FCA's human capital planning and the effectiveness of its implementation. The audit focused on three areas of human capital planning: key person dependencies and succession planning, employee hiring and separation, and workplace diversity and inclusion. The OIG found that FCA had an adequate human capital strategy with opportunities to improve human capital plan implementation and processes. The OIG made 11 recommendations in the report. All recommendations were closed by September 29, 2016.
- **The Farm Credit Administration's Employee Separation Process** (February 9, 2021): The objective of the audit was to determine whether FCA has an efficient and effective process for separating employees. The audit found that while the Agency had established policies and procedures, established access controls for its exit questionnaire data, and performed an analysis in 2019 using exit survey data, there were opportunities to improve the overall

effectiveness and efficiency of the separating process. The OIG made six recommendations in the report. All recommendations were closed by March 25, 2021.

- **The Farm Credit Administration’s Examiner Staffing Program** (January 30, 2023): The objective of this audit was to evaluate FCA’s examination staffing processes. The audit found the Agency devoted resources, and appropriately budgeted for, examination staff recruiting efforts. The Agency also implemented a variety of tools and processes to staff examination projects, and developed processes for scheduling, rotating, and retaining FCA examination staff. However, the audit identified opportunities to improve the examiner recruiting, scheduling, and staffing processes. The OIG made seven recommendations in the report. FCA Management closed five of the recommendations and two remained open as of the issuance of this report.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of this inspection was to analyze the Agency’s efforts to identify dependencies in key positions and personnel and mitigate the risks associated with those dependencies.

Scope

The scope of the inspection was limited to the Agency workforce as of July 2023 and retirement projections through 2030. The inspection was conducted at FCA’s headquarters in McLean, Virginia from July 2023 to February 2024.

Methodology

The OIG took the following steps to accomplish the objective:

- Identified and reviewed applicable laws, regulations, guidance, and other background information applicable to the objective.
- Identified and reviewed applicable internal FCA policies and procedures.
- Reviewed prior FCA OIG and other external reviews related to the inspection objective.
- Conducted interviews with the Chief of Staff and Chief Risk Officer, the leadership of each office within FCA, and other individuals within OAS that are responsible for strategic planning and training.

Tests Performed

The OIG performed the following tests to accomplish the objective:

- Reviewed the Employee Data Report for employee retirement eligibility, grade level, and offices. The Employee Data Report is an internal system utilized by FCA to track employee

information. The OIG received access to the information for this review and employee information was reviewed as of July 18, 2023. The OIG removed employees from the dataset that were designated as interns, temporary employees, and presidentially appointed positions. We also removed OIG and non-FCA personnel from the dataset. The OIG relied on the information in the Employee Data Report and did not perform independent testing of employee information, such as confirming the data through electronic personnel file testing. However, because we believe we can sufficiently rely on the information in an internally used system for this review, we will attribute the origin of the dataset to the Employee Data Report when making conclusions.

- Analyzed retirement eligibility based on employees' date of eligibility in the Employee Data Report. The OIG reviewed and analyzed Agency data by grade level and office to determine impacts of retirement eligibilities through December 31, 2023, and then by December 31, 2030. We selected these dates based on the projections through the year the review was conducted and through the end of the decade (2030) to understand the impact of retirements over a longer period of time.
- Reviewed office succession planning materials and identifications of key position and personnel dependencies, where applicable.
- Analyzed job series, positions, and leadership and compared the results with office functions and staffing levels.
- Analyzed the techniques used by each FCA office to mitigate the risks associated with key position and personnel dependencies. Specifically, the OIG reviewed how the offices promoted knowledge transfer and leadership and executive development by conducting interviews with Office Directors.

Quality Standards for Inspection and Evaluation

This inspection was performed in accordance with Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. These standards require that we plan and perform the inspection to obtain sufficient and appropriate evidence that provides a reasonable basis for our findings, conclusions, and recommendations. We assessed internal controls and compliance with laws and regulations to the extent necessary to satisfy the objective. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our inspection. We assessed the information and data collected during the inspection and determined it was sufficiently reliable and valid for use in meeting the inspection objective. We assessed the risk of fraud related to our inspection objective while evaluating evidence and had no matters come to our attention indicating fraud or illegal acts were occurring. Overall, we believe the evidence obtained is appropriate and sufficient to provide a reasonable basis for our findings and conclusions based on the inspection objective.

INSPECTION RESULTS

We determined that FCA had initiated certain efforts to identify dependencies in key positions and personnel and mitigate the risks associated with those dependencies. Specifically, the OIG found that:

- All offices have identified key position and personnel dependencies in some way;
- Some offices had documented efforts, such as succession plans or lines of responsibility;
- Offices generally had a structure and grade distribution that mitigated the risk associated with key position and personnel dependencies; and
- Some offices conducted skills inventories and had individual development plans for staff.

However, the OIG found that there was a lack of consistency in the positions and personnel identified and the documentation of dependencies. Therefore, the Agency has opportunities to promote knowledge transfer and improve employee development by providing and updating Agency-wide guidance.

Agency Risk

As noted above, FCA considers succession planning as one of the top risks facing the Agency. The need for succession planning at FCA is highlighted by the increasing number of retirement eligibilities among staff, especially when viewed at the office level and among leadership.

As of July 18, 2023, FCA's Employee Data Report included a total of 315 employees.³ According to the information in the data report, of those employees, 63, or 20 percent, were eligible to retire in 2023,⁴ and 98 employees, or 31.1 percent, were eligible to retire by 2030.⁵ When employee retirement data is broken down by office, the impact to FCA is more easily seen. Specifically, 4 of the 11 FCA offices have more than 35 percent of its staff as retirement eligible in 2023. Those offices include the Front Office⁶ (62.5 percent), Office of General Counsel (OGC) (38.5 percent), Office of Secondary Market Oversight (OSMO) (40 percent), and Office of Equal Employment

³ The Employee Data Report is an internal system utilized by FCA to track employee information. We received access to the report for this review and employee information was reviewed as of July 18, 2023. We removed employees from the dataset that were designated as interns, temporary employees, and presidentially appointed positions. We also removed OIG and non-FCA personnel from the dataset. The retirement eligibility date in the Employee Data Report is not for retirement exceptions that may be available to certain employees, such as early retirement eligibility. The OIG relied on the information in the Employee Data Report for the analyses in this report.

⁴ When referenced in this report as retirement eligible in 2023, we are referring to those noted with a retirement eligibility date through December 31, 2023.

⁵ When referenced in this report as retirement eligible in 2030, we are referring to those noted with a retirement eligibility date through December 31, 2030.

⁶ The OIG used the term "Front Office" for individuals assigned to the Office of the Board and the Office of the Chief Executive Officer – Chief Operations Officer. While the Employee Data Report included individuals from EEOI in this category, the OIG included EEOI as its own office for analytical purposes.

Opportunity and Inclusion (EEOI) (40 percent).⁷ Additionally, 8 out of 11 offices have a 2030 retirement eligibility percentage of over 35 percent, as noted in the table below.

Retirement Eligibility by Office for 2023 and 2030

Office	Percentage of Office 2023 Retirement Eligible	Percentage of Office 2030 Retirement Eligible
Front Office	62.5 percent	62.5 percent
EEOI	40 percent	60 percent
OAS	17.6 percent	47.1 percent
Office of the Chief Financial Officer (OCFO)	27.3 percent	36.4 percent
Office of Congressional and Public Affairs (OCPA)	16.7 percent	50 percent
Office of Data Analytics and Economics (ODAE)	30 percent	30 percent
Office of Examination (OE)	15.3 percent	22.4 percent
OGC	38.5 percent	53.8 percent
Office of Information Technology (OIT)	17.6 percent	44.1 percent
Office of Regulatory Policy (ORP)	21.7 percent	30.4 percent
OSMO	40 percent	40 percent

⁷ Over the course of our inspection there were leadership and structure changes in OGC, OSMO, and the Front Office.

Another way we reviewed the retirement data is by grade distribution. In accordance with the Farm Credit Act of 1971, as amended,⁸ the FCA Board Chairman sets and adjusts the rates of basic pay for FCA employees and provides such additional compensation and benefits as necessary to maintain comparability with the total amount of compensation and benefits provided by other Federal bank regulatory agencies. FCA utilizes the VH pay schedule for the compensation of its employees. The highest non-executive position in the VH pay schedule is VH 41, which would be equivalent to a 15 on the General Schedule. Executive positions on the VH pay schedule range from VH 42-45.

The highest percentage of FCA staff retirement eligibility are at the VH 41-45 levels. This includes the VH 42 grade level with a current retirement eligibility above 66 percent and the VH 41 level with a current retirement eligibility above 42 percent. In 2030, those totals jump to almost 78 percent for VH 42s and 57.1 percent for VH 41s. Because FCA’s highest concentration of retirement eligible employees are in executive and executive development positions, there is a risk that FCA could lose a significant portion of its senior staff at any time. This data also indicates an Agency-wide need for succession planning, especially at the highest levels in the organization.

Percent of Retirement Eligibilities in each VH Level

VH Grade	2023 Retirement eligible	2030 Retirement eligible
VH 45	100 percent	100 percent
VH 44	37.5 percent	75 percent
VH 43	40 percent	60 percent
VH 42	66.7 percent	77.8 percent
VH 41	42.9 percent	57.1 percent
VH 40	23.5 percent	33.3 percent
VH 39	11.9 percent	28.8 percent
VH 38	21.2 percent	30.3 percent
VH 37	2.3 percent	4.5 percent
VH 36	10 percent	30 percent
VH 35	0 percent	0 percent

⁸ Section 5.11(c)(2)(A) of the Farm Credit Act of 1971, as amended (12 U.S.C. § 2245(c)(2)(A)).

VH 34	6.3 percent	6.3 percent
VH 33	N/A	N/A
VH 32	N/A	N/A
VH 31	0 percent	100 percent

High Risk Examples

During our inspection, we reviewed the Agency’s data to identify specific potential high-risk areas for the Agency in terms of personnel, position, grade, and retirement eligibilities. We found the following key areas relating to the Agency:

- In OE, a high amount of retirement eligible personnel are in senior positions. Of the 183 employees, OE has 18 people at the VH 41-44 levels, which includes their entire management team. 12 of the 18 senior leaders, or 66.7 percent, were eligible to retire in 2023. Specifically, all employees at the VH 43-44 levels are currently eligible to retire and 80 percent of the VH 42s were eligible to retire in 2023. OE’s employees at the VH 41 level have a 54.5 percent eligibility rate for retirement in 2023 and 63.6 percent by 2030. Given that the VH 41 level is a typical feeder pool into executive positions, this retirement eligibility data underscores the need for effective succession planning.
- Agency-wide there are 58 persons, or 18.4 percent of the Agency, at the VH 41-45 levels. Almost half of the personnel at those levels, 27 of the 58 persons, were eligible to retire in 2023 (46.6 percent), and more than half by 2030 (63.8 percent).
- Of the executive level staff, which are those employees at the VH 42-45 levels, 12 out of 23 executives, or 52.2 percent, are eligible to retire as of 2023 and 73.9 percent by 2030.
- There are currently 81 persons at the VH 40 level, or 25.7 percent of the Agency, which is good news for future, potential leaders. However, 19 of those 81 are eligible to retire by December 2023, and 27 of those 81, or 33.3 percent, are eligible to retire by December 2030. The VH 40 level also is a potential internal candidate feeder pool for the higher grade and executive level positions.

While these examples only show a part of the full FCA workforce, they highlight the succession risks at the Agency and the need to properly mitigate such risks to ensure leadership continuity.

Process to Identify Key Position and Personnel Dependencies

While the OIG found that all FCA offices identified key position and personnel dependencies in some way, FCA did not have a consistent approach to identifying or documenting such key position and personnel dependencies. While we understand the need for flexibility, it is important to ensure that the risks for the specific offices, and the agency as a whole, are known, communicated, and have been properly mitigated. It is also important that Office Directors do not

create a biased approach to competition in the event of vacancies. FCA needs a fair and unbiased approach to succession planning that maximizes competition but mitigates the risks of position and personnel dependencies.

Succession Planning

The OIG found that FCA offices have all identified key positions and personnel, in some way, despite a lack of overall Agency guidance. Additionally, some FCA offices have documented succession plans, position responsibilities, and lines of succession to help reduce risk. However, we found a lack of consistency among FCA offices in the positions and personnel identified and in the documentation of key dependencies. For example, documentation of key positions and personnel varied from office to office, with some offices having written succession plans that outlined key dependencies and successors to others having no written succession plans.

OE and OCFO both had written succession plans that outlined key dependencies, identified successors, and listed retirement eligibilities for key dependencies. While ORP did not have a succession plan for the office, ORP Office Directive 1 outlined the line of succession for the Office Director, which identifies the Deputy Director and the VH 41 Team Leaders as potential successors in the event the Office Director cannot perform the role. In another approach, OCPA's internal procedures identify the primary and secondary staff members responsible for all office-related tasks. However, OAS, ODAE, OGC, OSMO, OIT, and EEOI did not have any written succession plans or documentation of key position and personnel dependencies.

Mitigation Efforts for Dependencies

Mitigation of key position and personnel dependencies focuses on preparing the Agency and individual offices for the loss of individuals. Thus, mitigation efforts focus on transferring the knowledge from those currently in the positions and developing the knowledge, skills, and abilities of possible successors.

The existence of key position and personnel dependencies is not inherently an adverse condition. Given the size, complexity, responsibilities, and resources of FCA offices, key position and personnel dependencies are going to exist as they do in any workplace organization. It is how the risk of loss in these key positions is addressed and mitigated that is important. There are a wide variety of ways the Agency, and individual FCA offices, might mitigate the risk of key position and personnel dependencies and the loss of employees. The impact on the Agency from losing key personnel can vary office by office. Each office should identify their risks, prioritize their mitigation efforts, and design strategies that work for them, as long as the overall Agency risks are also addressed.

One of the most mentioned mitigation factors for FCA is in its ability to attract and hire strong candidates. Several Office Directors discussed in our interviews that because FCA has a strong benefits and compensation package, the Agency is a very attractive employer for potential candidates. This can then correlate to good candidate pools when the Agency is hiring. This is especially important for offices that have skillset needs that are transferrable from other federal

agencies, such as legal, financial management, human resources, and information technology skillsets.

Another important concept revealed through our interviewing was the focus some FCA offices put on future needs when hiring rather than just looking to replace current skill sets. For example, ODAE leadership talked about the importance of looking to the future and understanding not just what is needed currently, but what might be needed in the future. This focus emphasizes the value of offices that are readied for innovations that may be on the horizon.

Skills and Abilities Identification

For mitigation techniques to be effective, it is important to understand current knowledge, skills, and abilities of staff in order to develop plans to fill gaps either through the hiring process, cross-training, or by developing current staff. However, the Agency has not required offices to identify the skills and abilities of their staff as a way to understand the gaps and risks in the offices.

Although FCA does not have a documented approach to performing a skills inventory, there appeared to be some movement in this area. For example, over the course of this inspection, ODAE performed a skills inventory for its staff economists and data scientists that included a listing of each staff member's education, experience, and technical skills. The ODAE Director stated this would aid in facilitating cross-training opportunities, balancing the skills and capabilities across domains in the team, and understanding whether the office has the expertise necessary to cover all the areas needed going forward.

The Director of OE stated that OE also has listings of which staff have completed the requirements to become a commissioned examiner. Although this is different from ODAE, it is another approach to understanding offices' current knowledge, skills, and abilities.

Knowledge Transfer and Employee Development

The Agency has opportunities to promote knowledge transfer and improve employee development. During our interviews, several FCA Office Directors indicated that knowledge transfer was a way of mitigating key position and personnel dependencies. Generally, Office Directors provided examples of cross-training, shadowing, on-the-job training, rotational assignments, and mentoring as ways their offices promote knowledge transfer.

Multiple Office Directors stated that there are FCA employees who have been in their current roles for a long period of time and have become Agency subject-matter experts. To reduce the risk that the Agency and the individual offices face from the departure of these staff members, it is important to ensure their knowledge is transferred to others in the Agency.

We found that most FCA offices took steps to promote knowledge transfer among their staff. The Director of ORP stated that the office promoted cross training by providing staff members the opportunity to work on different ORP teams to gain specialized experience. OGC leadership explained that the office promotes knowledge transfer by assigning multiple personnel with varying levels of experience to an assignment as on-the-job training. This allows one person to

be the expert and lead the assignment, while the other person gains new experiences in dealing with a particular subject matter. The OE Director explained that OE uses rotational assignments so that examiners can obtain training on the job ahead of possible job openings. The OE Director explained that rotational assignments are internally announced, a selection panel reviews the applicants, and the panel makes a selection. OE also has a mentoring program for certain staff. The Director of OIT stated that the office promotes knowledge transfer by having certain senior staff members mentor junior staff members. Additionally, OAS has begun to promote coaching and mentoring by hosting training events for staff and supervisors. OAS has also begun development of an internal site available to everyone in the Agency for leadership development, training, and resources.

While FCA offices each have their own processes for mitigating dependencies, there is an opportunity to improve how mitigation occurs and the extent to which it is offered amongst the offices. FCA could formalize knowledge transfer activities on an Agency-wide level by offering, for instance, additional Agency-wide rotational assignments, detail opportunities, and mentoring or coaching programs. Staff may miss opportunities for professional development because there is no program offered by their office. By formalizing knowledge transfer activities on an Agency-wide level, the Agency could improve mitigation of risks relating to dependencies and succession planning.

Individual Development Plans

Another way that some FCA offices promote knowledge transfer is through the use of individual development plans (IDPs). OCFO, OE, and ORP officials stated their offices utilize IDPs to track the training and development of their staff. The Director of OCFO stated that using IDPs has been a positive experience because the plans identify staff career goals and allows OCFO management to put staff in the position to achieve those goals.

Previously, the Agency required employees to complete an annual IDP in an Agency-wide database system that was coordinated with employees' supervisors. This system helped employees create structured personalized training and career development plans. However, the most current version of Policies and Procedures Manual (PPM) 843, *Training, Development, Professional Certifications, Licenses, and Membership Fees*, dated March 10, 2015, states that Office Directors have the discretion, but are not required, to utilize IDPs in their offices. The guidance goes on to state the following:

"IDPs should incorporate all aspects of employee development and experiences needed to meet employee career and organizational short and long-term objectives. It is the supervisor's responsibility under the guidance of their office to work with each employee to establish an IDP that outlines long-range career goals and short-range developmental objectives. The information on IDPs should be determined by the supervisor and the employee and reviewed by the Office Director (or designee) to ensure employee training and development will meet current and future Agency needs."

IDPs allow office leadership to set a training plan for staff members in order to help fill gaps created by key position and personnel dependencies. The IDP also assists office leadership in tracking the completion of training especially for those job functions that do not have continuing education requirements. One Office Director stated they frequently do not use their training budget because there are other priorities for staff. Another senior official stated that staff usually participate in conferences at the end of the year to complete professional requirements. More widespread use of IDPs could ultimately help promote knowledge transfer by placing an emphasis on knowledge transfer and employee development.

Leadership and Executive Development

The development and training of future leaders within FCA is key to mitigating position and personnel dependencies. Having a strong leadership and executive development program will enable FCA to put its employees in the best position for future leadership roles in the Agency. While the Agency promotes leadership and executive development, improvements to the process can be made.

An OAS representative stated that FCA follows the guidance set out in title 5, CFR, part 412, *Supervisory, Management, and Executive Development*. At section 412.202, the regulation states that "all agencies must provide for the development of individuals in supervisory, managerial and executive positions, as well as individuals whom the Agency identifies as potential candidates for those positions based on agencies succession plans."

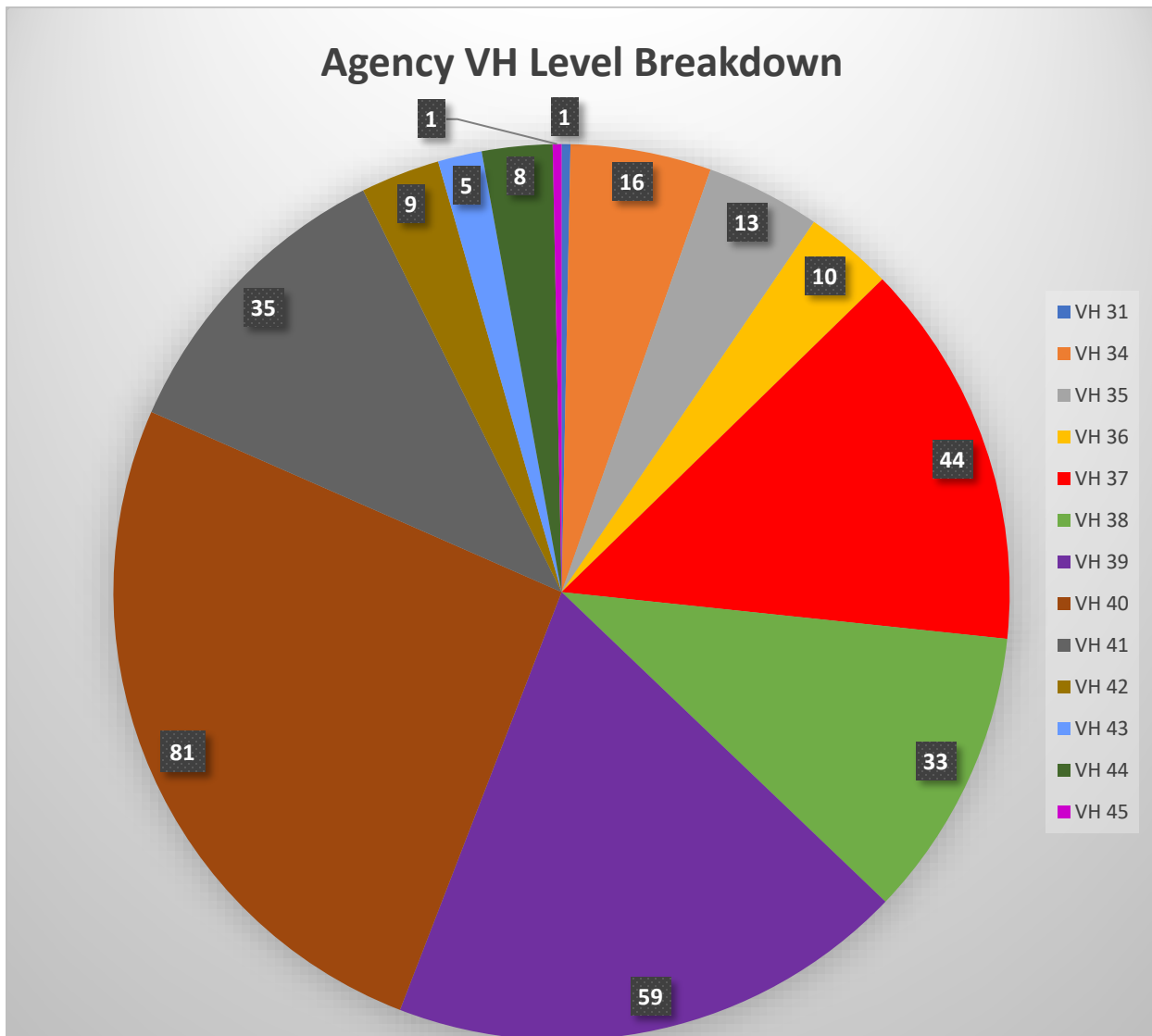
While FCA has utilized executive development programs, the nomination and selection process for those programs is unclear. An OAS representative stated that FCA encourages new executives (VH 42 levels and above) and potential executives (VH 40-41 levels) to attend an official executive development program. The OAS representative said that a call for nominations is announced by OAS, and Office Directors provide nominations. The selection of attendees is made by OAS and attendance is funded by OAS. OAS has a tracking system used to show which executives and potential executives have attended a course. However, the nominations and selection process for the executive development programs is not fully defined or documented.

As an example, one year a call for nominations to the programs was announced at a senior staff meeting and one year there was no call for nominations because attendees (including one non-executive) had already been selected. There appeared to be some confusion in the process and one Office Director said that they would like their staff at the VH 41 grade level to attend an executive development program, but the Agency never offered the opportunity to staff in their office.

By not having a documented process for the nomination and selection of candidates for an executive development program and what programs are available to staff, the Agency risks a biased approach and inconsistency with the Agency's human capital management goals. Without a clear process, the Agency may not be able to ensure the best candidates are being nominated and selected for executive development. This further puts the Agency at a disadvantage in mitigating key position and personnel dependencies.

Office Structure

The functionality, size, and mission of each FCA office require flexibility in the structure and distribution of VH levels amongst FCA offices. While the OIG found that FCA offices generally had a structure and VH distribution that mitigated key position and personnel dependencies, there are opportunities for additional analyses in this area. The following chart shows the distribution of the Agency's personnel by grade level.



The office structure and VH distribution of some FCA offices inherently foster internal continuity and succession planning efforts. For example, OE, ORP, OAS, and OCFO have a VH 44 Director and VH 43 Deputy Director. The existence of the VH 43 Deputy Director in these offices may provide a mitigation of the dependency on the Director position. OAS, OCFO, and ORP all have divisions that are managed by VH 41 staff that provide possible successors for the Deputy position. OE, based on its size, mission, and geographic distribution of examiners has multiple

executive level positions that provide possible successors for the Deputy position, along with VH 41 staff that provide possible successors for its other executive positions.

For EEOI, ODAE, OSMO, and OIT, after the VH 44 Director, the next highest VH levels for these offices are VH 41 positions, with certain offices only having one VH 41 position. OIT has a staff of 34 with three VH 41 level positions. OGC has a Deputy Director position (Deputy General Counsel) that mitigates the dependency on the General Counsel, as well as three non-supervisory VH 42 positions.

While it is important for the offices to remain flexible and have autonomy in decision making, it is also imperative for the Agency to mitigate key position or personnel dependencies. An analysis of the grade and supervisory roles in each office would reveal where, for example, leadership development skills and training may be needed to fill the gaps between the executive and staff levels at the Agency.

Root Causes

While FCA identifies succession planning as one of the highest risks facing the Agency, no Agency-wide guidance on succession planning or the identification of key position and personnel dependencies currently exists. Furthermore, while individual FCA offices took steps to promote succession planning and the identification of dependencies, the lack of consistency in the process can be attributed to a lack of overarching guidance. Additionally, outdated and underutilized Agency policies make it difficult to discern the difference between the process outlined in the policy and those that are currently practiced by the Agency. Finally, the missions, functions, and structures of FCA offices, along with the Coronavirus Disease 2019 (COVID-19) pandemic, made the prioritization and establishment of succession planning difficult to accomplish.

Control Structure

Inadequate controls contributed to inconsistencies in the identification and mitigation of key position and personnel dependencies at FCA. Specifically, there is no Agency-wide guidance on succession planning or the identification of key position and personnel dependencies. By not fully knowing the current knowledge, skills, and abilities along with the career goals and aspirations of its staff, FCA is not able to fully mitigate key position and personnel dependencies. As indicated in FCA's Strategic Human Capital Management Plan FY 2020-2024, the inconsistent use of IDPs results in staff career goals not always being known to management, which ultimately affects succession planning and the mitigation of key position and personnel dependencies. Whether or not FCA uses IDPs or other methods, identifying employee career goals, developmental opportunities, and training needs could help build organizational capacity and enhance engagement.

FCA policies and procedures describe a number of programs that could help the Agency promote knowledge transfer and improve the training and development of staff; however, some of these programs are not currently in use and the policies and procedures appear to be outdated. Specifically:

- PPM 811 establishes the procedures for FCA’s Upward Mobility Program. The policy was last updated in 1990 and does not appear to represent the current process used in the Agency. Specifically, the PPM refers to offices that no longer exist in FCA and discusses requirements for IDPs that are no longer required by FCA. Finally, there are no current employees formally attending the program.
- PPM 854 outlines the Agency’s Mentoring Program that provides mentoring opportunities to help address the professional development needs of employees. This PPM was last updated in 2003 and contains references to offices and processes that no longer exist at the Agency. There are no current employees formally attending the program.
- PPM 815 establishes the procedure for the Agency’s Long-Term Rotational Assignments Program. The PPM was last updated in 2008 and does not reflect the current processes used in the Agency. There are no current employees formally attending the program.
- PPM 853 provides guidance on FCA’s Supervisory Development Program. The PPM was last updated in 2003 and does not appear to represent the current processes used in the Agency. Specifically, the PPM references FCA offices and activities that are no longer current in FCA. There are no current employees formally attending the program.

There is currently an Agency-wide effort underway to revise Agency policies and procedures. Additionally, the OAS Director stated that OAS personnel will be reviewing the foregoing PPMs, along with others, to revise, combine, or sunset, them as needed.

Cost and Availability of Training Opportunities

The Agency has continued its practice of sending employees to leadership and executive development training. It is understood that executive and leadership development programs come at a cost to the Agency, and there are a limited number of spots available for the trainings. Because of these limitations, there is a need for guidance on the nomination and selection of staff to ensure a fair and equitable approach.

COVID-19 Pandemic

Human capital strategies and initiatives identified in the Strategic Human Capital Management Plan for FY 2020-2024 were not prioritized due to the COVID-19 pandemic, which brought many new human capital management challenges to the forefront of the Agency. This included directing most of its workforce to telework; suspending business travel and in-person training; and developing, implementing, and managing a return-to-work process for FCA headquarters and its field offices across the United States.

FCA’s response to the COVID-19 pandemic ultimately earned the Agency the highest score in the “COVID Overall” category across all federal agencies in the 2020 rankings for “Best Places to Work in the Federal Government.” As the Agency adjusts to the new-normal working environment, FCA has an opportunity to refocus planning for the future to include a prioritization of succession planning on both the Agency and individual office levels.

Impact

With a significant portion of its leadership and executive staff eligible to retire in the coming years, FCA has self-identified succession planning as one of the highest risks facing the Agency. While FCA offices are currently taking steps to promote succession planning and the mitigation of key position and personnel dependencies, a lack of consistency amongst the offices creates inefficiencies in the process.

By providing guidance that documents how key position and personnel dependencies are identified and documented at the office and Agency level, FCA can better mitigate the risks facing the Agency and create efficiencies in the succession planning process. Specifically, a multi-layered approach to succession planning that starts with strategic alignment and identifies the knowledge, skills, and abilities of current staff will ultimately help the Agency identify gaps created by key position and personnel dependencies. The Agency can then plan for, manage, and promote the development of staff to address the gaps and reduce the risk associated with key position and personnel dependencies.

Recommendations

To improve FCA's process for succession planning and the identification and mitigation of key position and personnel dependencies:

1. The Office of Inspector General recommends the Farm Credit Administration provide guidance to Office Directors on how to identify and mitigate key position and personnel dependencies to strengthen an Agency-wide succession program.
2. The Office of Inspector General recommends the Farm Credit Administration analyze whether the current office structures and use of grade levels allow for proper mitigation of succession risk.
3. The Office of Inspector General recommends the Farm Credit Administration analyze and update, rescind, or issue new guidance on training and development programs mentioned in the report, including setting forth the nomination, application, and selection criteria for leadership and executive development opportunities.
4. The Office of Inspector General recommends the Farm Credit Administration direct each office to identify skills and abilities in their offices to understand gaps, risks, and opportunities to assist in succession management activities where such identifications have not already been performed.
5. The Office of Inspector General recommends the Farm Credit Administration analyze whether individual development plans should be required or whether other methods could be employed to ensure that career goals, developmental opportunities, and training needs are addressed.

FCA Response

FCA management agreed with the five recommendations and provided responsive corrective actions for all recommendations made in the report. Specifically, management stated they will:

- Develop a succession planning framework and provide guidance to FCA leadership to support the identification of key positions and personnel dependencies across the Agency;
- Conduct a quantitative workforce analysis to identify trends and insights to help FCA identify key risk areas;
- Make recommendations to the FCA Board that support organizational structures and staffing models that facilitate efficient and effective achievement of strategic objectives, including succession planning and appropriate risk mitigation;
- Conduct an organizational design review focused on the alignment of office structures, positions, and grade levels with overall Agency mission and strategic objectives;
- Continue the agency-wide project focused on the review and update of internal policies and procedures. As part of this effort, FCA expects to analyze and update numerous policies and procedures, including those specifically mentioned in the draft report; and
- Explore whether individual development plans should be implemented agencywide.

Management estimated the actions would be completed by September 30, 2024.

OIG Response

OIG finds the actions responsive to our recommendations. Management comments can be found in the subsequent section of the report. The Agency waived an exit conference.

MANAGEMENT COMMENTS

The FCA appreciates the opportunity to respond to the Office of Inspector General's (OIG) draft inspection report titled, *The Identification and Mitigation Efforts for Key Position and Personnel Dependencies at the Farm Credit Administration*, issued on January 26, 2024. The OIG initiated this inspection based on a significant portion of the FCA workforce being eligible to retire in the coming years, coupled with the need to ensure FCA's process for succession planning was being developed, refined as needed, and implemented in an effective and efficient manner.

Management Response to the Recommendations

The FCA continuously strives to improve its operations and human capital planning, and to provide the support needed across the agency to carry out its mission, goals, and objectives. We believe the additional actions we will take in response to the recommendations below will strengthen our ongoing activities to ensure that the FCA continues to attract and retain the high-caliber workforce needed to ensure our nation's farmers and ranchers have access to dependable and affordable credit.

Recommendation 1: The Office of Inspector General recommends the Farm Credit Administration provide guidance to Office Directors on how to identify and mitigate key position and personnel dependencies to strengthen an Agency-wide succession program.

- **Management Decision:** Concur
- **Planned Action:** Recognizing succession planning is not a one-size-fits-all process, the FCA will develop a succession planning framework and provide guidance to FCA leadership to support the identification of key positions and personnel dependencies across the agency. FCA will engage with senior leadership to discuss specific needs, key person dependencies, and succession implications. In addition, FCA will conduct a quantitative workforce analysis to identify key trends and insights to help FCA identify key risk areas. This will help support agency leaders to implement the succession planning program, while regularly monitoring and documenting specific succession risks and needs, as well as mitigation strategies.
- **Estimated Completion Date:** September 30, 2024

Recommendation 2: The Office of Inspector General recommends the Farm Credit Administration analyze whether the current office structures and use of grade levels allow for proper mitigation of succession risk.

- **Management Decision:** Concur
- **Planned Action:** The FCA will conduct an organizational design review focused on the alignment of office structures, positions, and grade levels with overall agency mission and strategic objectives. In doing so, FCA will make recommendations to its Board that support organizational structures and staffing models that facilitate efficient and effective achievement of strategic objectives, including succession planning and appropriate risk mitigation.
- **Estimated Completion Date:** September 30, 2024

Recommendation 3: The Office of Inspector General recommends the Farm Credit Administration analyze and update, rescind, or issue new guidance on training and development programs mentioned in the report, including setting forth the nomination, application, and selection criteria for leadership and executive development opportunities.

- **Management Decision:** Concur
- **Planned Action:** As noted in the OIG's draft report, in 2023, the FCA launched an agency-wide project focused on the review and update of internal policies and procedures. As part of this

effort, FCA expects to analyze and update numerous policies and procedures, including those specifically mentioned in the draft report, i.e., PPMs 811; 854; 815; and 853. The Agency will also consider whether new policies or procedures need to be developed and/or if existing policies need to be rescinded.

- Estimated Completion Date: May 31, 2024

Recommendation 4: The Office of Inspector General recommends the Farm Credit Administration direct each office to identify skills and abilities in their offices to understand gaps, risks, and opportunities to assist in succession management activities where such identifications have not already been performed.

- **Management Decision:** Concur
- **Planned Action:** For the purposes of planned actions, the FCA will combine recommendations one and four. As such, the planned actions will be the same, i.e., Recognizing succession planning is not a one-size-fits-all process, the FCA will develop a succession planning framework and provide guidance to FCA leadership to support the identification of key positions and personnel dependencies across the agency. FCA will engage with senior leadership to discuss specific needs, key person dependencies, and succession implications. In addition, FCA will conduct a quantitative workforce analysis to identify key trends and insights to help FCA identify key risk areas. This will help support agency leaders to implement the succession planning program, while regularly monitoring and documenting specific succession risks and needs, as well as mitigation strategies.
- Estimated Completion Date: September 30, 2024

Recommendation 5: The Office of Inspector General recommends the Farm Credit Administration analyze whether individual development plans should be required or whether other methods could be employed to ensure that career goals, developmental opportunities, and training needs are addressed.

- **Management Decision:** Concur
- **Planned Action:** In the Federal Employee Viewpoint Survey (FEVS), employees are asked how well supervisors in their work unit support employee development. Recognizing that FCA earned the highest score on this question, across all Federal agencies in the 2022 best places to work rankings, FCA will continue to invest in practices and efforts that are yielding positive results and feedback and continue to look for innovative ways to support employee development. FCA will explore whether individual development plans should be implemented agencywide. Currently, the agency created a prototype personnel development plan (PDP) tool to support employee development that links agency goals and employee career goals to development opportunities. This prototype is currently under peer review. Additionally, the agency will continue to train and support professional training, learning, and developmental opportunities throughout the year, including during the creation of performance plans and office annual budgets.
- Estimated Completion Date: September 30, 2024

ACRONYMS

COVID-19	Coronavirus Disease 2019
EEOI	Equal Employment Opportunity and Inclusion
FCA or Agency	Farm Credit Administration
FY	Fiscal Year
IDP	Individual Development Plan
OAS	Office of Agency Services
OCFO	Office of the Chief Financial Officer
OCPA	Office of Congressional and Public Affairs
ODAE	Office of Data Analytics and Economics
OE	Office of Examination
OGC	Office of General Counsel
OIG	Office of Inspector General
OIT	Office of Information Technology
OPM	Office of Personnel Management
ORP	Office of Regulatory Policy
OSMO	Office of Secondary Market Oversight
PPM	Policies and Procedures Manual
System	Farm Credit System



Farm Credit Administration
Office of Inspector General

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Phone: (800) 437-7322 (Toll-Free)
(703) 883-4316

Email: fca-ig-hotline@rcn.com

Mail: 1501 Farm Credit Drive
McLean, VA 22102-5090

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