



DEPARTMENT OF THE NAVY
NAVAL INSPECTOR GENERAL
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IN REPLY REFER TO:
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Ser 00K/0341
26 Mar 15

Catherine A. McMullen
Chief, Disclosure Unit
U.S. Office of Special Counsel
1730 M Street, N.W., Suite 300
Washington, D.C. 20036-4505

Re: OSC DI-11-3779 (NIGHTS 201103602)
Concurrent Certification Program, Fleet Readiness Center SouthWest

Dear Ms. McMullen:

This letter encloses the official record copies of the April 24, 2014 supplemental report that I provided your office in May of 2014. At that time, I sent you a copy of the supplemental report in Microsoft Word format, but did not include a version suitable for public release should OSC decide to post the supplemental report to its public website. I apologize for not creating the public release version of the report and converting both of them to the portable document file (Acrobat PDF) format for your convenience at that time.

I am authorized to transmit these documents to you on behalf of the Naval Inspector General who, in turn, is authorized to provide them to you on behalf of the Secretary of the Navy.

Please contact me at 202-433-2223 should you have any questions.

Sincerely

A handwritten signature in black ink, appearing to read "Lawrence J Lippolis".

Lawrence J Lippolis
Counsel

Enclosures:

- (1) OSC 10-3779 NIGHTS 201103602 FRCSW CONCERT Supplemental Report 24 April 2014
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- (2) OSC 10-3779 NIGHTS 201103602 FRCSW CONCERT Supplemental Report 24 April 2014
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Office of the Naval Inspector General

OSC Case Number DI-11-3779, 3872 & 38940
NAVINGEN Case Number 201103602

Supplemental Report of Investigation

24 April 2014

FLEET READINESS CENTER SOUTHWEST, NORTH ISLAND, CA
CONCURRENT CERTIFICATION PROGRAM

Preliminary Statement

This supplemental report responds to four questions posed by the Office of Special Counsel (OSC) after reviewing the original report of investigation in this case, dated October 2, 2012. To facilitate the reader's review, each numbered paragraph corresponds to the corresponding question posed by OSC. The responses to each question appear as lettered sub-paragraphs below the numbered question.

Questions and Responses

1. What is the status of the Naval Audit Service report? The status of the audit report was last requested in November 2013 and it was not final at that time.

a. The Naval Air Systems Command (NAVAIR) Inspector General (IG) has not received the report from the Naval Audit Service (NAVAUDSVC). The NAVAUDSVC is close to releasing a discussion draft, but the final report is not expected for one or two more months.

2. What is the status of investigation 201203116?

a. The Fleet Readiness Center Southwest (FRCSW) Command Evaluator (CE) determined that the Naval Air Station North Island Human Resource Office (HRO) already was conducting a management inquiry into allegations that four people had falsified resumes when witnesses interviewed during the ConCert investigation identified seven other people they believed had submitted duplicate, or nearly identical, resumes, and consequently may have falsified their qualifications. The FRCSW CE provided the names to the HRO for inclusion in the management inquiry, and tracked the progress of that inquiry to its conclusion.

b. The HRO Management Inquiry determined that:

Suitable for Public Release
(names omitted)

(1) A WG-4102-09 painter misrepresented his qualifications by listing duties and skills he did not possess, and consequently falsified his resume. FRCSW proposed removing the individual from federal service; eventually the parties agreed to a settlement in which the individual was reduced in grade to a WG-4102-07 painter.

(2) A WG-2892-10 aircraft electrician provided inaccurate information on his resume by making statements about his qualifications that his work history did not support. FRCSW proposed removing the from federal service; eventually the parties reached a settlement agreement that resulted in the individual being reduced in grade to a WG-2892-05 aircraft electrician.

(3) A WG-8852-08 aircraft worker resigned his position while under investigation for having stated he was already a WG-08 when seeking employment, although he was only a WG-05 at that time.

(4) A fourth individual, alleged to have misrepresented his qualifications while applying for a position at FRCSW, was not hired.

3. What is the status of QAS hiring?

a. There were no QAS hiring's in 2013 due to the hiring freeze; however, there were four GS-1910-11's hired in January 2014 and six GS-1910-9's hired in February 2014. An additional seven GS-1910-9 positions were submitted to the PMB and for hiring approval. These seven GS-1910-9 positions were approved for hiring on 5 May 2014. FRCSW QA is now in the process to hire those additional seven QAS positions.

4. What is the status of recommendations made in the report, including disciplinary actions?

a. The following are all the recommendations and corrective actions that have been taken by FRCSW as a result of the ConCert investigation. The recommendations and actions have been broken down by allegation. All corrective actions are complete except for those that may be a result of the NAVAUDSVC pending report.

(1) Allegation 1: That FRCSW management failed to hire qualified candidates for AI positions.

(a) Recommended Action 1: Include a more detailed explanation of necessary qualifications in job announcements and the FRCSW Quality Manual, such as number of years working independently on a specific aircraft platform and trade area. Include specific training areas completed such as egress; tire and wheel maintenance; corrosion control; specific to the position being advertised.

1. Response: Ranking criteria includes a clearly defined minimum of three years of experience on the specific aircraft platform and trade in order to be highly qualified for selection.

(b) Recommended Action 2: Make ConCert an assessable unit in the FRCSW Internal Controls Program and periodically review all IQRs to ensure they are accurate and current as an internal control.

1. Response: ConCert was placed in MIC program as an Assessable Unit on June 27, 2012.

(c) Recommended Action 3: Review IQRs of FRCSW employees as part of the hiring process. Preferably, provide all potential applicants an opportunity to update their IQRs in advance of any vacancy announcement. Require similar verification of those who are not FRCSW employees if they are eligible to compete for a position.

1. Response: IQRs are available and are reviewed as part of the selection process.

(d) Recommended Action 4: Interview AI applicants in person as part of the selection process and ensure that a QAS actively participates in the interview before an applicant is offered an AI position.

1. Response: QA is now required to be on the panel and will be able to stop the selection of an individual if they have documented evidence that the individual is a substandard performer or is not qualified for the position.

(e) Recommended Action 5: The Quality Department should have a more active role in the hiring process of the AI instead of the Production Department. The Quality Department should initiate the hiring action, write the position description, review the cert, interview the candidates, and make the selection.

1. Response: QA personnel are required on all AI hiring panels. QA works with Production to ensure only highly qualified individuals are selected. QA also reviews position descriptions (PD) as additional AIs are hired and ensures that each PD has specific inspection/verification content.

(f) Recommended Action 6: The HR Department should notify individuals selected for a position, not the Production Supervisor.

1. Response: The selection official or the HR Representative will notify the individual selected for the position.

(g) Recommended Action 7: NAVAIR IG will conduct a separate investigation into the duplicate resume issue under NIGHTS 201203116.

1. Response: See Paragraph 2, Page 1, of this report.

(h) Recommended Action 8: Revise Quality Manual to reflect current NAMP including making it clear that AIs report to Quality Department when performing inspections.

1. Response: The two day ConCert training package has been updated to ensure all trainees are aware of the fact that they are working for the QA department when performing their AI duties. Additionally, a test question has been added to reinforce this point. The ConCert standard operating procedure has been updated and has a section that addresses the AI chain of command.

(i) Recommended Action 9: Make AI functions a "collateral duty" to facilitate oversight and add AI functions to performance appraisals, awards, etc.

1. Response: FRCSW has added a specific critical element to the performance standards of Artisan Inspectors (developed by Quality Assurance) and ensures that the Quality Assurance Department participates in the evaluation of that critical element. Note: Inspection/verification duties do not meet the definition of "collateral duties" since they are grade controlling, permanent in nature, and regular and recurring.

(j) Recommended Action 10: Clarify whether AIs or QASs will continue to conduct AI training.

1. Response: The 4855 has been updated to include a statement that only QASs are allowed to do on the job training.

(2) Allegation 2: That FRCSW management failed to suitably train AI trainees to perform AI functions.

(a) Recommended Action 11: FRCSW should continue to comply with the training requirements set forth in the NAMP and FRCSW Quality Manual.

1. Response: FRCSW has continued to comply.

(b) Recommended Action 12: AI trainees should complete Conflict Resolution Training before receiving their AI stamp. Some form of Conflict Resolution refresher training should be conducted annually. Extend the training to all personnel involved in the performance of work subject to evaluation for conformance with standards, whether they are artisans, AIs, QASs, Production or Quality Department Supervisors or Managers.

1. Response: QA, TFM and Training are investigating quarterly vender conducted Conflict Resolution training that would be available to all employees. Vender has been identified. Some AIs would still get their stamp before receiving Conflict Resolution training, but the wait time would be greatly reduced.

(c) Recommended Action 13: Use the ConCert Classroom Training Course, including the written evaluation, as an opportunity to remove from the program those trainees whose verbal and written communication skills are inadequate to allow them to function effectively as AIs.

1. Response: Current AI PDs require an employee to earn and maintain their AI stamp as a condition of employment; if they do not earn the AI stamp or it is revoked, they shall be removed from the program, which will result in a demotion/downgrade in pay. Current HR mechanisms are already in place to allow for this course of action.

(d) Recommended Action 14: Revise and expand the written test given at the end of classroom training; 14

questions are insufficient to adequately evaluate whether the AI has absorbed the information presented in this segment of AI training. Ensure the written tests are completed individually and not as a group exercise.

1. Response: The written test has been updated to include 25 narrative and multiple choice questions. The passing score for the test is 85%. All tests are completed independently with no group tests. QA Branch Manager or QA Division Head are present during the test.

(e) Recommended Action 15: Revise the current JQR to more accurately reflect specific job skill sets required for specific work area or trade, i.e. Center Barrel line, Canopy Shop, Fabrication, sheet metal, mechanical, electrical, etc. to avoid marking sections N/A, lining out and changing titles by hand, or leaving blank items in the AI trainee's JQR because an item does not apply.

1. Response: JQR has been reviewed to identify product line specific requirements and corrections / updates are complete.

(f) Recommended Action 16: Discipline anyone found to have engaged in falsification of a JQR. Accuracy, integrity and candor are at the heart of any quality assurance program; gun decking or pencil whipping cannot be tolerated.

1. Response: FRCSW concurred.

(g) Recommended Action 17: Provide AI refresher training periodically, or at least every four years, to compliance with NAMP section 7.2.4.3.7, which states: "Refresher training will be provided to certified individuals every 4 years and whenever the review of quality data reveals adverse trends."

1. Response: Developing an AI refresher module. Training shall be conducted every four years in conjunction with Certification refresher training all stamp holders take.

(h) Recommended Action 18: Determine whether the QAS or the AI will conduct the classroom and OJT portions of AI training. Justify any decision to shift training to the AI, or modify the FRCSW Quality Manual to reflect only a QAS may perform these functions.

1. Response: The 4855 has been updated to include a statement that only QASs are allowed to do OJT.

(3) Allegation 3: That FRCSW E-2/C-2 AI-1 verified mechanical work when he was only certified to verify electrical work, in violation of the Appendix 7-D, paragraph 5.d, subparagraph 3 of the FRCSW Quality Manual [4]. [4] As noted previously, the Quality Manual is FRCSWINST 4855.1, dated 10 Jan 2010. This version includes specific information on the Concert Program.

(a) Recommended Action 19: Processes must be put in place to ensure that verifications are conducted accurately and completely per specifications and only on operations, tasks, or functions that Artisan Inspectors are qualified and certified to perform.

1. Response: QA is conducting random post AI inspection sampling and records results via QAWB. The Assistant ConCert Program Manager conducts weekly meetings to review all random samplings and records in the QAWB. Results have found all processes and records have been in compliance.

2. Actions complete - A complete revision to FRCSWINST 4855.1A, dated 13 Sept. 2012 has been released to address this very issue. The AI surveillance program has been modified to specifically monitor for this issue, as noted in discussion of Allegation 4 and 5 of Ref. (a), and procedures for final review of all work order workbooks have been updated so as to require final review and sign off by a QAS.

(b) Recommended Action 20: FRCSW Management should take appropriate action to hold FRCSW E-2/C-2 AI-1 accountable for verifying mechanical work when he was only certified to verify electrical work.

1. Response: FRCSW E-2/C-2 AI-1 was counseled regarding the trade specific AI verifications. In addition he was counseled by the Senior E2C2 QAS that further infractions of this nature would lead to his stamp being removed. This was considered an isolated event and did not warrant more severe action.

(4) Allegation 4: That FRCSW F/A-18 AI-2 verified machinist work when he was only certified to verify sheet metal work, in violation of Appendix 7-D, paragraph 5.d, subparagraph 3 of the FRCSW Quality Manual.

(a) Recommended Action 21: Tailor classroom training to ensure that discussions of work aspects that do not apply to all AIs include only those AI trainees that will perform the work being discussed. If this is not possible, emphasize during training that even though the trainer may be covering all trades during the discussions or demonstrations, each AI is only authorized to verify the trades listed in the AI designation letter the CO gives to that AI.

1. Response: FRCSWINST 4855.1A was updated and released Sept. 2012 with increased emphasis on in-trade AI verifications. Increased emphasis & clarity regarding AI verification authority was added to the classroom training. In addition, the requirement was reinforced during OJT. The QA Dept consolidated various ConCert SOPs into a single FRCSW instruction, FRCSWINST 4855.3 that further refines AI authority.

(5) Allegation 5: That on March 21, 2011, FRCSW E-2/C-2 AI-1 certified the aircraft operation work order maintenance book for an aircraft that was returned to squadron custody on March 15, 2011, in violation of the Chapter 4, Paragraph 4, section e.7 of the FRCSW Quality Manual.

(a) Recommended Action 22: That FRCSW Management takes appropriate action against FRCSW E-2/C-2 AI-1y for certifying completed work performed on an aircraft after it had been returned to squadron custody.

1. Response: FRCSW E-2/C-2 AI-1 received counseling regarding the incidents at Pt. Mugu. Additionally, numerous Production & QA personnel received counseling from QA and Production leadership regarding this event. QA had already issued a Quality Correction Notice to investigate and document root cause and corrective actions in Pt. Mugu. The Quality Officer and Production Officer along with the E2C2 QASs have followed up with visits to Pt. Mugu to ensure the certification/verification process is being executed by the book. In this case, FRCSW E-2/C-2 AI-1 was conducting the final review of the workbook, which is specifically no longer permitted. Previously it was not specifically prohibited and was in some cases being done by AI's.

2. From Para. 297. "...FRCSW has changed the process to ensure that all work order maintenance books are certified and that the work order maintenance books will be closed out prior to aircraft being returned to the fleet".

(6) Allegation 6: That, before moving the Type I verification function from the Quality Department to the Production Department, FRCSW did not perform an operational risk management analysis conforming to the criteria set forth in OPNAVINST 3500.39C, Operational Risk Management.

(a) Recommended Action 23: That FRCSW Quality Department be given authority and responsibility for AI hiring, firing, performance (including metrics for evaluating), and award decisions.

1. Response: The Quality Assurance Department will write and/or review the inspection/verification content of the PD, and continue to participate in the selection process as panel members of all Artisan Inspectors. FRCSW will add a specific critical element to the performance standards of Artisan Inspectors (developed by QA and HR) and ensure that the Quality Assurance Department participates in the evaluation of that critical element.

(b) Recommended Action 24: That FRCSW Production Department Supervisor responsibility and accountability for the quality of the work of the artisans under them be made more clear and specific, and be included as a separate element in their performance evaluations so as to reduce the risk created by moving the responsibility for Type I verifications from the Quality Department to the Production Department.

1. Response: AIs are fully trained on the existence and use of their QA chain of command when functioning as an AI. All programs with ConCort maintain an Area QAS that provides near constant presence on the shop floor for AI support. All AI's are initially informed and constantly reminded that they have open door access to the Chief Quality Officer. They also regularly exercise the Local ConCort Council as a means to elevate issues to the Commanding Officer. QA has added a section to the CONCERT SOP regarding AI chain of command while performing QA functions and specific issue reporting procedures, which will include recording issues in eCAMS.

(c) Recommended Action 25: That FRCSW establish formal mechanisms an AI may use to obtain assistance from Quality Department personnel in the event the AI perceives Production Department personnel: are not providing sufficient time or resources necessary for the AI to conduct a verification process; are pressuring the AI to accept non-conforming work; are pressuring the AI to stamp work as verified when the AI has

not conducted the verification, or to insert a date for the conduct of the verification other than the date it was actually performed. That FRCSW discipline Production personnel found to have interfered with the AI verification process.

1. Response: AIs are fully trained on the existence and use of their QA chain of command when functioning as an AI. All programs with ConCert maintain an Area QAS that provides near constant presence on the shop floor for AI support. All AI's are initially informed and constantly reminded that they have open door access to the Chief Quality Officer. They also regularly exercise the Local ConCert Council as a means to elevate issues to the Commanding Officer. QA has added a section to the CONCERT SOP regarding AI chain of command while performing QA functions and specific issue reporting procedures, which will include recording issues in eCAMS.

(d) Recommended Action 26: That FRCSW conduct a formal operational risk management analysis for the ConCert Program that conforms to the principles found in OPNAV Instruction 3500.39C.

1. Response: An Operational Risk Analysis was conducted by the Commander Naval Air Systems Command Safety Director and completed on 9 October 2013.

(e) Recommended Action 27: That FRCSW complete the annual OPNAV 3502/3 ORM Program Assessment Sheet for the ConCert Program, as required by OPNAV Instruction 3500.39C.

1. Response: Following the completion of the Operational Risk Analysis, FRCSW completed the annual OPNAV 3502/3 Assessments on 14 Nov 2013.

(f) Recommended Action 28: That, as part of the risk analysis effort, FRCSW create a baseline for metrics to be used to analyze how well the ConCert Program is functioning.

1. Response: QA has developed metrics for risk mitigation efforts identified in Recommendation 26 actions.

(g) Recommended Action 29: That FRCSW creates measurable standards to measure the effectiveness of the ConCert Program.

1. QA tracks AIDRs to determine delivered quality to our fleet customers and tracks the AI vs. QAS DWO

generation rate to ensure rates stay within acceptable standards.

(7) Allegation 7: That ConCert increases the risk to safety of flight and consequently poses a substantial and specific danger to public safety.

(a) Recommended Action 30: Since the ongoing NAVAUDSVC audit focuses only on the E-2/C-2 program, NAVINSGEN will add Aviation Depot Level Maintenance to the annual Opportunities and Risk Assessment Analysis that it and NAVAUDSVC prepare for senior Navy leadership to consider and will recommend that NAVINSGEN and/or NAVAUDSVC conduct an inspection, audit, or similar review of the program in 2013 that will extend to, at a minimum, the F/A-18 product line.

1. Response: Not Applicable

(b) Recommended Action 31: We also recommend the conduct of an independent third party audit of FRCSW that focuses on ConCert by an organization such as the Performance Review Institute, NQA-USA, or perhaps even one of the DCMA offices that monitors the work of Boeing or NGC. An audit by an outside organization would enable FRCSW to benefit from a review by personnel who review similar work that is performed in the private sector, and to obtain industry recognition of the quality of the FRCSW programs by submitting to the auditing processes used to measure the effectiveness of others who perform similar work in the aviation industry.

1. Response: Contacted the CO AIMO DCMA St. Augustine. He is evaluating the potential of conducting this audit. They currently oversight the Boeing MSE program and should understand the concept of ConCert and be able to provide a robust review. If performed, they will provide a Quality System assessment based on AS9100 Standards.