

Metropolitan Transportation Authority Office of the Inspector General

Review of Metro Mandatory Training

Our review found that Metro Training and Development Department and Operations Department have provided many training classes on a regular basis to employees to enhance their job capabilities. We also found several improvements could be made to enhance controls over mandatory training.

Report No. 15-AUD-02

January 12, 2015





Metro


Los Angeles County
Metropolitan Transportation Authority

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DATE: January 12, 2015

TO: Metro Chief Executive Officer
Metro Board of Directors

FROM: Karen Gorman
Inspector General 

SUBJECT: Report on Review of Metro Mandatory Training
(Report No. 15-AUD-02)

As part of our ongoing efforts to assist Metro in improving its economy, efficiency, and effectiveness of operations, the Office of the Inspector General (OIG) performed a review to evaluate the adequacy of controls over Metro mandatory training.

We found that the Metro Training & Development (T&D) Department has provided many training classes on a regular basis to employees to enhance their job related capabilities and skills. Our review also found opportunities to improve mandatory training such as:

- Consider ways to proactively implement a system to identify all employees who require mandatory training and notify the employees to register for the classes.
- Review the mandatory training classes listed in the SharePoint database to ensure that all mandatory training classes are annotated as “mandatory” in the database, and periodically review the database to ensure that information on the database is current.
- Identify what mandatory training is required for each Metro position.
- Encourage managers and supervisors to review required training with their employees when reviewing the employee’s performance and when preparing employee objectives for the coming year.
- Update the Metro Policy on Training, which has not been updated for over 13 years.
- Consider whether it is feasible and appropriate to put some training courses online so that employees could complete or take refresher training at a time and location convenient for them. This could provide additional opportunities for employees to complete mandatory training.

Metro management initiated corrective action. A copy of Management’s response is attached to this report.

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OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this review was to determine whether the controls over Metro mandatory training are adequate. To achieve the review objective, we performed the following:

- Reviewed and evaluated Metro’s current policies and procedures governing employee training;
- Interviewed staff in the T&D Department and other appropriate departments to gain an understanding of Metro mandatory training; and
- Reviewed and analyzed Metro computerized training classes.

We conducted this review in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We did not evaluate the content or quality of training provided. In addition, the Metro Purchase Card training was not included in this review because this training is solely under the control of the Procurement Department rather than the T&D Department.

BACKGROUND

Metro promotes and supports the professional development and training of its employees by offering development and training courses for meeting the current and future business needs. Metro maintains two Intranet websites for employees to view and sign up for classes, one for general and specialty classes and the other for Operations-related classes. Metro’s general training is coordinated by the T&D¹ Department while training related to transit operations is coordinated by Operations Central Instruction (OCI) under the Operations Department. The T&D Department and OCI share a master database that keeps track of the employees’ training.

T&D maintains an Intranet webpage from which employees may view and register for available classes. T&D periodically emails a listing of upcoming training classes that shows “Who Should Attend,” “What You Will Learn,” and “Objectives” with a link provided for employees to sign up to all Metro Email Recipients on a regular basis.

When an employee registers for a class, it is recorded in the database from which a sign-in sheet is printed at the time of the class. Employees sign the sign-in sheet as evidence that they attended the class. The class instructor collects the completed sign-in sheet when a class

¹ Formerly the Office of Development and Training Department.

is completed. Subsequently, the database is annotated that the employee attended the class and the sign-in sheet is scanned into the computer. The annotation and scanning of the sign-in sheet is sometimes done by an employee of T&D and at other times by the individual instructor.

Mandatory training ranges from one-time training, such as the “New Employee Orientation,” to those that need to be repeated periodically, such as “Sexual Harassment Prevention, Title VI and Title VII,” which is required by law for various managers every 2 years.

RESULTS OF REVIEW

1. Employees Required to Attend Mandatory Training Classes Are Not Identified

Metro’s system does not identify employees who are required to attend mandatory training classes for their job classification. As a result, it is not easy for Metro staff and managers to determine if they or their employees need to attend a mandatory training class. While Metro employee names are readily available by job classification (title), Metro has not specified what training is required for each job classification, and the job title itself is not always sufficient to determine whether the employee with such a job title needs to take a particular class. For example:

- The requirements for the “Hazard Communication” state, in part, “Attendance is mandatory for all Metro Managers and Supervisors who manage or supervise employees who handle or work with hazardous substances...” However, there are hundreds of employees who have the words Manager or Supervisor in their title, and the title alone is insufficient to determine who actually deals with hazardous substances.
- Another difficulty is that the job classification title may not always be sufficiently informative for matching to the training requirements. For example, some employees have the word “Manager” in their title (for example Transportation Planning Manager) but do not supervise any employees, which can make it difficult to determine the employee’s training needs.

The T&D Department sends out mass e-mails periodically to all recipients listing upcoming classes and the target audience, but it is generally up to employees and their supervisors to identify the need and register for the classes. The Training Coordinator sends notices to specific employees about mandatory training classes that are required, when the individual employees are identified.

- a. Some employees might not have attended mandatory training. Since there is no system to identify persons who are required to take mandatory training, there is little control to ensure that any particular individual actually attended the mandatory training. We examined the “Hazard Communication” job classification for managers

and found that five managers or supervisors in maintenance did not attend the mandatory class. These individuals had mistakenly taken the shorter “Hazard Communication for Employees” class. We verified with the five individuals that they took the other class; therefore, they now are aware that they should attend the class for supervisors. Since these classes have almost the identical titles, it was not readily clear to the employees which class was required.

b. System to identify persons required to take mandatory training. Since some individuals might not have attended all the mandatory training classes applicable to them, we believe that T&D should consider ways to proactively identify employees who need to attend these mandatory training classes such as:

- One possible tool to identify all employees who should attend mandatory training may be to survey managers (using the on-line survey tool to which T&D is already subscribed) to ask them what training should be required for each of the employee positions they manage, or what training class they need. The manager would review the list of all mandatory classes, including a description, and identify which course each position should take. Because the needs or duties of employees change over time, the survey should be repeated periodically.
- All managers/supervisors could be periodically notified of mandatory classes and be requested to notify employees to sign up their required classes, if appropriate.

The method chosen to proactively assure that all required employees attend mandatory classes should be incorporated into the Metro training policy.

2. All Mandatory Training Classes Are Not Identified in the Database

A SharePoint database was established that identifies the available courses, and has links to course descriptions that show the contents of the class and a description of those employees who are required to attend. The database has a field to show whether the class is mandatory. In our audit, we found that the database listed a total of 189 classes, of which 18 were marked as mandatory (see Attachment A for a list).

We reviewed the description for all classes and identified 24 additional classes that were mandatory for some staff by law, policy, or to operate equipment. Therefore, there are a total of 42 classes that are mandatory. We believe that the database should be updated, and periodically reviewed to assure that all mandatory training classes are marked in the database. The 24 additional mandatory classes, listed in Attachment B, appear to mostly relate to Operations areas. These classes might be known to and/or tracked by the OCI;

however, both T&D and OCI share the same database that list all classes including those marked as “mandatory” classes.

3. Metro Training Policy Needs Updating

Metro policy HR 8-2 (Human Resources Development and Training) is not up-to-date. All Metro policies are required to be reviewed and updated biennially for compliance with current laws, standards, and best practices.² HR-2 was implemented on January 12, 2001, and has not been updated for over 13 years.

HR 8-2 is general in nature; and it basically states that training exists and is available to employees. The current policy does not specify procedures, and does not reflect recent organizational changes. For example, the policy states that T&D and the Training Council should review the mandatory training classes at least annually to ensure that the training classes are updated and current. However, we were informed that the Training Council has been disbanded for several years. Accordingly, HR 8-2 should be updated in accordance with Metro requirements to reflect current organization and practices.

We believe that it is important to assure that all mandatory training is taken by appropriate employees. This assures that employees, managers, and supervisors have the skills needed to carry out their duties, and the knowledge to comply with laws and regulations. Failure to obtain necessary training could result in safety violations, increasing risk, or impacting Metro’s position in lawsuits.

4. Location of Training

Since training classes are given at many locations including the Gateway Building, the Central Maintenance Facility, and remote locations such as the divisions, we believe that using technology to expand coverage so that one instructor could teach employees at multiple locations simultaneously would make some training more efficient. This could include use of webinars, Smart Boards, webcams, and other techniques to broadcast training to remote sites. Another option is to video tape the training and post it online for access when the employee is available or has an immediate need for the training. T&D Department could work with OCI and the Information Technology Services (ITS) Department to explore means to use technology.

² General Management Policy GEN 5, Administrative Policies and Procedures, dated February 29, 2012.

CONCLUSION

We found that Metro has provided many training classes on a regular basis to employees to enhance their job skills. We also found several areas where improvements can be made to promote compliance with mandatory training requirements.

- Employees required to attend mandatory training classes are not identified.
- All mandatory training classes are not identified in the database.
- Metro training policy needs updating.
- Mandatory training that each position in Metro should complete is not determined.

RECOMMENDATIONS

The Training & Development Department should:

1. Consider ways to proactively set up a system to identify all employees who require mandatory training, and notify the employees to sign up for the required classes.
2. Update the SharePoint database by:
 - a. Reviewing the mandatory training classes listed in the SharePoint database to ensure that all mandatory training classes are annotated as “mandatory” in the database, and
 - b. Periodic reviewing the database to ensure that the information listed is current and all mandatory training classes are annotated.
3. Update the Metro Policy on Training, HR 8-2, in accordance with General Management Policy GEN 5.
4. Encourage managers and supervisors to review required training with their employees when reviewing the employee’s performance and when preparing employee objectives for the coming year.
5. Consider whether it is feasible and appropriate to put some training courses online so that employees could complete or take refresher training at a time and location convenient for them.

MANAGEMENT COMMENTS

On December 10, 2014, we provided Metro management a draft report. On January 9, 2015, management provided a response that stated Training & Development:

- Will work with other departments to identify all employees who require mandatory training.
- Will connect monthly with other relevant departments to ensure maintenance of the most current and up-to-date database of mandatory training classes.
- Has reviewed Policy HR 8-2 and will make recommendations for revision, particularly with regard to identifying mechanisms to more tightly monitor and pursue mandatory training compliance.
- Will collaborate with Human Resources to more strongly encourage mandatory training planning into the individual performance plan (IPP) process.
- Has already created one online mandatory training course (Drug & Alcohol Awareness) and is working on two others (Earthquake Preparedness and Human Trafficking). The Department will continue its efforts in utilizing the online platform for future mandatory training. (See Attachment C for a copy of management's response.)

EVALUATION OF MANAGEMENT COMMENTS

Management's proposed corrective actions are responsive to the findings and recommendations in the report. We, therefore, consider all issues related to the recommendations resolved based on the corrective action plan. However, staff should follow up on completing the implementation of the recommendations.

List of Mandatory Training Classes in the SharePoint Database

Class	Training Program	Attendees
Aboveground Storage Tank Management	Environmental Training Institute	Metro personnel that work with or around facility ASTs and management personnel responsible for those facility operators. Annual training
Bloodborne Pathogens Awareness	ETD (Employee Training & Development)	Workers in many different occupations are at risk of exposure to Bloodborne pathogens, including Hepatitis B, Hepatitis C, and HIV/AIDS. This exposure may be through needle sticks, sharps injuries, mucous membranes, and skin exposure contact with potentially infectious materials. First aid team members, housekeeping personnel janitors, mopper-waxers and service attendants (in some settings) are examples of workers who may be at risk of exposure. Workers and supervisors who in the normal course of employment may be exposed to body fluids • AND/OR when there is a change in assigned duties to one of the positions stated above; change in operation in which employees have not been trained before; and deviation from the procedures. Mandatory annual update.
CNG First Responder Training for Vehicle Operations	Corporate Safety	All VOs, TOSs, Management and other first responders.
Drug and Alcohol Reasonable Suspicion Determination	MOP	Attendance is mandatory for All Metro Chiefs, Executives, Directors, Managers and Supervisors who supervise safety-sensitive employees, and for those supervisory personnel who may be called upon to order a reasonable-suspicion-based test. The United States Department of Transportation (DOT) and the Federal Transit Administration (FTA) established this attendance mandate. Attendance is also beneficial for non-safety-sensitive Supervisors and Managers who are charged with the day-to-day implementation of the Metro/PTSC Alcohol and Drug-Free Work Environment policy. This course should be taken once every 3 years, or whenever there are major changes to the Metro policy or the DOT/FTA regulations. Priority will be given to Supervisors and Managers who have not yet taken the class, and the expectation is that all of these individuals will complete the class by the end of the current fiscal year. The class is offered each quarter.

List of Mandatory Training Classes in the SharePoint Database

Class	Training Program	Attendees
Hazardous Waste Management	Environmental Training Institute	Metro personnel who handle or manage hazardous waste which include transferring waste materials to designated storage areas, containerizing waste, labeling waste containers, and preparing waste for shipment (e.g., maintenance specialists, service attendants, and equipment maintenance supervisors). Annually.
Industrial Wastewater Management Training	Environmental Training Institute	All Facility maintenance personnel. Annually.
IPP Coaching Counseling	MOP	All non-contract managers and supervisors who are responsible for writing employee performance evaluations.
Mandatory Transit Operations Experience		The Chief Executive Officer has directed that this experience be required for all new employees who have not and will not operate a bus. They will be informed of this requirement at the initial NEO session. Employees who experience excessive stress and discomfort at the prospect of operating the bus will be excused from driving. They will be required to participate in the experience as an observer. Human Resources will provide OCI with a list of new hires scheduled to participate in the experience. OCI will report attendance to T&D. T&D will remind no shows and their supervisors that this is a mandatory experience and that waivers are granted by the CEO only.
New Employee Orientation (NEO)	NEO	All new employees i.e. regular, part-time, temporary and interns.
Procurement for Project Managers I & II	MOP	All Metro Program and Project Managers who manage and/or procure external contractors or vendors to support the successful completion of their program or project. This course is mandatory for Project/Program Managers with projects greater than \$5M and is designed for program/project Managers who will be involved with a procurement action(s).
Records Management and Information Security	MOP	Attendance is mandatory for Supervisors and above who have not attended the Records Management and Information Security training. This course is also highly recommended for Department Heads, Project Managers and administrative staff who are responsible for Records Management Compliance.

List of Mandatory Training Classes in the SharePoint Database

Class	Training Program	Attendees
Safety 1st – Frontline Safety Training	ETD	All Metro Employees
Sexual Harassment Prevention, Title VI and Title VII	MOP	Attendance is mandatory for all Metro Chiefs, Executives, Directors, Managers, Supervisors and lead persons who routinely direct the daily function(s) of another employee, and who have not attended this training within the last 2 years.
Spill Prevention and Response	Environmental Training Institute	Maintenance personnel who handle any hazardous and/or non-hazardous material, which includes the handling, storage, transportation, labeling and/or preparation of these materials for shipment. If this second group includes the staff listed above, then delete the first section (e.g. Maintenance Specialists, Service Attendants and Equipment Maintenance Supervisors). Annually.
Stormwater Pollution Prevention and Awareness	Environmental Training Institute	Facility managers and personnel. Annually.
Transit Terrorism Awareness Training	ETD	All Metro Employees
Underground Storage Tank Management	Environmental Training Institute	Metro personnel involved in the management and/or inspection of underground storage tanks (USTs). Annually.
Universal Waste Management	Environmental Training Institute	Maintenance Specialists, Service Attendants and Equip Maintenance Supervisors. Maintenance personnel who handle universal waste, which includes transferring waste materials to designated storage areas, labeling waste containers, and preparing waste for shipment.

List of Mandatory Training Classes Not Annotated as “Mandatory” in SharePoint Database

Class	Training Program	Attendees
AB1234 Ethics Training	Ethics	All Metro & EXPO Board of Directors or Governance Council Members promptly after assuming office (prefer with 30 days but no later than 1 year by law) every 2 years thereafter.
Acceptance Chart Recording	RFS (Rail Fleet Services)	Open only to RFS Maintenance Specialists and RFS Engineering. Required before collecting vehicle Acceptance data Calif. PUC requirement.
ADA Reasonable Accommodation Interactive Process	MOP (Management Orientation Program)	All Metro Chiefs, Executives, Managers, Supervisors or departmental personnel who determine or make recommendations regarding an employee's eligibility for reasonable accommodation under ADA or the California Fair Employment and Housing Act.
AnsaldoBreda P2550 Light Rail Vehicle Training	RFS	Open only to Rail Fleet Services Maintenance Specialists and RFS Engineering. Required before working on any of the vehicle's safety sensitive equipment; California PUC requirement.
Asbestos O and M Training	Corporate Safety	All Supervisors & Managers & staff who are responsible for maintenance & handling of asbestos-containing materials. Metro Mandate & CAL OSHA 528-Sec 1529 & 5208.
Brandt High-Rail Truck	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before Operating the Brandt Power-Unit on the Rail. Calif. PUC requirement.
Breda A650 Heavy Rail Vehicle Training	RFS	Open only to Rail Fleet Services Maintenance Specialists and RFS Engineering. Required before working on any of the vehicle's safety sensitive equipment; California PUC requirement.
Diversity Training for Managers. Note: while separately listed for new managers, this is the exact same course as “Sexual Harassment Prevention, Title VI and VII.”	MOP	This class is for newly appointed Metro chiefs, executives, managers and supervisors only. EEO Title VII and Assembly Bill, 1825 CAL Gov't Code 12950.1 (2006)n.

List of Mandatory Training Classes Not Annotated as “Mandatory” in SharePoint Database

Class	Training Program	Attendees
Ethics Training for Executive Personnel	Ethics	All incoming Executive Personnel.
First Responder Awareness (FRA) Level – Hazardous Materials Training	ETD	Anyone who responds to emergencies. CAL OSHA Requirement.
Forklift Operation	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before Operating a Forklift and then Refresher training every 3-years. OSHA requirement.
Hazard Communication	MOP	Attendance is mandatory for all Metro Managers and Supervisors who manage or supervise employees who handle or work with hazardous substances. The California Code of regulations, Title 8, Section 5194 (h) requires training of employees, at the time of initial assignment, when a new hazard is introduced into their work area and when employees are reassigned to conduct hazardous operations. This course was mandated by the Chief Executive Officer. CAL OSHA Title 8 Section 5149.
Hazardous Material Management for Bus Rail Operations	ETD	Metro employees who, handle, store and use hazardous materials. Safety Guidelines for labeling, handling & Storage of Hazardous Materials. California Code of Regulations, Title 8, section 4650.
Hegenscheidt Wheel True	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before operation of the Wheel True Machine Calif. PUC requirement.
Legal Development and Ethics for Managers	Management Orientation Program (MOP) (T&D program)	All Metro Chiefs, Executives, Directors, Managers and Supervisors who have not attended ethics or legal training within the past 3 years as indicated by OD&T’s training records.
New Maintenance Specialist Rail Vehicle Introduction	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required for all new Maintenance Specialists; Calif. PUC requirement; Cal OSHA requirements.

List of Mandatory Training Classes Not Annotated as “Mandatory” in SharePoint Database

Class	Training Program	Attendees
Nippon Sharyo P865 P2020 Light Rail Vehicle Training	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required for all new Maintenance Specialists; California PUC requirement; Cal OSHA requirements.
Re-Railing	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before leading a Re-Railing of a derailed rail cars. Calif. PUC requirement.
Shuttle Wagon Operation	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before Operating the Shuttle Wagon on the Rail. Calif. PUC requirement
Siemens P2000 Light Rail Vehicle Training	RFS	Open only to Rail Fleet Services Maintenance Specialists and RFS Engineering. Required before working on any of the vehicle’s safety sensitive equipment California PUC requirement.
Simmons Wheel Press	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before Operating the Wheel Press. Calif. PUC requirement.
Simmons Wheel True	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before operation of the Wheel True Machine Calif. PUC requirement.
Tire Press Operation	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before Operating the Tire Press. Calif. PUC requirement.
Unimog High-Rail Rescue Truck	RFS	Open only to RFS Maintenance Specialists and RFS Engineering. Required before Operating the Unimog on the Rail. Calif. PUC requirement.

Management Response to Draft Report



Metro

Interoffice Memo

Date	January 9, 2015
To	Karen Gorman Inspector General
Cc	Don Ott Executive Director, Employee & Labor Relations
From	Mike Thompson Director, Training & Development
Subject	Draft Report on Review of Metro Mandatory Training (Report No. 15-AUD-02)

Training & Development has reviewed the results of the subject audit report and concurs with the recommendations and findings of the audit. The responses to the report are below.

Recommendation 1:

Consider ways to proactively set up a system to identify all employees who require mandatory training, and notify the employees to sign up for the required classes.

Response: Training & Development will work with departments that require mandatory training to ensure that our existing system reflects all mandatory training required for each job class.

Recommendation 2:

Update the SharePoint database by:

- a. Reviewing the mandatory training classes listed in the SharePoint database to ensure that all mandatory training classes are annotated as "mandatory" in the database, and
- b. Periodic reviewing the database to ensure that the information listed is current and all mandatory training classes are annotated.

Response: Training & Development will connect monthly with other relevant departments to ensure maintenance of the most current and up-to-date database.

Recommendation 3:

Update the Metro Policy on Training, HR 8-2, in accordance with General Management Policy GEN 5.

Response: Training & Development has reviewed this policy and will make recommendations for revision, particularly with regard to identifying mechanisms to more tightly monitor and pursue mandatory training compliance.

Management Response to Draft Report

Recommendation 4:

Encourage managers and supervisors to review required training with their employees when reviewing the employee's performance and when preparing employee objectives for the coming year.

Response: Training & Development will collaborate with Human Resources to more strongly encourage mandatory training planning into the IPP process. The IPP training module for managers will also be modified to strengthen encouragement of this process.

Recommendation 5:

Consider whether it is feasible and appropriate to put some training courses online so that employees could complete or take refresher training at a time and location convenient for them

Response: Training & Development has already created one online mandatory training course (Drug & Alcohol Awareness), and is working on two others (Earthquake Preparedness and Human Trafficking). The Department will continue its efforts in utilizing this platform for future mandatory training.

Final Report Distribution

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