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## Return for Investment Revisited: Establishing the Practicality and Economic Utility of INS's Promotional Assessment System

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Good Afternoon. My name is Ilene Gast. I would like to acknowledge my colleague, Paul Valdivia, who worked with me on this project. He was unable to be here today.

Today, I will be describing what we at the Immigration and Naturalization Service have been doing to assess the effectiveness of our Competency-Based Promotional Assessment System.

# Return for Investment

- External Mandate
  - » Include a return for investment study for all major R&D initiatives
  
- Internal Mandate
  - » Prove “value added”

My group, the Research and Development Division, was established in September of 1995 to manage entry-level and promotional assessments.

The Commissioner and Assistant Commissioner wanted evidence that their decision to invest in personnel assessment was paying off. They requested that all major R&D initiatives should include a return for investment study.

We were asked to begin with demonstrating the return for investment of the Competency-based Promotional Assessment System.

In this era of outsourcing and cutbacks, we were anxious to prove our worth by demonstrating that a well-run assessment program adds value to the organization.

# Assessing the Return on INS' Investment

- The Program: Competency-Based Promotional Assessments for INS Managers and Supervisors
- The Return for Investment Model
  - » A generic guide for R&D initiatives
- The Protocol for the Promotional Assessments
  - » The evaluation plan
- The Results
  - » Costs
  - » Utility
  - » Non-Monetary Returns

Last year, I described our generic Return for Investment Model, and the plan we prepared to apply this model to the Promotional Assessment system.

Today I will explain how we applied the model to estimate the costs of the new program and its expected utility. I will also be talking about what we did to determine whether the program is meeting the needs INS, the Border Patrol management and the individual Border Patrol Agents.

I would like to begin with a very brief overview of the Competency-Based Promotional Assessment System that we developed for the US. Border Patrol

# Competency-Based Promotional Assessments

- **Commissioner's Objective**
  - » Improve professionalism in the INS
- **Program Objective:**
  - » Improve managerial and supervisory performance through objective assessment
    - Assess job-related competencies
    - Identify top-quality candidates
    - Provide objective scores
    - Provide developmental feedback

The Commissioner has been concerned with the level of service that INS provides. We are addressing her concern by implementing a new selection system that will improve the quality of those in supervisory and management ranks.

Under the old system, when a vacancy arose, applicants submitted their written qualification statements. Their application materials were rated and ranked by a panel of individuals at the same or higher grade. This system was seen as unfair and ineffective. After an individual was selected for a supervisory or managerial job, the "losers" would acquire the "winning" KSA's by submitting a Freedom of Information Act Request. Candidates would then submit a personalized version of that write-up the next time a similar job was advertised.

In addition, unless they were selected, candidates rarely received feedback on how well they had done. A fair number of Freedom of Information Act requests dealt with were filed by individuals who had submitted applications for jobs and who had received no feedback.

The new system was designed to be more objective. All assessments measure important job-related competencies. Three of the four assessments are scored by computer. In addition, candidates receive timely feedback on their performance. We send them their scores as well as competency-based feedback and suggestions for self-development.

# Competency-Based Promotional Assessments

## *Assessment Strategy*

<i>Competency Area</i>	<i>Decision Making</i>	<i>In-Basket</i>	<i>Writing</i>	<i>Past Achievement Record</i>
Thinking Skills	X			
Administrative Skills		X		
Writing Skills			X	
Personal Attributes				X
Technical Skills				X

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We assess five competency areas using four different assessments.

On the **Past Achievement Record**, participants describe their optimal achievements in a number of job-related competencies including technical skills and personal attributes such as flexibility, leadership. Participants complete the Past Achievement Record before being scheduled for a series of multiple choice tests.

The **Decision Making Situational Assessment** addresses important thinking skills of reasoning, decision making, and problem solving. candidates evaluate information that they would be expected to encounter frequently in the job.

We also administer a **multiple-choice in-basket** which simulates the administrative portion of job. It addresses administrative skills such as planning and evaluating, managing and organizing information, and self-management

Finally, the **Managerial Writing Skills** exercise determines whether participants have the writing skills required in the job.

We test 3 times a year with make-up sessions in between. Candidates first complete the Past Achievement Record and are then scheduled for a 1/2 day examination session during which they compete the multiple choice assessments. Managerial components complete all 4 tests. Supervisory candidates do not complete the in-basket

# Competency-Based Promotional Assessments

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## *Candidate Feedback*

- Scores
  - » Overall standing
  - » Competency scores
- Developmental Resource Guide
  - » Self-improvement tips
  - » Recommended readings

Once candidates have completed the assessment, they receive a summary sheet showing their overall performance and their scores for each of the five competency areas.

We also enclose a developmental resource guide which includes self development tips and recommended readings.

# Competency-Based Promotional Assessments

## *Status Report*

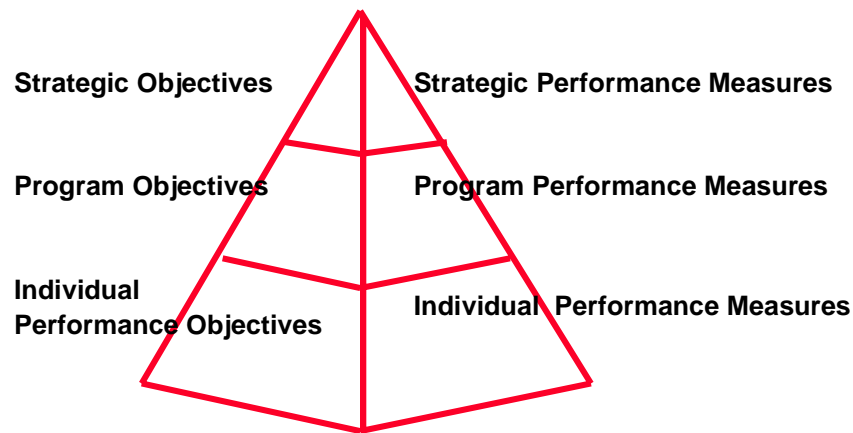
- Supervisory Border Patrol Agent
  - » **Assessment development:** Complete
  - » **Implementation:** Ongoing
  
- INS Supervisory Immigration Officer
  - » **Assessment development:** Complete
  - » **Scheduled implementation:** FY99

The assessments are operational in the Border Patrol. As of the middle of this month, we had assessed over 3,000 candidates and filled 360 vacancies.

We have developed a second set of assessments for the remaining INS Law Enforcement occupations and are scheduled to implement them in January 1999.

# Model Scope

## *Levels of Information*



I'd now like to turn to the Return for Investment Studies. We could have simply done a utility analysis. However, we decided to view the implementation of this new system more broadly. Changing the promotional system is an organizational change.

For this reason, we wanted our model to include a variety of information that would help us monitor and evaluate this change. We wanted to include information about individual performance, but we also wanted information about how the program was working, and about how it was affecting INS.

# Return for Investment Model

## *Investment*

- **Costs**
  - » Basic Research and Design
  - » Development
  - » Implementation
  - » Administration
  - » Evaluation

## *Return for Investment*

- **Monetary Returns**
  - » Utility
  - » Organizational Economies
- **Non-Monetary Returns**
  - » to Direct Customers
  - » to Indirect Customers

The resulting model includes the costs of developing, running, and evaluating the system.

It also looks at what we expect to get back from the new system.

Utility is only part of the monetary return. We also included "Organizational Economies" --or --cost savings that could be derived from implementing the new system. If the system is working properly, we might expect cost savings, such as a reduction in time spent handling complaints or grievances, or in dealing with Freedom of Information Act Requests.

We also wanted to determine how our direct customers viewed the new system. Were the candidates satisfied with the new assessments and the feedback reports? Were selecting officials satisfied with the individuals whose names were being submitted for vacancies?

The model also addresses whether the new program affects indirect customers. These would include the subordinates of those hired through the new system, people who receive service from INS, and individuals and groups who monitor INS activities. (e.g., the media and Congress.)

# The Study

## Return for Investment Protocol for Competency-Based Promotional Assessments for Border Patrol



I would now like to turn to what we have done thus far to assess our return for investment. I will describing the cost analysis we did, how it entered into a utility analysis, and how we used qualitative data to make our final decisions.

# Investment Costs

Investment Costs	FTE	Travel	Resources	Total
Basic Research and Design	\$ 86,1000	\$ 5,000	\$ 3,700	\$ 94,800
Annualized Cost	\$ 17,220	\$ 1,000	\$ 740	\$ 18,960

- **Costed Project Activities: Basic Research and Design**

- » Review of the literature and best practices
- » Job analysis
- » Development of assessment strategy

- **Assumptions**

- » Amortization period = 5 years
- » 1 FTE valued at GS-14-5; 1996 \$; 21% benefits

First, we looked at the costs for laying the groundwork for this program. This included our review of the literature and best practices, our job analysis, and the development of our assessment plan.

Our costs include an initial site visit, printing and mailing the job analysis and the associated staff costs.

Throughout this analysis, we estimated the staff costs at GS-14, step 5, with 21% benefits. This is the average cost of a member of our project team. We also adjusted staff costs for adjusted for the year in which the work was done.

We decided that our groundwork will probably last for about five years. so we used 5 years as our amortization period. Note that we have annualized all of our costs. This will become important later on.

# Investment Costs

Investment Costs	FTE	Travel	Resources	Total
Development Costs	\$ 344,400	\$ 10,000	\$ 2,400	\$ 356,800
Annualized Cost	\$ 172,200	\$ 5,000	\$ 1,200	\$ 178,400

- **Costed Project Activities: Development**

- » Assessments
- » Candidate materials
- » Candidate feedback and referral system

- **Assumptions**

- » Amortization period = 2 years
- » 4 FTE valued at GS-14-5; 1996 \$; 21% benefits

A more substantial cost was developing all the materials, systems, and procedures required by the new system.

We've included staff costs, more site visits, and software we needed to design our database.

# Investment Costs

Investment Costs	FTE	Travel	Resources	Total
Administration Costs	\$ 23,200	\$ 10,000	\$ 500	\$ 33,700

- **Costed Project Activities: Project Administration**

- » Management briefings
- » Policy development
- » Project management and oversight

- **Assumptions**

- » Annualized cost
- » Actual costs of Project Manager (.25 FTE) and Division Director (.10 FTE) 1997/8 \$; 21% benefits

We also included the cost of project management and oversight. Here we included the actual salaries and benefits of those who were involved. Coincidentally the average benefits figure came out the same as the group average.

# Investment Costs

Investment Costs	FTE	Travel	Resources	Total
<b>Implementation Costs</b>	\$ 448,700	\$ 20,000	\$ 571,000	\$ 1,039,700
<b>Annualized Cost</b>	\$ 224,350	\$ 10,000	\$ 285,500	\$ 519,850

- **Costed Project Activities: Implementation**

- » Application dissemination, screening, and processing
- » Assessment administration and scoring
- » Dissemination of results to candidates
- » Referral list processing

- **Assumptions**

- » Amortization period = 2 years for recurring expenses  
= 5 years for one-time costs
- » 2.5 FTE valued at GS-14-5; 1997/8 \$; 21% benefits

By far, the greatest cost is operating the system. Staff costs are reflected both in the FTE column and in the Resources column. We have a contract with the Office of Personnel Management to administer the assessments. We keep the test administrators busy. Testing seems to be continual. We have three main administrations in January, June and September with make-up sessions at selected sites.

We also keep our own staff busy. Corresponding to these test administrations are mailings of feedback reports. There are a continuous stream of vacancy announcements for which we must process referral lists. In addition, we score the Past Achievement Record in-house. And of course there are the trips to the field to make sure that everything is working, and the occasional trip to Europe to administer an examination.

# Investment Costs

Investment Costs	FTE	Travel	Resources	Total
Evaluation Costs	\$ 66,400	\$ 10,000	\$ 2,700	\$ 79,100
Annualized Cost	\$ 33,200	\$ 5,000	\$ 1,350	\$ 39,550

- **Costed Project Activities: Evaluation**

- » Survey design, analysis, and reporting
- » Utility estimation and documentation
- » Cost-benefit analysis

- **Assumptions**

- » Amortization period = 2 years
- » .75 FTE valued at GS-14-5, 1997 \$; 21% benefits

By contrast, the costs of evaluation are much smaller. On the one hand, we were warned by the Executive Associate Commissioner for Management not to spend too much on the evaluation.

On the other hand, we have to be careful to make sure that we are committing the time and resources to the evaluation. So often, my work on the evaluation work has been overtaken by the demands of operational work.

## Investment Costs

<b>Cost Category</b>	<b>Annualized Cost</b>
Basic Research and Design	\$ 18,960
Development	\$ 178,400
Project Administration	\$ 33,700
Implementation	\$ 519,850
Evaluation	\$ 39,550
<b>Total Costs</b>	<b>\$ 790,460</b>

Here is the bottom line. It costs nearly eight hundred thousand dollars to operate the program for a year.

# Cost Analysis

	<u>T&amp;E</u>		<u>PROM</u>
	Supervisors	Managers	
<b>Cost per Applicant</b>	\$ 172	\$ 532	\$ 284
<b>Cost per Vacancy</b>	\$ 1,597	\$ 5,810	\$ 2,744
<b>Subtotal</b>	\$ 356,052	\$ 377,626	
<b>Cost per Year</b>	\$ 733,781		\$ 790,460

Cost figures based on annualized estimates: 288 vacancies (223 supervisory, 65 managerial) and 2781 applicants (2073 supervisory, 708 managerial)

Our next step was to compare the Competency-Based Promotional Assessment Program to the existing system.

We worked with staff from the Human Resources Office and the Finance offices to estimate of the cost of filling a vacancy under the old system . The estimate includes the salary cost of 3 panel members, and any travel costs they might incur. It also includes the salary of the personnel staff who set up and manage the pane.

Note that costs are much higher for managers. Supervisory panels can be formed locally. GS-11's and 12's are fairly plentiful in all but the smallest Border Patrol Sectors. Travel is relatively rare.

However, panels for the higher graded managers typically involve travel and include the salaries of GS-13's,14's, and 15's.

The conclusion that one could draw from looking at this data alone is that the pre-existing selection system was more cost-effective.

However, the cost data only provides a partial view of the picture.

## Return for Investment Utility Analysis

- Meta-analyzes Used as Validity Estimates

<b>Assessment</b>	<b>Validity Estimate</b>	
	<u>Mean r</u>	<u>Corrected r*</u>
Past Achievement Record	.25	.32
Decision Making	.30	.39
Managerial Writing	.45	.58
Job Simulation	.40	.52

\* r corrected for criterion unreliability only

A utility analysis provides a more complete view of how the two systems compare, because it takes the effectiveness of each mode of selection into account.

But in order to do a utility analysis one must have a validity coefficient. We pursued a content validation strategy when we developed the assessments. We will not have the data to complete a criterion-related study for a while. So we substituted meta-analyzed validities. The validities on the table resulted from an extensive review of the literature.

We estimated the Validity of the Past Achievement Record using McDaniel, Schmidt, and Hunter (1988) estimate for the Behavioral Consistency Approach.

For Decision Making and Managerial Writing we used a study by Trattner (1988), which included the validities of cognitive ability tests and verbal ability tests for selecting managers.

The In-Basket validity estimate comes from a 1996 study by Doverspike.

These references are included on the last page of your hand out.

## Return for Investment Utility Analysis

- Formed Weighted Composite (R) for each Battery
  - » Estimated validity of managerial battery  
 $R = 30 \text{ DM} + 20 \text{ PAR} + 30 \text{ IB} + 20 \text{ MW} = .50 (.64)^*$
  - » Estimated validity of supervisory battery  
 $R = 50 \text{ DM} + 30 \text{ PAR} + \text{MW} = .43 (.56)$
- Estimated Validity of Existing T&E System  
 $r = .106 (.11)$

\*Corrected validities in parentheses

The next step was to calculate a battery score for the supervisory and managerial batteries. We needed two scores, one for the supervisors and one for the managers because supervisory candidates do not complete the in-basket.

Using on the meta-analyzed validity estimates, the actual intercorrelations of our assessments, and a formula in Ghiselli, Campbell, and Zedec's 1981 book, we were able to estimate the validity of these batteries.

Because we wanted our utility analysis to compare the two systems we also needed an estimate of the validity of the existing system. To estimate the validity of the existing system, we used another meta-analysis by McDaniel, Schmidt, and Hunter.

## Return for Investment Utility Analysis

$$\Delta U = [TN_s (r_1 - r_2) SD_y \bar{z}] - [N_s (C_1 - C_2) / p]$$

- $\Delta U$  = the gain in productivity in dollars over one year
- T = tenure in years of the average selectee
- $N_s$  = number selected per year
- $r_1$  = validity of the PROM selection battery
- $r_2$  = validity of the existing selection procedure
- $SD_y$  = the dollar value of performance
- $\bar{z}$  = the mean score of those who were selected
- $C_1$  = per applicant cost of the PROM selection battery
- $C_2$  = per applicant cost of the existing selection procedure
- p = the selection ratio

Utility analysis shows the payoff of using a valid test for one year. Typically, comparisons are made against random selection. The analysis considers the expected tenure of the new hires, the expected gain in productivity which is expressed in dollars, the test validity, and tempers this by the percent of people you hire, and how well they actually do on the test.

The equation we used is a little more complicated than ones you may be accustomed to. It comes from an analysis done by Schmidt, Mack, & Hunter on Park Police.

We did not have random selection and wanted this to be reflected in our analysis. This is reflected in the left side of the equation.

We also wanted the relative costs of the two systems to be reflected in the analysis. Note the right side of the equation.

## Return for Investment Utility Analysis

$$\Delta U = [TN_s (r_1 - r_2) SD_y \bar{z}] - [N_s (C_1 - C_2) / p]$$

T = 5 years

$N_s$  = 223 supervisors; 65 managers

$r_1$  = .56 for supervisors; .64 for managers

$r_2$  = .11

$SD_y$  = 40 % of salary or \$37,028 for supervisors; \$42,037 for managers

$\bar{z}$  = .66 for supervisors; .61 for managers

$C_1$  = \$284 per applicant

$C_2$  = \$172 for supervisors; \$532 for managers

$p$  = .10

These are the values we used. A tenure analysis we did two years ago suggests that once individuals are promoted into the supervisory ranks they remain with the Border Patrol at least 5 years.

Our annualized selection rate is 223 supervisors and 64 managers per year. We have had approximately 10 applicants for each vacancy.

The validities are from our meta-analysis. The costs are from our cost analysis.

We estimated ,  $SD_y$ , the dollar value of performance, at 40% of salary based on the body of work done by Schmidt and Hunter.

## Return for Investment Utility Analysis

Tenure	Supervisors (N = 223)		Managers (N = 65)	
	1 year	5 years	1 years	5 years
<b>Overall Utility</b>	\$2,402,449	\$12,012,247	\$1,044,587	\$4,578,133
<b>Utility per Selectee</b>	\$ 10,773	\$53,867	\$16,071	\$ 70,433

Remember that the cost of using the pre-existing system for selecting supervisors was considerably less than the cost of using the new system. However when you add the effectiveness of the new system into the equation, there is a considerable payoff for supervisory selection. This payoff is further compounded because of the large number of supervisors now being selected.

The payoff becomes most meaningful when you think about the increased value per selectee--the average supervisor makes about \$86,000 per year when you include benefits; the average manager makes about \$105,000. Think about the gain in terms of getting an extra six weeks worth of productivity out of each supervisor per year, or nearly two months of productivity for managers.

# Non-Monetary Returns

## *Returns to Customers*

- How Satisfied Are They?
  - » Candidates (Candidate Satisfaction Survey)
    - Satisfaction with process
    - Satisfaction with assessments
    - Satisfaction with developmental feedback
  - » INS Management (Site Visits)
    - Satisfaction with candidates
    - Satisfaction with procedures

I would now like to turn to the qualitative component of the study. It is no less important. If our clients do not like a testing program it will be relegated to the shelf. As assessment professionals it is in our best interest to find out what is working well and what we can do to improve the system.

This is critically important. So often a new program is developed and not used because of organizational considerations. And if the selection program is not implemented, any gains in utility will evaporate.

This year we were only able to assess the perceptions of our direct customers. We did this in two ways--through a mail out survey and through site visits.

## Returns to Customers

- The Candidate Survey

- » Mailed to everyone who had been assessed as of 8/97 (N=1353)
- » 475 responded, 383 provided written comments

- The Site Visits

- » Multiple trips to the Southwest Border
  - McAllen, TX to San Diego, CA
- » Met privately with top Border Patrol management
- » Held “town meetings” for any agents who wanted to attend

We had done a preliminary exit survey. We handed out questionnaires after people had completed the assessments. Our return rate was about 11%. These folks seemed reasonably happy. However, we had received feedback from the Chief Patrol Agents, who are the senior managers in the Border Patrol, that the program was causing a number of problems. We, therefore, followed up with a more detailed mail-out survey.

In addition, we visited the field. In a series of 6 trips, we visited multiple sites along the southwest border including McAllen, San Antonio TX (Del Rio, Laredo), El Paso TX (El Paso, Marfa), Dallas TX, Tucson, AZ, Albuquerque NM--Commissioners conference and San-Diego CA

We spoke to the managers individually and to the agents in groups.

Our survey results paralleled what we learned through our site visits.

## Returns to Customers

- Mixed Results - The Good
  - + Candidates are satisfied with test administration
  - + People who did well viewed the tests favorably
  - + Managers are generally satisfied with quality of candidates for positions

I will begin with the GOOD NEWS.

As we learned in the exit surveys, candidates were satisfied with the nuts and bolts of test administration (e.g., the scheduling, the test site, the timing of tests) and the professionalism of the test administration staff.

Not surprisingly, those who did well, viewed the tests favorably. Also, not surprisingly, higher graded individuals tended to do better than lower graded ones.

Selecting Officials were generally satisfied with the quality of the referrals. They were also satisfied with the turn-around time on vacancies.

Now for the not so good news.

# Returns to Customers

- Mixed Results - The Not So Good

- ? Not sure whether the new system is more fair
- The Past Achievement Record inadequately portrays breadth and depth of experience
- Candidates want the feedback report to include more detail on specific needs for improvement
- Managers are not satisfied with the quantity of candidates for positions; 3 referrals are not enough

The at the time of the survey, the jury was still out on the issue of fairness. People had not had ample opportunity to see the system work. They also lacked information about how it would work. So, we got a fair number of “undecided” responses to this issue. Subsequent feedback suggests that Candidates need for information was greatly helped by our town meetings.

The flip side of high-scorers liking the test, those who did not do well described it in less than flattering terms. Many individuals had been out of school for a while and felt uncomfortable with the paper and pencil format. The Past Achievement Record was seen as an inadequate representation of their experience and knowledge. Many felt that it was impossible to capture a lifetime of experience in one incident. In addition, they indicated the PAR did not adequately address job knowledge. They wanted a more direct assessment of job knowledge was needed because they saw it as essential to effective supervisory performance.

Candidates also wanted more detailed feedback about their performance.

Although managers were happy about the quality of the candidates, they were unhappy about the quantity. They had been used to getting 8-12 names. Three names did not provide them with the discretion that they were used to.

They wanted to be able to temper their selections with information about specific experiences and past performance.

# Returns to Customers

- Refinements to the Process
  - » Selecting officials now receive 12 referrals
  - » The Past Achievement Record is being replaced with the Job Experience Measure
  - » Diagnostic feedback is being expanded
  - » A job knowledge test will be administered to all candidates for supervisory positions

As a result of the feedback we've made several changes to the system. We are forwarding more names. Managers are happier.

We are providing more detailed information about test performance and we will be releasing the tests when they are retired next year.

We are also adding a job knowledge test at the request of Border Patrol management.

We are also replacing the Past Achievement Record with an objectively scored measure of experience. The new Job Experience Measure gives credit for specific jobs, details and collateral assignments. It assesses job knowledge indirectly through past experience. But most importantly, It has the blessing of the top management of the Border Patrol.

We have learned an important lesson. Although its expected validity is of the new JEM a little lower than that of the Behavioral Consistency approach used by the PAR (.28 compared to .32 corrected), we suspect that we could have lost the whole program if we had not changed this element.

# Future Plans

## *Returns to Customers*

- **Indirect Customers -The INS Workforce**
  - » Organizational Survey - planning in progress
    - Perceptions of professionalism
    - Perceptions of supervisory and managerial effectiveness
  
- **The Media**
  - » Monitoring news clips, requests (5/98)
    - Requests for information, appearances
    - Articles about the new system
    - Articles about the professionalism of Border Patrol managers

We have not made as much progress as I had hoped in measuring organizational variables. I have been working with another part of the organization on the Organizational Climate Survey, but things are progressing slowly.

I have recently begun monitoring news clips. While this is extremely interesting, I have thus far been unable to discern any patterns attributable to our assessments.

# Future Plans

## *Monetary Returns*

- Expand Data Collection: Organizational Economies
  - » Compare pre- and post-implementation costs
    - Applicant screening and certification
    - Freedom of Information Act requests
    - Complaints against managers
    - Grievances and appeals

Similarly we have not yet inroads into the assessing the affects of our system on other organizational systems.

We are taking our Management's advice seriously. There are organizational variables that would be interesting to examine, but we must carefully consider our resources and the resources of people in other programs. For example, despite initial agreement with the FOIA staff in Dallas, the backlog of FOIA requests in INS may prevent us from doing anything for a while.

There is a growing body of research on techniques for tying selection programs to organizational goals. We are investigating that carefully.

# Future Plans

## *Monetary Returns*

- Refine cost and validity information
- Criterion-related validity study

Our future plans include refining our validity and cost estimates. I am in the process of updating the meta-analyses that I used for the estimates I reported.

In addition, my list of subjects for a criterion related validity study continues to grow.

# Return for Investment Model

## *Investment*

- **Costs**
  - » Basic Research and Design
  - » Development
  - » Implementation
  - » Administration
  - » Evaluation

## *Return for Investment*

- **Monetary Returns**
  - » Utility
  - » Organizational Economies
- **Non-Monetary Returns**
  - » to Direct Customers
  - » to Indirect Customers

I've describe our efforts to evaluate the INS investment in a new assessment procedure. I've estimated the costs and the utility of the new assessment system. I've also described the results of our qualitative evaluation and the resulting changes. We expect that these changes will keep the program alive for the foreseeable future.

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