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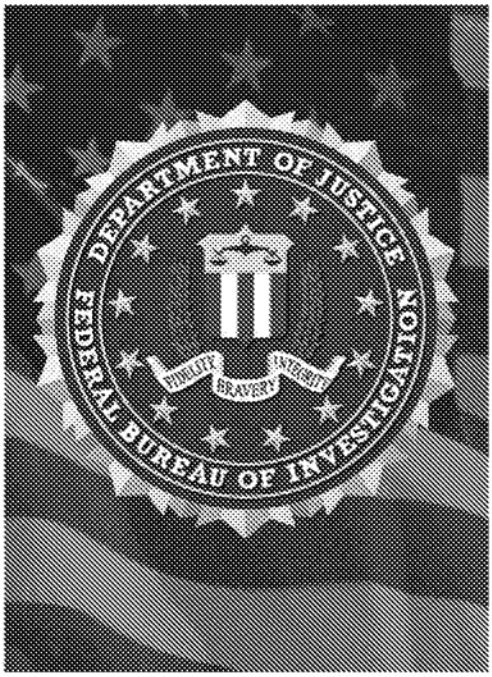
Mandatory Training and Tracking Policy Guide



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Approvals

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General Information

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Supersession Information

This document supersedes the *Mandatory Training and Tracking Policy Directive and Policy Guide*, 0724DPG.

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Revision Log

The revision log documents substantive changes made to the previous version of this policy, the *Mandatory Training and Tracking Policy Directive and Policy Guide*, published on September 2, 2014. The numbers and titles in the "Revised" column refer to the subsections as they currently appear in this updated policy. "Deleted" subsection numbers refer to those in the previous published version of the policy.

Revised Section Number and Title	Deleted Section Number and Title
Combined policy directive (0724D) with the policy guide (0724PG).	

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1. Introduction

Training is critical to the Federal Bureau of Investigation's (FBI) ability to meet its mission. Training is essential to FBI personnel compliance because it ensures that FBI personnel are both aware of, and have the skills necessary to meet, their responsibilities and obligations. Mandated training is a way to ensure the welfare and safety of all FBI personnel and the public.

1.1. Purpose

The purpose of this policy guide (PG) is to establish a process for authorizing and tracking mandated training within the FBI.

1.2. Scope

This PG applies to all training mandates for all FBI personnel, or subsets thereof, either by external or internal authorities. This PG does not apply to optional training, even if offered to all FBI employees or personnel.

1.3. Exemptions

There are no exemptions to this policy.

2. Roles and Responsibilities

2.1. Assistant Director (AD), Training Division (TD)

The AD, TD must:

- Oversee compliance with this policy.
- Review and approve or deny all requests to mandate training. The AD, TD may delegate this authority to no lower than the section chief (SC) level. The delegation must be documented in Sentinel file [redacted] b7E

2.2. Mandatory Training Program (MTP), Training Division

The MTP, TD must:

- Receive all requests to mandate training and track them appropriately.
- Analyze each request to determine whether the proposed training solution conforms to the citation and ensures that the training solution and required audience meet, and do not exceed, the citation (see Appendix B for definitions).
- Determine the mandate category, as defined in subsection 4.1.
- Notify the requester of TD AD's decision regarding the mandate request and discuss any potential corrective actions, if needed.
- Engage with sponsoring divisions to identify the target audience for execution of the training solution supporting the mandate. This includes verifying the appropriate length and timing of the mandate to meet mandate requirements and prepare delivery schedules.
- Oversee and ensure the training mandate lifecycle is maintained and adhered to in order to execute mandates in a systematic, effective, and efficient manner.
- Ensure that mandated Web-based training (WBT) courses are executed in the Virtual Academy (VA).
- Ensure that all approved mandatory trainings are added to the published Mandatory Training Listing available on the Mandatory Training Intranet site.
- Ensure that course post-execution records are serialized in Sentinel (file [redacted] [redacted] for official documentation. b7E

2.3. Learning Systems Unit (LSU), Training Division

LSU, TD must:

- Manage audience assignments in VA, including the creation of managed groups (see Appendix B for definitions).
- Execute mandates per the MTP, as applicable.

2.4. Assistant Director of the Sponsoring Division

The AD, or designee, of the sponsoring division must:

- Review all plans to implement training requirements mandated by authorities external to the FBI that impact his or her division and all requests to mandate training requirements originating within his or her division.
- Ensure that compliance is tracked for each approved mandate.
- Determine the funds required and secure funding through FBI's budget process for new and lifecycle development of mandated courses annually, for the duration of the mandate.
- Designate a program manager to be responsible for compliance with the requirements set forth in this policy.

2.5. Program Manager for the Sponsoring Division

The program manager of the sponsoring division must:

- Complete and submit the "Mandatory Training Request and Compliance Plan Form" (MTRCPF) for any training mandated by the division and obtain approval from his or her division's AD.
- Collaborate with TD after the approval of the request (regarding, but not limited to, managed groups, audience identification, citation review, and course testing).
- Track mandate compliance via VA.
- Identify and communicate compliance issues to the sponsoring AD and the MTP, as well as offer problem-solving recommendations.
- Notify TD when training requirements are determined to be optional or are eliminated.
- Ensure yearly review of course content to determine whether it is valid and current.

2.6. Managers and Supervisors

Managers and supervisors have the authority to mandate training to their subordinates; these courses are not managed and do not require approval through the MTP. Compliance tracking is the responsibility of the mandating FBI manager and supervisor. To mandate training to their subordinates, managers and supervisors should refer to the VA job aid titled, "Mandate Training."

Managers and supervisors also may exempt their subordinates from mandatory training for a specific and limited set of reasons. Exemptions are valid only when granted through VA and must be granted when the mandated assignments are active. For detailed guidance, see the VA job aid titled, "Exempt an Employee from Mandatory Training."

3. Policy Statement

TD is the managing authority ensuring that proper procedures are followed with regard to FBI Headquarters (FBIHQ)-approved training mandated for FBI personnel, or subsets or categories of FBI personnel.

Training may be mandated by authorities internally (e.g., FBI policies, Office of Integrity and Compliance (OIC) red teams, FBI programs, and so on) or entities external to the FBI (e.g., executive orders [EOs], the Department of Justice [DOJ], statutes, and so on).

4. Processes and Procedures

4.1. Validating Mandate Authority

The MTP is responsible for receiving, analyzing, and obtaining TD approval for all requests to mandate training across the FBI. Prior to TD approval, sponsoring divisions must be prepared to submit information to fulfill the below procedural components. At the time of receipt of a request to mandate training, the MTP will provide detailed mandatory training process instructions to the requesting sponsoring division.

To obtain the necessary approvals to mandate a training solution, the (internal/external) citation verbiage must support the request. Prior to training solutions being authorized and incorporated into FBI policies, OIC red team mitigation plans, program-specific directives, and any other authoritative plans to institute internally driven mandates must be coordinated with TD.

Each mandate is categorized into a tier:

- **Tier 1 – External:** statutory, regulatory, or DOJ.
- **Tier 2 – Internal:** FBI policy, OIC red team mitigation plan, program-specific requirement affecting employees across the FBI.
- **Tier 3 – Career and Skill Development:** required for primary duty knowledge and skills development. May pertain to the position itself or intradivision program requirements.
- **Tier 4 – Collateral Duty:** required for assumed responsibilities other than the primary duty and may result in an internal certification.

4.2. Mandate Sponsorship

A sponsoring division must be identified for each mandated training solution. If the subject matter of the training pertains to areas, programs, or operations of two or more divisions, the divisions must jointly determine which will act as the sponsoring division. The MTP will assist in facilitating dialogue between divisions.

4.3. Mandate Approvals

All requests for mandatory training must be submitted using the online MTRCPF and approved by the AD of the sponsoring division and the AD, TD.

To approve a plan to mandate a training solution, TD will review the following factors:

- The proposed training solution satisfies the internal or external citation that mandates the training.
- Existing or newly developed training will satisfy the mandate citation.
- The mandated target audience meets, and does not exceed, the referenced citation.
- The training solution meets, and does not exceed, the timeframe, length, depth, and scope of the referenced citation.

In addition, all tier 1 WBTs, unless otherwise dictated by the citation, must adhere to the 30-minute time limit. If a waiver is requested, both the sponsoring division AD and the TD AD must approve it via electronic communication (EC) using file number [redacted] b7E

For all tier 1 WBTs, a test-out is required unless the training has a frequency designation of "One Time Only" or the citation prohibits its use. (The test-out is optional for tier 2-4 WBT courses.)

For tier 1 WBTs following the fiscal year (FY) launch cycle, course content updates must be received by TD no later than July 31. If no updates are required or received, the existing courses in VA will be re-mandated.

For tier 1 WBTs following a calendar year (CY) launch cycle, sponsors will be contacted regarding necessary updates.

4.4. Renewals of Mandates

For mandates that have a recurring requirement, the sponsoring division and the MTP must review and validate the mandate approval on an annual basis. Initial approvals will remain on record until a change is made to any component of the approval (e.g., the audience, frequency, or length).

4.5. Training Solution Development

The sponsoring division must contact the MTP regarding mandated training analysis and design and development plans for initial and lifecycle development. If applicable, the appropriate TD unit will contact and consult with the sponsor regarding the sponsor's development needs. TD can assist with estimating funding costs; however, the sponsoring division is responsible for identifying and acquiring the necessary funds for initial and lifecycle development.

4.6. Mandated Training Execution

The MTP will coordinate with the sponsoring division to confirm audience details, the execution schedule and deadline, and points of contact (POC). Once audience details are confirmed, MTP coordinates training execution with LSU.

4.7. Mandatory Training Reporting

VA is the official centralized recordkeeping system for all FBI employee training records. Sponsoring divisions are responsible for their mandatory training compliance tracking and reporting.

4.8. Compliance Reviews

At the end of each FY, the MTP issues a list of mandated trainings to each sponsoring division. Within 30 days of receiving the list from the MTP, each sponsoring division must conduct a compliance review for each listed training and report the results via an EC to the MTP using file number [redacted] The following must be included in each review report: b7E

- **Name:** State the training solution title.
- **Citation reference:** The citation language must be reviewed to determine whether changes were made within the review cycle. If changes were made, they must be reported on the MTRCPF.
- **Affected audience:** If the audience changes, the change must be identified and reported.

- **Content review:** All training solution content, including applicable assessment and evaluation data, must be reviewed to ensure that the training solution materials remain current and accurate. The outcome of the review must be reported.
- **MTRCPF review:** The MTRCPF must be reviewed and modified to reflect any changes that were made within the review cycle.

4.9. Awareness Site

A citation may require an organization to only have information related to a particular topic readily available for personnel to review, with no formal training and tracking required. At times, citations may be modified, changing the mandate from formal training and transforming it to an awareness solution. For more information, see the Training Awareness Intranet site.

5. Authorities

- Title 5 United States Code (U.S.C) Sections (§§) 4101–4121, or Chapter 41, Government Employees Training Act (GETA)
- 5 U.S.C. § 4103, Establishment of Training Programs
- 5 U.S.C. § 4118, Training Regulations
- Title 41 Code of Federal Regulations (CFR) § 410.301, Establishing and Implementing Training Programs
- PD 0812D, *Training Division Statement of Authorities and Responsibilities*

6. Recordkeeping Requirements

The MTP must, at a minimum, serialize the following ECs in Sentinel (file [redacted] for official documentation: b7E

- Mandatory training execution summary EC, containing the following:
  1) TD AD approval summary
  2) Mandate citation
  3) MTRCPF
  4) Fact sheet
- End-of-year compliance review results EC
- Mandatory training removals

Documents must be retained according to the Records Management Division's (RMD) requirements.

Appendix A: References

- TD Intranet site
- Mandatory Training Intranet site
- Training Awareness Intranet site
- Virtual Academy Intranet site
- Virtual Academy job aids
- PD 0812D, *Training Division Statement of Authorities and Responsibilities*

Appendix B: Definitions and Acronyms

Definitions

Audience: a predetermined group of individuals identified to complete particular mandated training. This group is based upon the authoritative documentation referred to by the sponsor of the mandated training.

Citation: the act of quoting authoritative documentation dictating topic-specific training requirements. Common examples of documents of authority include, but are not limited to, statutes, policies, regulations, and (EOs). Citations must strongly support the sponsor's mandatory training request.

Course: a prescribed series of lessons focused on a particular subject.

External authorities: authorities outside the FBI, such as the DOJ, the Director of National Intelligence (DNI), the Office of Personnel Management (OPM), Congress, and the President.

FBI employees: individuals hired for and appointed to positions in the FBI, whether special agents (SAs) or professional staff.

FBI personnel: FBI employees and other individuals serving with the FBI, such as detailees; task force personnel from other federal, state, or local entities; contractors; and others serving in analogous capacities, whether temporarily or indefinitely.

Lifecycle management: a periodic review of training solution content and materials. The review cycle is determined at the completion of the training development phase.

Managed group: a list of individuals or specialty groups (unidentifiable by job title, series, and so on) created by the FBIHQ sponsor who are required to complete a mandatory training. The managed group resides in VA and is populated and updated by the FBIHQ sponsor or designee.

Program manager: an individual at FBIHQ in whom authority has been vested to develop, manage, and otherwise administer the day-to-day aspects of a program on an enterprise-wide basis, including the sponsorship and implementation of pertinent training for personnel involved in the program.

OIC red team: an OIC-led team sometimes formed to assess whether an identified potential compliance risk is an actual risk to the FBI and, if so, what steps will be taken to mitigate it.

Sponsoring division: the FBIHQ division with oversight and responsibility for the area, program, or operation of programs to which the subject matter of the training most closely pertains. The sponsoring divisions own the training mandates.

Subsets or categories of FBI personnel: groups of FBI personnel denoted by one or more characteristics for which a corresponding data element exists in the human resources personnel data system, such as job series, grade, employee type, division, cost code, and other characteristics.

Test out: to score high enough (based upon a predetermined percentage) on a test that one does not need to complete a particular course.

Training requirement: a training objective made mandatory or compulsory by an appropriate authority. Objectives may be stated in terms of hours, individual courses, or curricula, but must have a temporal element in order to qualify as a requirement.

Training solution: the final determination of how to fill a training gap. A training solution can fall anywhere on the training continuum.

Virtual Academy: the FBI's only authorized learning management system (LMS) for all FBI training and the official training course catalog, registration system, and recordkeeping system for official transcripts.

Acronyms

AD	assistant director
BPMS	Bureau Personnel Management System
CFR	Code of Federal Regulations
CY	calendar year
DNI	Director of National Intelligence
DOJ	Department of Justice
EC	electronic communication
EO	executive order
FBI	Federal Bureau of Investigation
FBIHQ	Federal Bureau of Investigation Headquarters
FY	fiscal year
GETA	Government Employees Training Act
LMS	learning management system
LSU	Learning Systems Unit
MTP	Mandatory Training Program
MTRCPF	Mandatory Training Request and Compliance Plan Form
OIC	Office of Integrity and Compliance

OPM	Office of Personnel Management
PD	policy directive
PG	policy guide
POC	point of contact
RMD	Records Management Division
SA	special agent
SC	section chief
TD	Training Division
U.S.C.	United States Code
VA	Virtual Academy
WBT	Web-based training