



Memorandum from the Office of the Inspector General

December 13, 2022

Tina R. Wallace

REQUEST FOR FINAL ACTION – AUDIT 2022-17348 – EMPLOYEE RELOCATION ALLOWANCES

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding audits that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Robert L. Dixon, Senior Auditor, at (865) 633-7396 or Rick C. Underwood, Director, Financial and Operational Audits, at (423) 785-4824. We appreciate the courtesy and cooperation received from your staff during the audit.

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)

RLD:KDS

Attachment

cc (Attachment):

TVA Board of Directors
Megan Andersen
Susan E. Collins
Buddy Eller
Megan T. Flynn
David B. Fountain
Joseph Galardi
Jim R. Hopson
Jeffrey J. Lyash
Jill M. Matthews
Ben R. Wagner
Wilson Taylor III
OIG File No. 2022-17348



Office of the Inspector General

Audit Report

To the Vice President,
Total Rewards and
Strategic Performance

EMPLOYEE RELOCATION ALLOWANCES

Audit Team
Robert L. Dixon
Michael A. Driver

Audit 2022-17348
December 13, 2022

ABBREVIATIONS

FTR	Federal Travel Regulation
MEA	Miscellaneous Expense Allowance
MGS	Manager and Specialist
OE	Officer and Executive
SIRVA	SIRVA Relocation, LLC
SPP	Standard Programs and Processes
TLA	Temporary Living Allowance
TQSE	Temporary Quarters Subsistence Expenses
TR	Total Rewards
TVA	Tennessee Valley Authority
TVA Board	TVA Board of Directors
VP	Vice President

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DAVID P. WHEELER



Audit 2022-17348 – Employee Relocation Allowances

EXECUTIVE SUMMARY

Why the OIG Did This Audit

The Tennessee Valley Authority (TVA) may reimburse moving and associated travel expenses for employees who accept another TVA position that requires they relocate, or to new appointees as determined by management. We included an audit of TVA's employee relocation allowances on our annual audit plan due to the potential reputational and financial risks associated with relocations that do not comply with TVA policies and procedures.

Our audit objective was to determine if relocation allowances are paid in accordance with TVA Standard Programs and Processes (SPP) 11.208, *Employee Relocation Allowances*. Our audit scope included 308 completed employee relocations during calendar years 2019 through 2021, totaling approximately \$8.4 million. TVA utilizes a third-party vendor, SIRVA Relocation, LLC, (SIRVA) to interface with the employee and administer the relocation. SIRVA is required to administer each relocation in accordance with TVA's policies, and TVA retains authority for review and approval of any requested policy exceptions.

What the OIG Found

We found employee relocations were generally paid in accordance with TVA-SPP-11.208 and the management review control for payment of these transactions was operating effectively. However, we identified an opportunity to improve the relocation process and instances where program guidance could be clarified. Specifically, we found (1) SIRVA's review of miscellaneous expense allowance claims was not documented consistently, (2) program guidance for some employee relocations could be improved, (3) program guidance for manager and specialist new hires is unclear, and (4) program guidance for temporary living allowances incorrectly references the Federal Travel Regulation.

What the OIG Recommends

We made four recommendations to TVA management, including one to improve the relocation process and three to update TVA-SPP-11.208.

TVA Management's Comments

In response to our draft report, TVA management agreed with our recommendations and provided actions planned. See Appendix D for TVA management's complete response.

BACKGROUND

The Tennessee Valley Authority (TVA) may reimburse moving and associated travel expenses for employees who accept another TVA position that requires they relocate, or to new appointees as determined by management. We included an audit of TVA's employee relocation allowances on our annual audit plan due to the potential reputational and financial risks associated with relocations that do not comply with TVA policies and procedures.

Applicable Policies and Regulations

TVA Standard Programs and Processes (SPP) 11.208, *Employee Relocation Allowances*, covers conditions and requirements for payment of employee relocation allowances. Allowances are determined by the relocation program being offered, with benefits generally provided under separate relocation policies referenced in TVA-SPP-11.208. The relocation policies include:

- Non-Management New Employee – Applicable to TVA new hires with a Salary Policy Annual pay group or Trades and Labor Annual pay group, which comprises those employees represented by a labor union.
- Standard Renter – Applicable to internal TVA transferees of all classifications, as well as TVA new hires within the Manager and Specialist (MGS) pay group. Employees relocated under this policy rent their residence at the time they are selected for hire or transfer.
- Standard or Full Homeowner – Applicable to internal TVA transferees of all classifications, as well as TVA new hires within the MGS pay group. Employees relocated under these policies own their residence at the time they are selected for hire or transfer. Additional allowances, such as a guaranteed purchase offer, equity advance, and home sale incentive bonus, are included under the full homeowner policy. TVA Total Rewards (TR) personnel informed us that TVA prefers the full homeowner policy be offered to employees at the vice president (VP) level and above.

According to TR personnel, offer letters for TVA management employees in Officer and Executive (OE) pay grade positions may include language stating that TVA will pay for “actual and reasonable” relocation costs. Relocation benefits offered in these cases are exempt from certain policy limitations, such as time limits and household goods weight limits.

TVA-SPP-11.208 states that it incorporates Federal Travel Regulation (FTR) guidance deemed applicable to TVA. Chapter 302 of the FTR provides guidance for employee relocations, including for both new appointees and transferred employees. Under FTR guidelines, transferring employees are entitled to certain relocation benefits that are not available to new hires, such as home sale and/or purchase assistance.

Relocation Requirements

According to TVA-SPP-11.208, travel and transportation expenses and applicable allowances are payable provided they are incident to the change of official station and the transfer is in the interest of the government and is not primarily for the convenience or benefit of the employee or at the employee's request. Employees receiving relocation allowances must agree in writing to remain in the service of the government for twelve months following the effective date of appointment or transfer. A signed agreement on form TVA 20591 (non-management new employees) or TVA 20592 (all transfers and new management appointees) is required (see examples at Appendices B and C). The distance to a new official station generally must be 50 miles or more from the existing residence (new employees), or the new official station must be at least 50 miles further from the old residence than the old official station (transferring employees).

After a relocation and specific allowances are authorized, TVA utilizes a third-party vendor, SIRVA Relocation, LLC, (SIRVA) to interface with the employee and administer the relocation. SIRVA is required to administer each relocation in accordance with TVA's policies, and TVA retains authority for review and approval of any requested policy exceptions.

Internal Control

The primary control TVA relies upon to ensure relocations comply with policies and procedures is management review and approval of the relocation and specific allowances.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our audit objective was to determine if relocation allowances are paid in accordance with TVA-SPP-11.208. Our audit scope included completed employee relocations during calendar years 2019 through 2021. TVA initiated 437 employee relocations with effective dates during the period January 1, 2019, through December 31, 2021. Of these, 308 were placed in a "closed" status as of December 31, 2021, indicating that the relocation was completed. For the remaining relocations, 3 were canceled and 126 remained in the initiated status as of December 31, 2021. Summary information relating to the closed relocations is shown in Table 1 on the following page.

Closed Employee Relocations January 1, 2019 – December 31, 2021			
Relocation Policy	Number of Relocations	Total Relocation Amount	Average Relocation Amount
Standard Homeowner	159	\$5,680,279	\$35,725
Full Homeowner	14	1,209,499	86,393
Non-Management New Employee	72	843,352	11,713
Standard Renter	<u>63</u>	<u>716,271</u>	<u>11,369</u>
Totals	308	\$8,449,401	\$27,433

Table 1

A complete discussion of our audit objective, scope, and methodology is included in Appendix A.

FINDINGS AND RECOMMENDATIONS

We found employee relocations were generally paid in accordance with TVA-SPP-11.208 and the management review control for payment of these transactions was operating effectively. However, we identified an opportunity to improve the relocation process and instances where program guidance could be clarified.

SIRVA'S REVIEW OF MISCELLANEOUS EXPENSE ALLOWANCE CLAIMS WAS NOT DOCUMENTED CONSISTENTLY

A miscellaneous expense allowance (MEA) is provided to defray various costs associated with discontinuing residence at one location and establishing residence at a new location in connection with an approved permanent change of station. This allowance is equal to (1) the lesser of \$650 or one week's basic pay for an employee without immediate family or (2) the lesser of \$1,300 or two weeks' basic pay for an employee with immediate family. TVA-SPP-11.208 states that MEA claims must include the (1) date the former residence was discontinued, (2) complete address of permanent residence and date established, and (3) complete address for all locations of temporary quarters occupancy and dates occupied.

We selected a judgmental sample of 30 closed (i.e., completed) employee relocations, totaling \$2,151,047, from the population of 308 closed relocations, totaling \$8,449,401. We found 22 of 30 employees in this sample received the MEA. According to TVA personnel, TVA expects SIRVA to document their review of the required information related to the MEA claims prior to payment. We reviewed the related payment request forms for these transactions and noted 16 of 22, totaling \$20,800, had no documentation on the forms of SIRVA's review of the required information.

Clear documentation of review when processing these claims can help to decrease the risk that MEA will be paid to employees who have not met SPP requirements.

Recommendation – We recommend the VP, TR:

1. Require SIRVA to document their review of required information when authorizing payment of MEA claims.

TVA Management’s Comments – In response to our draft report, TVA management agreed with our recommendation and stated SIRVA will update their process for authorizing MEA claims to provide documentation of review. See Appendix D for TVA management’s complete response.

PROGRAM GUIDANCE FOR MANAGER AND SPECIALIST AND OFFICER AND EXECUTIVE EMPLOYEE RELOCATIONS COULD BE IMPROVED

TVA-SPP-11.208 states represented employees may receive one TVA-provided relocation for one voluntary transfer per job classification.¹ However, TVA-SPP-11.208 does not provide guidance for MGS or OE employees who undertake subsequent relocations during their career. TR personnel informed us TVA does not have any restrictions in regard to multiple relocations for nonrepresented employees. This lack of policy direction could lead to inconsistent application of relocation guidance across TVA in situations involving subsequent relocations for nonrepresented employees.

According to TR personnel, for employees in OE pay grade positions, offer letters may include language noting TVA will reimburse “actual and reasonable” costs associated with relocation. Neither TVA-SPP-11.208 nor the relocation policy documents include guidance on the administration of relocation benefits for employees in OE pay grade positions under these circumstances. This lack of policy direction reduces transparency and could lead to inconsistent application of relocation guidance in situations involving OE employees.

Recommendation – We recommend the VP, TR:

2. Update TVA-SPP-11.208 to include guidance for:
 - a. Evaluating and administering subsequent relocations for MGS and OE employees.

¹ According to TR personnel, represented employees may voluntarily apply for a posted TVA position that includes relocation allowances. If selected to fill the position, management would consider their relocation to be in TVA’s interest. The represented employee may receive relocation allowances under this process once during their career in their current job classification, and would not be eligible for any further relocation benefits in the future, unless they changed jobs or roles.

- b. Administering relocations for OE employees whose offer letters include language stating TVA will reimburse “actual and reasonable” costs associated with relocation.

TVA Management’s Comments – In response to our draft report, TVA management agreed with our recommendation and stated TR will update the SPP as deemed appropriate. See Appendix D for TVA management’s complete response.

PROGRAM GUIDANCE FOR MANAGER AND SPECIALIST NEW HIRES IS UNCLEAR

Guidance provided in TVA-SPP-11.208, sections 3.2.6.E and 3.2.6.H.8, states new appointees are not eligible for a travel allowance to seek residence quarters (house hunting trip) and other allowances for expenses incurred in connection with residence transactions. However, the Standard Homeowner, Full Homeowner, and Standard Renter policy documents contradict the SPP and state allowances for house hunting trips and residence transactions are available to MGS new hires.

TR personnel informed us the authority afforded management under the TVA Board of Directors (TVA Board) resolution 1243-29, as amended by the TVA Board resolution 1382-11, made exception for MGS new hire employees to receive each of these benefits. However, TVA-SPP-11.208 section 3.2.1.C.1 includes information relating to the authority provided to management under these TVA Board resolutions, but does not make specific reference to either house hunting trips or residence transactions.

Program policies with unclear or contradictory guidance increase the risk that (1) relocation allowances will be applied inconsistently, and/or (2) employees will receive benefits for which they are not eligible. In the instances discussed above, including additional information that more closely aligns the guidance in TVA-SPP-11.208 with the relocation policy documents would provide greater clarification and improved guidance to those charged with implementing the relocation process.

Recommendation – We recommend the VP, TR:

3. Update TVA-SPP-11.208 to clarify the relocation allowance benefits available to MGS new hires under the TVA Board resolution authority and align this guidance with relocation policy documents.

TVA Management’s Comments – In response to our draft report, TVA management agreed with our recommendation and stated TR will update the SPP as deemed appropriate. See Appendix D for TVA management’s complete response.

PROGRAM GUIDANCE FOR TEMPORARY LIVING ALLOWANCES INCORRECTLY REFERENCES FEDERAL TRAVEL REGULATION

The FTR in section 302-6.11 states temporary quarters subsistence expenses (TQSE) reimbursement may be provided using either the actual expense method or the lump sum expense method. TVA-SPP-11.208 states employees may, at TVA management's discretion, be offered a lump sum temporary living allowance (TLA). Further, TVA-SPP-11.208 states the allowance is for an initial 30 day period and requests may be submitted for extensions in "30-day increments and shall not exceed 120 total days as mandated by the FTR." However, the FTR in section 302-6.200 states, "The maximum number of days that may be used for the TQSE lump sum calculation is 30; no extensions are allowed under the lump sum payment method."

TR personnel informed us the TLA is a discretionary expense, and TVA chooses not to reimburse this allowance pursuant to the specific requirements of the FTR and instead under its own authority under the TVA Act. As TVA indicated that the authority for providing discretionary TLA benefits to relocating employees is provided under the TVA Act rather than the FTR, the current reference to the FTR in TVA-SPP-11.208 regarding the TLA is inconsistent and incorrectly states that TVA's TLA benefits are provided in accordance with FTR guidance.

Recommendation – We recommend the VP, TR:

4. Update TVA-SPP-11.208 to remove reference to the FTR relating to providing TLA benefits to relocating employees.

TVA Management's Comments – In response to our draft report, TVA management agreed with our recommendation and stated TR will update the SPP as deemed appropriate. See Appendix D for TVA management's complete response.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our audit objective was to determine if relocation allowances are paid in accordance with Tennessee Valley Authority (TVA) Standard Programs and Processes (SPP) 11.208, *Employee Relocation Allowances*. Our audit scope included completed employee relocations during calendar years 2019 through 2021. To achieve our objective, we:

- Reviewed TVA-SPP-11.208, relocation policy documents, applicable TVA Board of Directors resolutions, and other relevant program guidance to identify key requirements applicable to the administration of TVA’s employee relocation program.
- Reviewed Federal Travel Regulation (FTR) Chapter 302, *Relocation Allowances*, to obtain an understanding of key FTR requirements incorporated in TVA’s relocation program guidance.
- Interviewed TVA’s Total Rewards personnel to gain an overall understanding of the employee relocation program, including administrative roles and responsibilities.
- Obtained an understanding of internal controls associated with the employee relocation program. We identified management review and approval of employee relocations as the internal control significant to the audit objective. Our primary method for testing the operating effectiveness of this control was reviewing employee relocation transactions for compliance with applicable policies and procedures.
- Obtained a listing of employee relocations initiated during calendar years 2019 through 2021, and performed procedures to assess the reliability of the data.
- Selected a judgmental sample of 30 closed (i.e., completed) employee relocations, totaling \$2,151,047, from the population of 308 closed relocations, totaling \$8,449,401. Table 1 shows the allocation of relocations by the applicable relocation policy.

Closed Employee Relocations January 1, 2019 – December 31, 2021				
Relocation Policy	Number of Relocations	Total Relocation Amount	Number of Sample Items	Total Sample Amount
Standard Homeowner	159	\$5,680,279	10	\$865,017
Full Homeowner	14	1,209,499	10	1,012,611
Non-Management New Employee	72	843,352	5	128,220
Standard Renter	<u>63</u>	<u>716,271</u>	<u>5</u>	<u>145,199</u>
Totals	308	\$8,449,401	30	\$2,151,047

Table 1

We reviewed available supporting documentation for each relocation to determine (1) compliance with the requirements of TVA-SPP-11.208, relocation policy documents, and other relevant program guidance, and (2) whether the management review was operating effectively. Since this was a judgmental sample, the results of the sample cannot be projected to the population.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require 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 objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

**Tennessee Valley Authority
Relocation Travel Order Form
Non-Management - New Employees**

For Official Use Only:	
Travel Order No.:	File No.:
Transfer Acceptance Date:	

Benefits effective for 1 year from the effective date of transfer

Name	Employee ID No. (EIN)	Title	Alias/Short Code
	Department Code	Project	Task
	Pay Group <i>(Check appropriate pay group)</i> <input type="checkbox"/> SPA <input type="checkbox"/> TLA	Date Employee Reports to New Station <i>(Effective Date of Transfer)</i>	
New Organization, Official Station, and Address	Address <i>(Current Permanent)</i> <input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Mobile Home		
	E-mail Address:		
Telephone - TVA	Telephone - Home	Telephone- Cell	

Entitlements

- En-Route Mileage
- Transportation and temporary storage of household goods and personal effects *(18,000 lbs. maximum) -Choose Method below*

Actual Expense

- TVA arranges and pays for the transportation/storage of HHGs through TVA's third party vendor
 Employee arranges the transportation/storage of HHGs via a self move and is reimbursed by TVA for actual eligible expenses incurred

The following allowances may be authorized: *(Internal use only)*

- Per Diem - Employee Only *(Travel period must be greater than 12 hours)*
 Shipment of Personal Vehicle *(Limited to 2 vehicles)*
 Commercial Air *(Travel period must be greater than 250 miles)*
 Rental Car

Mileage: Distance between old residence and new official station must be at least 50 miles.

Agreement

I agree to remain in Government service for twelve months following the effective date of this transfer, unless separated for reasons beyond my control and acceptable to TVA. I understand that this agreement is required to make me eligible for the travel, transportation, and other moving expenses, including storage of household goods and personal effects, allowable under Federal law and TVA travel regulations. I further understand that in case of violation of this agreement, any moneys expended by the United States on account of travel and transportation expenses connected with this transfer will be recoverable from me as debt due the United States. I agree I have received adequate relocation counseling prior to accepting this offer.

I certify that vouchers submitted will contain an accurate description of official travel performed and request reimbursement under applicable travel regulation. I certify that neither my immediate family nor I have accepted, and will not accept, duplicate reimbursement for relocation expenses. To my knowledge, no third party has accepted duplicate reimbursement for my relocation expenses.

Employee's Signature

Date

The employee named above is authorized to travel and incur necessary expenses, as indicated, in accordance with TVA's travel policy and consistent with Federal Travel Regulations and other applicable Federal laws and regulations. It is my belief that travel by the indicated mode of transportation is the most advantageous available under the circumstances.

Approving Manager's Name (Print)

Approving Manager's Signature

Date

**Tennessee Valley Authority
Relocation Travel Order
All Transfers and New
Management Appointees**

For Official Use Only:	
Travel Order No.:	File No.:
Transfer Acceptance Date:	

This transfer is not primarily for the convenience or benefit of the employee or at the employee's request. Benefits effective for 1 year from the effective date of transfer

Name	Employee ID No. (EIN)	Title	Alias/Short Code
Department Code:	Project	Task:	
Old Organization, Official Station, and Address	Pay Group (Check appropriate pay group) <input type="checkbox"/> OE <input type="checkbox"/> MGS <input type="checkbox"/> SPA <input type="checkbox"/> TLA	Date Employee Reports to New Station (Effective Date of Transfer)	
New Organization, Official Station, and Address	Address (Current Permanent) <input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Mobile Home		
Email Address:			
Telephone - TVA	Telephone - Home	Telephone -	

Eligibility: New official station must be at least 50 miles further from old residence than old official station.

Compute mileage:

_____ Distance between old residence and new official station.	_____ Distance between old residence and old official station.	_____ Difference
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The following allowances are authorized for all transferred employees and new management appointees within the 50 states and the District of Columbia.

Entitlements

- Transportation and subsistence allowance for employee and immediate family while en-route.
- Purchase and/or sale of residence transactions, or unexpired lease in lieu of sale of residence.
- Miscellaneous expense allowance.
- Transportation and temporary storage of household goods and personal effects (18,000 lbs. Max.). -Choose Method below
Actual Expense
 TVA arranges and pays for the transportation/storage of HHGs through TVA's third party vendor
 Employee arranges the transportation/storage of HHGs via a self move and is reimbursed by TVA for actual eligible expenses incurred
- Transportation of a mobile home for use as a residence (in lieu of transportation/storage of household goods).

The following allowances may be authorized: (Internal Use Only)

- House hunting trip – number of days authorized.
- Temporary living allowance (lump sum) – days authorized.
- Separate Reporting
- Rental Car
- Commercial Air (Travel period must be greater than 250 miles)
- Shipment of personal vehicle (Limited to 2 vehicles)
- Property Management Services

Members of immediate family - must also relocate

Name	Relationship	Children's Ages



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1401

December 5, 2022

David P. Wheeler
Assistant Inspector General

RESPONSE TO REQUEST FOR COMMENTS – DRAFT AUDIT 2022-17348 – EMPLOYEE
RELOCATION ALLOWANCES

This letter is in response to your November 3, 2022, request for comments regarding the subject draft report.

TVA takes very seriously its commitment to be good stewards of the resources we are given. As such, TVA appreciates the Office of Inspector General identifying areas where we can improve our processes and procedures. We are committed to a culture of continuous improvement at TVA and welcome this opportunity.

TVA's planned actions will be coordinated with our relocation vendor, SIRVA Relocation, LLC, as part of TVA's review and alignment of the Standard Programs and Processes (SPP) 11.208, *Employee Relocation and Allowances* and relocation documents. We have concluded from our review of the recommendations that there are opportunities for improvement in the following areas:

- Consistency in documentation by TVA's third-party relocation vendor (SIRVA) related to miscellaneous expenses
- Enhancements to program guidance and alignment with TVA-SPP-11.208

We would like to thank you, Robert L. Dixon and Michael A. Driver for the professionalism and cooperation in conducting this audit. If you have any questions, please contact me at (423) 827-9257.

A handwritten signature in cursive script that reads "Tina Wallace".

Tina Wallace
Vice President, Total Rewards and Strategic Performance
Human Resources and Communications

cc: Attachment

Megan Anderson
Susan E. Collins
Megan T. Flynn
David B. Fountain

Joseph Galardi
Wilson Taylor III
OIG File No. 2022-17348

Attachment
Response to Request for
Comments Draft Audit 2022-17348
Employee Relocation Allowances

OIG RECOMMENDATION	TVA MANAGEMENT RESPONSE
Require SIRVA to document their review of required information when authorizing payment of Miscellaneous Expense Amount claims	TVA agrees with the recommendation. SIRVA will update their process for authorizing Miscellaneous Expense Allowance claims to provide documentation of review for all Miscellaneous Expense Allowance claims.
Update SPP to include guidance for: <ul style="list-style-type: none"> Evaluating and administering subsequent relocations for Manager and Specialist (MGS) and Officer and Executive (OE) employees Administering relocations for OE employees whose offer letters include language stating TVA will reimburse actual and reasonable costs associated with relocation 	TVA agrees with the recommendation and will update SPP as deemed appropriate.
Update SPP to clarify the relocation allowance benefits available to MGS new hires under Board resolution authority and align this guidance with relocation policy documents	TVA agrees with the recommendation and will update SPP as deemed appropriate.
Update SPP to remove reference to the Federal Travel Regulations related to providing Temporary Living Allowance benefits to relocating employees	TVA agrees with the recommendation and will update the SPP as deemed appropriate