



United States Department of Agriculture
Office of Inspector General





Verifying Credentials of Veterinarians Employed or Accredited by USDA

Audit Report 50601-0001-31

What Were OIG's Objectives

The overall objective was to evaluate the effectiveness of USDA's verification of the credentials of veterinarians employed by USDA or those used to carry out USDA functions.

What OIG Reviewed

OIG reviewed APHIS' and FSIS' internal control structure for the hiring and accrediting of veterinarians to assess the adequacy of the process to ensure USDA veterinarians have the necessary credentials.

What OIG Recommends

APHIS and FSIS should establish control procedures on what constitutes an official transcript, appropriate transcript delivery methods, and the means to verify transcripts, equivalent degrees, and specialized experience when it qualifies the applicant for higher pay.

OIG audited APHIS and FSIS to assess whether their internal controls were adequate to ensure applicants or employees have the necessary credentials to be employed or accredited as USDA veterinarians.

What OIG Found

The Office of Inspector General (OIG) determined that the United States Department of Agriculture (USDA)—specifically the Food Safety and Inspection Service (FSIS) and the Animal and Plant Health Inspection Service (APHIS)—needs to strengthen its hiring processes to ensure that candidates are qualified for the Federal veterinarian positions to which they applied. USDA veterinarians are essential in safeguarding public and animal health, and it is important that they have the appropriate level of education and experience needed to perform their job. It is the responsibility of agencies' Human Resources (HR) departments to ensure that veterinarians are qualified to perform their essential job functions by reviewing applicants' information.

However, we found that APHIS and FSIS HR departments did not adequately verify prospective veterinarians' educational requirements, equivalent degrees, and specialized experience when it qualifies the applicant for higher pay. For example, agencies often accepted photocopies of transcripts submitted by the applicant in lieu of official transcripts as proof of education. This occurred because the agencies relied primarily on the Office of Personnel Management's (OPM) generalized guidelines and did not establish agency-specific guidance or procedures to verify and validate veterinarians' credentials. As a result, the Department may unknowingly hire unqualified employees to perform critical food safety duties.

APHIS and FSIS generally agreed with our recommendations and we accept management decision for these recommendations.



United States Department of Agriculture
Office of Inspector General
Washington, D.C. 20250



DATE: January 30, 2013

AUDIT
NUMBER: 50601-0001-31

TO: Kevin Shea
Acting Administrator
Animal and Plant Health Inspection Service
ATTN: Marilyn Holland

Alfred V. Almanza
Administrator
Food Safety and Inspection Service
ATTN: William C. Smith

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: Verifying Credentials of Veterinarians Employed or Accredited by USDA

Attached is a copy of the final report on the subject audit. Your written responses to the official draft report (dated December 5, 2012, and December 6, 2012, respectively) and the Office of Inspector General's (OIG) position are incorporated in the relevant Recommendations section of the report.

Based on your responses to our official draft report, we accept management decision for the recommendations in the report. You should follow your internal agency procedures for providing final action correspondence for the recommendations to the Office of the Chief Financial Officer. In accordance with Departmental Regulation 1720-1, final action should be completed within 1 year of the date of the management decisions to preclude being listed in the Department's annual Performance and Accountability Report.

We appreciate the courtesies and cooperation extended to us by members of your staff during our audit fieldwork and subsequent discussions.

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Background and Objectives

Background

In November 2005, the Food Safety and Inspection Service (FSIS) hired a veterinarian whose responsibilities included certifying the safety of pork shipped to St. Petersburg, Russia. Over four years later, a news broadcast claimed this individual provided false credentials. Eventually, in January 2012, this individual pled guilty to fraudulently creating and submitting false academic credentials in order to obtain employment and a subsequent promotion as an FSIS veterinarian.

The United States Department of Agriculture (USDA) employs and accredits veterinarians to perform a variety of key functions. First, veterinarians at FSIS, the public health regulatory agency, work toward preventing foodborne illnesses and protecting public health by investigating outbreaks of these illnesses, assessing State inspection programs, and designing new inspection systems and procedures. For example, public health veterinarians (also called veterinary medical officers) are leading members of FSIS' regulatory team, with the primary responsibility for making the critical examinations and dispositions of animals that are slaughtered and presented for further processing before the meat and poultry products are made available for consumption to the public. Second, the Animal and Plant Health Inspection Service (APHIS) is charged with protecting U.S. agriculture, in part by setting zoosanitary¹ standards that allow trade without the threat of introducing foreign diseases into the U.S. or diseases that are indigenous in the U.S. into foreign countries. Veterinary Services, a part of APHIS, prevents, controls, or eliminates animal diseases and monitors and promotes animal health and productivity.

APHIS Veterinary Services also administers the National Veterinarian Accreditation Program, a voluntary program that has over 63,000 accredited veterinarians. These veterinarians are considered the first line of defense for catastrophic disease events and perform certain regulatory functions on USDA's behalf. These veterinarians are certified and work cooperatively with Federal veterinarians and State Animal Health Officials.

As of 2011, APHIS and FSIS employed 1,713 veterinary medical officers (VMOs). APHIS employs 673 VMOs, of whom 30 were hired in fiscal year 2010 and 34 in fiscal year 2011.² APHIS has also accredited 63,160 non-Federal veterinarians, of whom 2,893 were accredited in fiscal year 2010 and 3,094 veterinarians in fiscal year 2011.³

FSIS employs 1,040 VMOs—103 of whom were hired in fiscal year 2010 and 82 in fiscal year 2011.⁴ The majority of both agencies' VMOs are educated in the United States; nearly a quarter

¹ Zoosanitary pertains to the cleanliness of animals or animal products.

² As of November 30, 2011.

³ As of December 1, 2011.

⁴ As of December 1, 2011.

of veterinarians in the United States receive educations from foreign, non-accredited institutions.⁵

The Office of Personnel Management (OPM) is responsible for developing and issuing minimum qualification standards, policies, and instructions governmentwide, including the standards for the Veterinary Medical Science Series (0701) or veterinary medical officers. Per OPM, APHIS' and FSIS' Human Resources (HR) departments have delegated examining authority and are responsible for qualifying applicants.⁶ The HR departments' responsibilities include reviewing resumes and supporting documentation for adequacy and completeness to ensure the applicants are qualified. Because of the severe shortage of candidates for these positions, OPM has approved direct-hire authority governmentwide.⁷

APHIS and FSIS HR officials also determine eligibility for employment, in part, by specialized education requirements. According to OPM, the candidate must have graduated with at least a Doctor of Veterinary Medicine (DVM) degree from a veterinary school or have received an equivalent form of education.^{8,9} If the applicant has a degree from a foreign, non-accredited institution, then the applicant must provide proof of English proficiency and one of the following equivalency requirements:

- American Veterinary Medical Association (AVMA), Educational Commission for Foreign Veterinary Graduates certification;
- Possession of a permanent, full, and unrestricted license to practice veterinary medicine;¹⁰
- Acceptance and placement into a veterinary medicine advanced degree, Master's degree, or residency or graduate program at a school or college of veterinary medicine, accredited by the AVMA.

For higher grade levels, the applicant must also have one year of specialized experience or advanced schooling in an area of specialization, such as import/export operations or food safety.

Objectives

The overall objective of this audit was to evaluate the effectiveness of USDA's verification of the credentials of veterinarians employed by USDA or those used to carry out USDA functions.¹¹

⁵ This number is based on an approximation from FSIS, as well as our random sample.

⁶ OPM delegates examining authority to the headquarters level. USDA is authorized to examine applicants for positions in the Department. The Department may reassign examining responsibilities to subordinate offices such as APHIS and FSIS Human Resource offices, which serve as “delegated examining offices.”

⁷ Direct-hire authority includes veterinary positions, GS-0701 at GS-11 through 15.

⁸ The term “veterinary school” refers to a school accredited by the American Veterinary Medical Association Council on Education (AVMA).

⁹ Equivalent form of education may include a Doctor of Veterinary Medicine degree at a school or college of veterinary medicine accredited by the AVMA.

¹⁰ License obtained in a State, District of Columbia, the Commonwealth of Puerto Rico, or a territory of the United States.

¹¹ APHIS accredits non-Federal veterinarians under the National Veterinary Accreditation Program. These veterinarians carry out USDA functions. During our audit work, we noted no issues with the program.

Specifically, we assessed whether APHIS' and FSIS' internal controls were adequate to ensure applicants or employees have the necessary credentials to be employed or accredited as USDA veterinarians.

Section 1: Verification of Veterinarian Credentials

Finding 1: USDA Does Not Always Obtain and Verify the Credentials of Veterinarian Applicants

We found weaknesses in key controls over APHIS' and FSIS' hiring processes. Specifically, APHIS' and FSIS' HR personnel did not take sufficient steps to ensure that candidates were qualified for the veterinarian positions they were applying for, which is one of an HR department's chief roles. While our review did not include verification of credentials in the 41 cases we sampled, both agencies did not ensure veterinarians met the required OPM qualification standards prior to appointment. First, APHIS' and FSIS' HR officials accepted applicant-submitted copies of official transcripts, rather than official transcripts provided by the awarding institutions. Second, both agencies did not verify that applicants educated at foreign, non-accredited institutions met the additional requirements. Lastly, both agencies did not know whether the necessary specialized experience listed on the resume was verified when required for higher pay. This occurred because APHIS and FSIS management did not make policy decisions and establish agency-specific verification methods to address issues related to the applicants' documents and, instead, relied on OPM's generalized guidance.

FSIS maintained it followed the requirements of OPM and provided a comprehensive book containing policies and procedures it feels met those requirements. However, OPM's requirements are not specific enough to verify educational requirements, equivalent degrees, and specialized experience. For example, we noted that the guidance does not provide specific information concerning acceptable transcript delivery methods, means to validate official transcripts and equivalent degrees, or methods to verify specialized experience. Without developing agency-specific procedures on the verification process for HR and other hiring personnel to follow, the Department may unknowingly employ veterinarians who are not qualified to perform their duties. Because veterinarians are integral in determining the safety of food for human consumption, it is crucial that they have the appropriate level of education and experience needed to perform their jobs.

Official Transcripts

As part of the application process, prospective FSIS and APHIS veterinarians are required to provide HR officials with documentation demonstrating they have the required experience and education for these positions. All veterinarians must have a DVM degree by the time they are hired. While an applicant can provide a copy of official transcripts during the initial phases of the application process, according to OPM guidance, hiring personnel must have and verify the official records before that applicant can be hired.¹² When we spoke with OPM officials, they stated that applicants were responsible for contacting the awarding school to ensure that the school forwarded

¹² The OPM Memorandum issued to Human Resources Directors, Subject "Official Documents," dated July 7, 2009, states that "[o]nce selected and prior to appointment, applicants must provide official documentation, for example, an official college transcript if they qualified based on education."

official transcripts. OPM officials do not consider transcripts to be official if provided directly from the applicant. OPM officials said that official transcripts instead should be sent directly from the school, via a sealed envelope, a secured website, or secured email.

However, we found that APHIS' and FSIS' HR personnel accepted both electronic and hard copy submissions, usually relying on applicants to provide the documents.¹³ In many instances, HR personnel accepted copied versions of official transcripts, in lieu of official transcripts. In other instances, HR personnel did not receive any form of the transcript. For example, in our sample, we did not locate 5 of 21 (24 percent) applicants' transcripts in the electronic Official Personnel File (eOPF) system and APHIS did not know if it had received transcripts from the 5 applicants.¹⁴ As of May 2012, all 5 official transcripts have been uploaded into the eOPF. FSIS' HR personnel likewise stated that they rarely obtained an original transcript.

These issues occurred because neither APHIS nor FSIS developed agency-specific guidance or procedures to address these issues.¹⁵ Therefore, both agencies' HR offices relied exclusively on OPM's implicit guidance, which does not specify how official transcripts should be received. OPM's guidance is not specific enough to stand alone as a sufficient control. Because APHIS and FSIS operated without formal procedures or guidance in place, regional HR personnel believed the documents they received were sufficient to verify the degree, while the APHIS national office was unaware such unofficial documents were being accepted as official versions.¹⁶

APHIS' and FSIS' controls that were in place over the transcript verification process were not sufficient to prevent these errors. At the time of our audit, FSIS had a multi-leveled second-party review to qualify applicants and verify that copies of transcripts were received; however, this review did not verify that the transcripts were official prior to appointment. While FSIS officials stated that they prefer clearer guidance from OPM before changing processes regarding official transcripts and equivalent degrees, they acknowledged that they should have better controls on what they can accept as an official transcript. After our January 2012 briefing with HR officials, FSIS has taken further measures to ensure that the official document is obtained and uploaded into the eOPF.¹⁷ First, FSIS' job postings now specify that applicants must provide "original Official

¹³ APHIS does not accept computer print-outs of official transcripts.

¹⁴ After researching the issue, APHIS HR staff stated in their written response, dated September 28, 2012, that two of the applicants included a copy of the official transcript in their online application, but those were not scanned (as required) into the eOPF. Indications are that HR did receive the official transcripts from the other three, but again, those were not scanned (as required) into the eOPF.

¹⁵ Both agencies developed standard operating procedures to provide guidance on processing of applications. FSIS issued advisory memos to clarify OPM's guidance and an Interview Policy directive. However, the documents do not provide guidelines on the issues we identified.

¹⁶ In our briefing with the APHIS national office, officials participated by providing comments whereas in our briefing with FSIS, the primary participants were FSIS HR officials in Minneapolis. The three national office officials who attended the briefing provided no comments to our potential issues, emphasizing that the HR office in Minneapolis oversees the hiring of veterinarians.

¹⁷ eOPF is a file containing records that cover a civilian federal employee's employment history and is the official record once documents have been scanned into an electronic format.

transcripts” if selected for a position. Second, FSIS states that it now visibly certifies the original official document, prior to scanning it into the eOPF in order to visually designate these electronic copies as official.

On the other hand, APHIS has not sufficiently addressed these issues. Although APHIS officials have strengthened their second-party review to include checking that they received official documents, APHIS considers any transcript that has an official stamp on it as official, even if it is a photocopy submitted by the applicant. Additionally, APHIS' job listings do not specify that applicants need to provide original transcripts, but, instead, state: “you **MUST** submit copies of official transcripts **before** your selection may be confirmed.” APHIS officials also explained that they do not have a procedure in place to ensure that the official document is stored and maintained in the eOPF. As a result, when APHIS officials checked applicant files for lost transcripts, the agency could not confirm that they had received official transcripts.¹⁸

In our May 2012 meeting with APHIS HR, staff members acknowledged that a better process should be established to ensure that documents were uploaded into the eOPF and briefly discussed how that process would work. While APHIS officials do believe it is important to develop a procedure to ensure that transcripts and other official documents are filed in the eOPF, the processes are not in place and they have not addressed the issues regarding obtaining official transcripts and designating them as official prior to uploading into the eOPF. We believe that these issues are significant enough to require corrective actions and remain concerned that errors—such as missing transcripts—will continue to go unnoticed and unaddressed without processes in place.

Documentation from Non-Accredited Institutions

For graduates of foreign, non-accredited veterinary schools, OPM officials stated that the agency should contact the applicable entity to validate additional required documents.¹⁹ In addition to an official transcript, these documents include either an Educational Commission for Foreign Veterinary Graduates certificate; State veterinary license; or acceptance letter from an AVMA veterinary medical school for placement into an advanced degree, postgraduate educational program, or training program; as well as proof of English language proficiency. The most commonly used form of documentation to support the equivalent degree is acceptance letters, which FSIS officials acknowledged could be falsified. Because of this, OPM officials suggest these documents be verified.

¹⁸ Because HR personnel did not distinguish between unofficial and official documents before putting them into personnel files, it was impossible to determine whether applicants fulfilled the requirement of providing official transcripts. Our sample size was small (20 out of 1,040 for FSIS and 21 of 673 for APHIS) and it was not in our scope to perform a thorough review of applicant files to determine eligibility or the eOPF system's quality; our audit scope was to determine only whether the agencies received official transcripts and other supporting documentation.

¹⁹ OIG acknowledged that obtaining documents from the source may be cost-prohibitive and problematic for the additional documents required for foreign-educated veterinarians. While OPM acknowledges that agencies may accept copies of original documents, OPM suggests verifying the authenticity of the documents with the originator.

However, we found that FSIS and APHIS HR personnel did not take the necessary steps to verify official, required documentation from applicants educated at foreign, non-accredited schools. FSIS HR personnel commented that they do not contact the originator of these documents unless there is an obvious problem, and make no further efforts to verify once the document has been received. HR personnel acknowledged that they do not routinely take steps to verify authenticity of documents, beyond the careful review of the documents, but rely on a number of investigation steps that come later in the process to verify credentials. APHIS HR personnel stated they do not verify the documents at all, but merely look for the words “veterinary university” in the letterhead or body of the text.

This occurred because neither agency has a procedure in place for their personnel to follow when verifying documentation. OPM stated that agencies should develop guidance and fine-tune OPM's overall guidance to suit their needs. As part of the Interagency Agreement between OPM and USDA, OPM agreed to provide “basic technical assistance,” while the Department agreed to establish “policies and procedures on the acceptance and processing of applications.” Like most agencies, FSIS and APHIS have applicants sign the Declaration for Federal Employment, in which the applicants certify that the information they have provided is accurate and truthful. However, we believe self-certification is not an adequate control to reduce the risk of falsification. HR personnel do not take further measures to verify the accuracy themselves, but rely upon investigative steps to verify this information. For example, the Special Agency Check verifies the applicants' identity and criminal history; however, the check does not ensure the applicants' package is truthful, as demonstrated by the FSIS case of hiring a non-veterinarian. In addition, background investigations are performed after the applicant is hired. Therefore, we maintain that both agencies' verification processes do not safeguard against potential cases of falsified documents and should be performed prior to a tentatively selected applicants' start date.

Specialized Experience

Federal qualification standards for higher-level veterinarian positions (at a GS 12 level or Pay Band 4 and above) require applicants to have at least 1 year of specialized experience or advanced schooling. OPM guidance suggests verifying this experience through reference checks once the applicant pool is narrowed down to the top candidates.²⁰ APHIS guidance states that APHIS officials should never make an offer without first doing an exhaustive check of the applicant's background. This investigation includes a comprehensive reference check, going back five years, and contacting a minimum of three sources that are knowledgeable about the applicant's abilities. While FSIS does not require pre-employment reference checks, it suggests verifying experience and has created a list of the information FSIS can request from previous employers, which includes the applicant's job title, description of duties, and dates employed.

²⁰ OPM, *Reference Checking*, page 3, November 20, 2008.

We found that both FSIS and APHIS were uncertain whether they had performed these reference checks. Although both agencies recommend or require verifying experience, neither agency had controls in place to confirm whether or not reference checks were performed. This occurred because HR personnel and selecting officials performed their tasks independent of each other, without proper coordination. HR personnel often only checked applicants' resumes to ensure applicants had the requisite experience and assumed selecting officials performed the reference check. However, selecting officials often believed that agencies' HR offices were performing the reference check; neither party confirmed that the appropriate steps were being taken. FSIS HR personnel commented that background checks are completed on every new hire, which include checking on the applicant's previous five years of employment. However, since the veterinarian position is one of public trust, the background investigation may not be completed until after the new hires have been on board for six months or longer. Therefore, APHIS and FSIS should consider establishing a process to document that the specialized experience is verified prior to hiring. Without a process in place, FSIS and APHIS cannot be certain that they are verifying that applicants have the required experience for their position.

Because of these internal control weaknesses, APHIS and FSIS have reduced assurance that veterinarians hired are qualified for their positions. If supporting documents, such as official transcripts, are not received or appropriately reviewed, agencies may hire unqualified candidates to perform critical roles in ensuring the safety and quality of the Nation's food supply. In addition, accepting photocopied documents without validation has a higher risk of falsification, and APHIS' and FSIS' insufficient oversight do not ensure that tentatively selected applicants have achieved the specialized experience listed in their applications and resumes. APHIS officials did not believe that the current verification process is an area of concern, noting that cases such as the 2005 fraudulent FSIS veterinarian case are rare. However, without performing background reviews on all veterinarians currently on board, APHIS cannot know with certainty whether or not their employed veterinarians possess the necessary credentials. As this would be a time consuming and costly task to perform, we are not including this recommendation at this time. However, it is important that controls are put in place and working effectively for future hiring. Because veterinary medical officers are key in determining the safety of food for human consumption, they must have the appropriate level of education needed to perform their job.

Recommendation 1

APHIS and FSIS should establish control procedures that (1) clarify the method and responsible person to verify official transcripts, (2) determine what constitutes official transcripts, and (3) establish acceptable methods of receiving official transcripts. The procedures should include controls to determine and document whether transcripts are official when received and to ensure official documents are filed into the eOPF.

FSIS Response

The Agency agrees and has begun the implementation of recommendation 1. FSIS' Human Resources Office (HRO) wrote internal policy guidance that outlines methods and

responsibilities related to the receipt and verification of official transcripts. FSIS has begun requiring that all applicants have their official transcripts sent directly from the veterinary college, in a sealed envelope or in an official electronic format, to the HRO before the new hires can report for duty. The new written procedures will be outlined in an advisory memo expected to be completed by March 2013.

OIG Position

We accept management decision for this recommendation.

APHIS Response

APHIS agrees with this recommendation. For the veterinarians it hires, APHIS will develop and implement an internal standard operating procedure (SOP) that will: (1) specify the responsible person to receive and verify official transcripts; (2) define an official transcript; (3) establish acceptable methods of receiving official transcripts; and (4) establish a method in which original, official transcripts are annotated in the eOPF personnel system as having been verified as an original, official transcript. APHIS will have the SOP completed by January 31, 2013. In addition, training will be provided to APHIS' Human Resources Division personnel to ensure understanding and uniform compliance with the requirements listed in the SOP.

OIG Position

We accept management decision for this recommendation.

Recommendation 2

APHIS and FSIS should establish control procedures clarifying the method and responsible person to verify supporting documentation for equivalent degrees for foreign-educated veterinarians and specialized experience for higher pay for tentatively selected applicants. These procedures should include controls regarding verification of reference checks when specialized experience qualifies the applicant for higher pay.

FSIS Response

The agency agrees with recommendation 2 and will issue and implement internal policy guidance that outlines methods and responsibilities related to verifying equivalent degrees and specialized experience. This new guidance will:

- clarify the method and responsible person to verify supporting documentation for equivalent degrees for foreign-educated veterinarians; and
- create mechanisms to review and then verify, if necessary, any questionable claims of specialized experience by tentatively selected applicants, especially if needed to receive higher pay.

FSIS will revise its procedures for applicants who have received their DVM degree from a foreign veterinary medical school that is not accredited by the AVMA. In order to determine eligibility, FSIS will expect original documents, from the AVMA or from the AVMA accredited veterinary college, used to meet DVM equivalency. If the applicant meets DVM equivalency with a veterinary license, FSIS will verify possession of a permanent, full and unrestricted license to practice veterinary medicine in the United States, prior to making an eligibility determination . These written procedures will also be outlined in an advisory memo.

FSIS will continue to adhere to the Agency's policy guidance, including all Agency issued advisory memos. These advisory memos outline the Agency's policy regarding specialized experience and higher than minimum pay setting authority under the Public Health Human Resources System, and they comply with 5 CFR 531.212. The advisory memos also specifically address the Delegation of Authority for higher than minimum pay setting based on specialized experience. FSIS expects to complete implementation of these actions by March 2013.

OIG Position

We accept management decision for this recommendation.

APHIS Response

APHIS agrees with this recommendation. In the same SOP referenced in recommendation 1, APHIS will establish the responsible person to verify supporting documentation for equivalent degrees for foreign-educated veterinarians and specialized experience for higher pay for tentatively selected APHIS applicants. The SOP will also contain procedures regarding reference checks for when specialized experience qualifies the applicant for higher pay. APHIS expects to complete implementation of these actions by January 31, 2013.

OIG Position

We accept management decision for this recommendation.

Scope and Methodology

We performed this audit to assess the controls for verifying credentials of veterinarians employed by USDA or those used to carry out USDA functions. We performed fieldwork from November 2011 to June 2012. Our review was conducted at APHIS' national offices in Washington, D.C. and Riverdale, Maryland, as well as OPM's national office in Washington, D.C. We visited APHIS' and FSIS' HR offices in Minneapolis, Minnesota, the APHIS Iowa area office in Des Moines, Iowa, and FSIS district offices in Des Moines, Iowa, and Beltsville, Maryland. We met with FSIS national officials on two occasions to discuss controls in place to hire veterinarians and to brief the officials on the results of our review. Rather than expanding our audit to review additional case files, we modified the audit steps to further develop the issues we identified in the existing control environment.

To accomplish our objectives, we performed the following audit procedures:

- Interviewed officials from APHIS' national office as well as APHIS' and FSIS' HR offices to determine what controls were in place to hire veterinarians.
- Interviewed officials responsible for selecting candidates in the APHIS area office, APHIS regional office, and two FSIS district offices to better understand their role in hiring veterinarians.
- Interviewed APHIS national office officials to understand how they ensure oversight of the National Veterinarian Accreditation program.
- Interviewed APHIS area office officials to better understand their role in accrediting non-Federal veterinarians.
- Interviewed OPM national office officials to better understand their qualification standards, policies, guidance, and other documents related to the hiring of veterinarians.
- Identified and reviewed APHIS' and FSIS' written policies and procedures, guidance, instructions, and administrative notices related to the hiring of veterinarians.
- Identified and reviewed OPM's qualification standards, guidance, memoranda, delegated examining operations handbook, etc., to gain an understanding of OPM's requirements to determine applicants' eligibility.
- Identified and reviewed documentation supporting the hiring and accrediting of veterinarians in our sample, including applications, resumes, *Notification of Personnel Action* (OPM's SF-50), *Request for Personnel Action* (OPM's SF-52), unofficial and official transcripts, State licenses, approval letters from accredited veterinary schools, proof of English language proficiency, National Veterinarian Accreditation training records, certifications, etc.
- Identified and reviewed published policies and procedures, regulations, application forms, fact sheets, training presentations, Veterinary Services Process Streamlining (VSPS) system information, and other documents related to the National Veterinarian Accreditation program to gain an understanding of the provisions, requirements, and controls related to the program.
- Reviewed 41 randomly selected veterinarian electronic personnel files, using a template to determine if the files contained the required documentation to support the eligibility determinations.
- Reviewed 20 randomly selected accredited non-Federal veterinarian files, using a template and the VSPS system to determine if the files contained the required documentation to

support the accreditation determinations. Although we relied on information from the VSPS system, we did not verify information in the system, nor did we test any of the data for accuracy or validity.

As of 2011, APHIS and FSIS employed 1,713 veterinary medical officers (VMOs). APHIS employs 673 VMOs, of whom 30 were hired in fiscal year 2010 and 34 in fiscal year 2011.²¹ We randomly selected 21 of these 64 veterinarians for our record review.

As of December 2011, APHIS accredited 63,160 non-Federal veterinarians, of whom 2,893 were accredited in fiscal year 2010 and 3,094 veterinarians in fiscal year 2011. We randomly selected 20 of these 5,987 veterinarians for our record review.

FSIS employs 1,040 VMOs, of whom 103 were hired in fiscal year 2010 and 82 were hired in fiscal year 2011.²² We randomly selected 20 of these 185 veterinarians for our record review. The majority of both agencies' veterinarians are educated in the United States; less than a quarter of veterinarians in the United States receive educations from foreign, non-accredited institutions.²³

Our audit was conducted 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.

²¹ As of November 30, 2011.

²² As of December 1, 2011.

²³ This number is based on an approximation from FSIS, as well as our random sample.

Abbreviations

APHIS	Animal and Plant Health Inspection Service
AVMA	American Veterinary Medical Association
DVM	Doctor of Veterinary Medicine
eOPF	electronic Official Personnel File
FSIS.....	Food Safety and Inspection Service
HR.....	Human Resources
HRO	Human Resources Office
OIG	Office of Inspector General
OPM.....	Office of Personnel Management
SOP	Standard Operating Procedure
USDA.....	United States Department of Agriculture
VMO	Veterinary Medical Officer
VSPS.....	Veterinary Services Process Streamlining

**USDA's
FSIS' AND APHIS'
RESPONSES TO AUDIT REPORT**



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

TO: Gil H. Harden
Acting Assistant Inspector General
Office of Inspector General

FROM: Alfred V. Almanza / s / **December 6, 2012**
Administrator
Food Safety and Inspection Service

SUBJECT: Office of Inspector General (OIG) Official Draft Audit Report – Verifying
Credentials of Veterinarians Employed or Accredited by USDA, Report number
50601-0001-31

The Food Safety and Inspection Service (FSIS) appreciates the opportunity to review and comment on the draft audit report: Verifying Credentials of Veterinarians Employed or Accredited by USDA. We have provided one comment and responded to the two recommendations.

FSIS Comment The report's characterization that FSIS' Human Resources Office (HRO) did not adequately verify prospective veterinarians' educational requirements, equivalent degrees and specialized experience is inaccurate. FSIS agrees that more guidance is needed; however, we do verify all candidates' submissions per relevant Office of Personnel Management (OPM) guidance to ensure candidates are qualified for the veterinarian positions they apply for.

OIG Recommendation 1 APHIS and FSIS should establish control procedures that (1) clarify the method and responsible person to verify official transcripts, (2) determine what constitutes official transcripts, and (3) establish acceptable methods of receiving official transcripts. The procedures should include controls to determine and document whether transcripts are official when received and ensure official documents are filed into the electronic Official Personnel Folder (eOPF).

FSIS Response The Agency agrees and has begun the implementation of recommendation 1. FSIS HRO wrote internal policy guidance, that outlines methods and responsibilities related to the receipt and verification of official transcripts. FSIS has begun requiring that all applicants have their official transcripts sent directly from the veterinary college, in a sealed envelope or in an official electronic format, to the HRO before the new hires can report for duty. The new written procedures will be outlined in an advisory memo.

Completion Date: FSIS will complete the advisory memo by March 2013.

OIG Recommendation 2 APHIS and FSIS should establish control procedures clarifying the method and person responsible for verifying the supporting documentation for equivalent degrees for foreign-educated veterinarians and specialized experience for higher pay for tentatively selected applicants. These procedures should include controls regarding verification of reference checks when specialized experience qualifies the applicant for higher pay.

FSIS Response The Agency agrees with recommendation 2 and will issue and implement internal policy guidance that outlines methods and responsibilities related to verifying equivalent degrees and specialized experience. This new guidance will:

- clarify the method and responsible person to verify supporting documentation for equivalent degrees for foreign- educated veterinarians; and
- create mechanisms to review and then verify, if necessary, any questionable claims of specialized experience by tentatively selected applicants, especially if needed to receive higher pay.

FSIS will revise its procedures for applicants who have received their DVM degree from a foreign veterinary medical school that is not accredited by the American Veterinary Medical Association, Council on Education (AVMA). In order to determine eligibility, FSIS will expect original documents, from the AVMA or from the AVMA accredited veterinary college, used to meet DVM equivalency. If the applicant meets DVM equivalency with a veterinary license, FSIS will verify possession of a permanent, full and unrestricted license to practice veterinary medicine in the United States, prior to making an eligibility determination. These written procedures will also be outlined in an advisory memo.

FSIS will continue to adhere to the Agency's policy guidance; including all Agency issued advisory memos. These advisory memos outline the Agency's policy regarding specialized experience and higher than minimum pay setting authority under the Public Health Human Resources System (PHHRS), and they comply with 5 CFR 531.212. The advisory memos also specifically address the Delegation of Authority for higher than minimum pay setting based on specialized experience.

Completion Date: FSIS will complete full implementation of the actions stated above by March 2013.

If you have any questions, please contact Jane Roth, Deputy Assistant Administrator, Office of Program Evaluation, Enforcement and Review, at (202) 720-8609.



United States
Department of
Agriculture

Animal and Plant
Health Inspection
Service

Washington, DC
20250

MEMORANDUM

TO: Gil H. Harden
Assistant Inspector General
for Audit
December 5, 2012

FROM: Kevin Shea /s/
Acting Administrator

SUBJECT: APHIS Response on OIG Report, "Verifying Credentials
of Veterinarians Employed or Accredited by USDA"
(50601-01-31)

The Animal and Plant Health Inspection Service (APHIS) appreciates the opportunity to comment on this report. We have addressed below each Recommendation along with our planned corrective actions and the timeframes for implementation of these actions, as they pertain to APHIS.

Recommendation 1: APHIS and FSIS should establish control procedures that (1) clarify the method and responsible person to verify official transcripts, (2) determine what constitutes official transcripts, and (3) establish acceptable methods of receiving official transcripts. The procedures should include controls to determine and document whether transcripts are official when received and ensure official documents are filed into the eOPF.

APHIS Response: APHIS agrees with this Recommendation. For the veterinarians it hires, APHIS will develop and implement an internal standard operating procedure (SOP) that will: (1) specify the responsible person to receive and verify official transcripts; (2) define an official transcript; (3) establish acceptable methods of receiving official transcripts; and (4) establish a method in which original, official transcripts are annotated in the eOPF personnel system as having been verified as an original, official transcript. APHIS will have the SOP completed by January 31, 2013. In addition, training will be provided to APHIS' Human Resources Division personnel to ensure understanding and uniform compliance with the requirements listed in the SOP.

Recommendation 2: APHIS and FSIS should establish control procedures clarifying the method and responsible person to verify supporting documentation for equivalent degrees for foreign-educated veterinarians and specialized experience for higher pay for tentatively selected applicants. These procedures should include controls regarding reference checks when specialized experience qualifies the applicant for higher pay.



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Agency Response: APHIS agrees with this Recommendation. In the same SOP referenced above, APHIS will establish the responsible person to verify supporting documentation for equivalent degrees for foreign-educated veterinarians and specialized experience for higher pay for tentatively selected APHIS applicants. The SOP will also contain procedures regarding reference checks for when specialized experience qualifies the applicant for higher pay. Again, this SOP will be completed by January 31, 2013.

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