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Highlights

Objective

U.S. Postal Service employees may be eligible to receive relocation benefits as a result of a transfer to a new duty station, as a new hire, or for a final move after retirement.

The Postal Service outsources all relocation services to a relocation management firm (RMF). The RMF provides guidance to relocating employees on Postal Service policies and processes, ensures prompt payment of authorized expenses, and assists with arrangements for moving and storing household goods. On September 19, 2018, the Postal Service entered into a contract with the current RMF to manage its relocation program beginning February 1, 2019. Based on data from February 1, 2019, through May 12, 2020, this program authorized over 800 employee relocations and paid over \$21 million in relocation benefits.

> September 19, 2018, RELOCATION the Postal Service entered into a contract
>
> MANAGEMENT with the current **FIRM**

Based on data from February 1, 2019 through May 12, 2020, this program authorized over

Employee Relocations





Our objectives were to determine whether relocation benefits were reasonable and properly paid, the current RMF complied with contractual requirements, and the Postal Service effectively managed the relocation benefits program.

Our audit was in the fieldwork stage when the President of the U.S. issued the national emergency declaration concerning the novel coronavirus disease outbreak (COVID-19) on March 13, 2020. The results of this audit do not reflect any process and/or operational changes that may have occurred as a result of the pandemic.

Findings

The RMF did not always comply with contractual requirements and properly pay all relocation benefits. In addition, the Postal Service did not effectively manage the program. We identified instances of noncompliance with contractual requirements for full, unlimited database access and payments of certain relocation benefits. Specifically:

- The RMF did not provide the Postal Service full, unlimited access to all documentation in its online database. A majority of employee relocation benefits documentation and information supporting those benefits paid were viewable only by the RMF. The contract states the RMF must provide full, unlimited access to the online database. Only upon our request did the RMF provide hard copy documentation or make the documentation viewable. The Postal Service needs access to the RMF's online database to effectively monitor the program and ensure proper payment of benefits.
- The RMF did not properly pay relocation benefits for 24 of 151 (16 percent) randomly sampled employee relocations from February 1, 2019, through March 9, 2020. We found 27 instances in which the RMF did not pay relocation benefits expenses according to policy or verbal guidance received from the Postal Service. Specifically, the RMF:
 - Reimbursed employees for en route travel lodging expenses up to the government lodging rate but did not reimburse applicable taxes in 10 of the 27 instances.

- Miscalculated amounts due for the meals and incidentals component of per diem expenses in 13 of the 27 instances based on incorrect values, number of travelers, and government per diem amounts.
- Reimbursed a travel lodging expense based on the government allowance rate for the lodging location instead of the new duty station.
- Reimbursed a travel expense not related to the employee's relocation.
- Miscalculated a mileage expense allowance.
- Omitted a reimbursable, invoiced cost for a household goods moving expense.

These issues occurred because the Postal Service did not have adequate policies and procedures to monitor the program. In addition, the Postal Service discussed guidelines regarding the application of relocation policy with the RMF but did not document them. Access to all RMF data and processes for monitoring RMF performance would ensure proper payment of relocation benefits and RMF compliance with contractual requirements. The Postal Service agreed with the miscalculations and, as a result of our audit, agreed to correct the improper payments.

We also found the Postal Service has opportunities to reduce costs for its relocation benefits program by aligning its relocation policy with the Federal Travel Regulation (FTR). Postal Service payment policies are significantly different than FTR payment policies for miscellaneous expense allowance and temporary quarters benefits. Specifically:

- Postal Service relocation policy allows a miscellaneous expense allowance payment of \$2,500 for non-bargaining employees regardless of marital or family status and two weeks of base pay for managers in postal career executive service. The FTR's maximum miscellaneous expense allowance payment is \$1,300. If management followed FTR policies, they would have saved over \$1 million from February 1, 2019, through May 12, 2020.
- The Postal Service does not require receipts for payment of the temporary quarters lump sum benefit or demand repayment if the employee does not use the entire amount when relocating. The FTR requires receipts or a travel voucher and states that reimbursement may be based on actual expenses, up to government per diem rates. The FTR ensures payments closely match actual expenses.

Recommendations

We recommended management:

- 1. Establish full, unlimited access to the relocation management firm's database.
- 2. Implement processes and procedures to monitor contractual and policy requirements.
- 3. Develop written guidelines to clarify verbal relocation policy discussions with the relocation management firm.
- 4. Evaluate and align relocation benefits policy for miscellaneous expense allowance and temporary quarters benefits with those benefits offered to other federal employees.

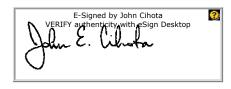
Transmittal Letter



September 30, 2020

MEMORANDUM FOR: CARA M. GREENE

VICE PRESIDENT, CONTROLLER



FROM: John E. Cihota

Deputy Assistant Inspector General

for Finance and Pricing

SUBJECT: Draft Audit Report – Relocation Benefits Program

(Report Number 20-126-R20)

This report presents the results of our audit of the Postal Service's Relocation Benefits Program.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Lorie Nelson, Director, Finance, or me at 703-248-2100.

Attachment

cc: Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the U.S. Postal Service's Relocation Benefits Program (Project Number 20-126). Our objectives were to determine whether relocation benefits were reasonable and properly paid, the current relocation management firm (RMF) complied with contractual requirements, and the Postal Service effectively managed the relocation benefits program. See Appendix A for additional information.

Background

Postal Service employees and new hires relocate to and from areas within and outside the U.S., District of Columbia, Puerto Rico, and the U.S. Virgin Islands. Employees may be authorized to relocate when transferring to a new duty station, 1 as a new hire, or for a final move2 (generally after retirement). Relocation benefits enable relocating employees to physically move to a new principal residence and assume their new responsibilities as quickly as possible by offsetting additional housing expenses for a short period.

"Relocation benefits
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The Postal Service outsources all relocation services to the RMF to ensure employees receive uniform information on authorized relocation benefits. The RMF provides guidance to relocating employees on Postal Service policy and processes, ensures prompt payment of reimbursable expenses, and assists with arrangements for moving and storing household goods. The RMF funds all expenses related to the contract up front on behalf of the Postal Service and the Postal Service reimburses the RMF according to the schedule and terms of the contract.

On September 19, 2018, the Postal Service entered into a contract³ with to manage its relocation program, beginning February 1, 2019. The Postal Service incorporated the following relocation policy handbooks into the contract: F-15-A for executive and administrative schedule employees;⁴ F-15-B for postal career executive service employees, including retirees;⁵ and F-15-C for bargaining employees.⁶

The RMF provides weekly reports⁷ to the Postal Service and the two parties meet monthly to discuss the current home inventory and marketing strategies. In addition, the RMF and the Postal Service meet quarterly to review the RMF's activities and relocation statistics.

Table 1 shows the number of employees authorized to relocate and relocation benefits paid by the current RMF.⁸

¹ Location where an employee regularly reports for work.

² Executive retirees and their surviving spouses.

³ The contract is an indefinite delivery, indefinite quantity contract which provides for an indefinite quantity of services for a fixed time. The contract has an initial four-year base period of performance of February 1, 2019, through January 31, 2023.

⁴ Relocation Policy - Nonbargaining Executive and Administrative Schedule, Management and Technical Pay Band, and Attorney Compensation System Employees, dated April 2013.

⁵ Relocation Policy - Postal Career Executive Service Level I Employees, dated October 2012.

Relocation Policy – Bargaining Employees, dated January 2016.

⁷ The weekly reports provide updates on the real estate inventory that results from home purchases executed between the RMF and employees, to facilitate the employees' relocations.

The number of employees and benefits paid reflects services provided by the current RMF for relocations initiated from February 1, 2019, through May 12, 2020, excluding U.S. Postal Service Office of Inspector General (OIG) employees.

Table 1. Number of Employees Authorized Relocation Benefits and Relocation Expenses Paid by Current RMF

Payment Period	Number of Employees Authorized for Relocation Benefits	Total Relocation Benefits Expenses Paid ⁹
Feb. 2019 - Sept. 2019	445	\$8,787,739
Oct. 2019 - May 2020	361	\$12,395,729

Source: RMF employee relocation data.

Finding #1: Relocation Benefits Program

The RMF did not always comply with contractual requirements and properly pay all relocation benefits. Specifically:

- The RMF did not provide the Postal Service full, unlimited access to all documentation in its database, as required by the contract.¹⁰
- The RMF did not properly pay relocation benefits for en route travel,¹¹ advance round trip travel,¹² and household goods transportation for 24 of 151 (16 percent) randomly sampled employees from February 1, 2019, through March 9, 2020. These errors ranged from about \$5 to \$1,676.

In addition, the Postal Service did not effectively manage the relocation benefits program. These instances occurred because the Postal Service did not have adequate policies and procedures to monitor the program. The Postal Service's engagement in the relocation process ends once the RMF accepts the relocation authorization. Further, the Postal Service established guidelines regarding application of the relocation policy through discussions with the RMF but did not document those guidelines. The absence of written guidelines contributed to the RMF's miscalculations.

Access to all RMF data and enhanced processes for evaluating the RMF's performance would allow the Postal Service to ensure proper payment of relocation benefits and the RMF's compliance with contractual requirements. According to the Postal Service's internal guidance, 13 independent and regular evaluations of performance provide confidence that a contractor's work is satisfactory. In addition, the evaluations help ensure the effectiveness of the processes and the identification of risks. 14

"Access to all RMF data and enhanced processes for evaluating the RMF's performance would allow the Postal Service to ensure proper payment of relocation benefits and the RMF's compliance with contractual requirements."

Contract Requirements

The Postal Service did not have full, unlimited access to all documentation in the RMF's online database, as required by the contract. We found much of the documentation for employee relocation benefits was viewable only by the RMF. According to the contract, the RMF must provide the Postal Service with full, unlimited access to the online database.

During our initial review of the database, we found the Postal Service did not have access to documentation and information that supported benefits paid for temporary quarters, advance round trip travel, en route travel, movement and storage of household goods, and costs associated with home sales. In addition, the Postal Service could not access dependent information. In most employee relocation files, the only documents initially viewable were the repayment agreement and client authorization.

⁹ Benefits are paid over a period that extends to two years after authorization and may include payments to authorized employees outside the payment period.

¹⁰ Contract Number 2BTSSV-19-B-0149 between the Postal Service and with a base period of February 1, 2019, through January 31, 2023.

¹¹ Occurs when the employee and/or his family leave their old residence to report to the new duty station.

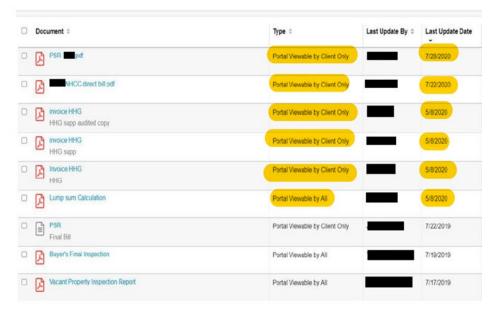
¹² Travel time to the new duty station for the purpose of seeking a new residence. To receive this benefit, the employee must make this trip prior to reporting for work at the new duty station.

¹³ Supplying Principles and Practices, revised June 20, 2020, represent the strategic elements that guide Postal Service buying and material management activities.

¹⁴ Practice Number 5, Manage and Measure Supply, Manage Delivery and Contract Performance.

Upon our request, the RMF provided hard copy supporting documentation or made the documentation viewable for the benefits reviewed to assist us in determining whether relocation benefits were properly paid, as shown in Figure 1. Except for access to dependent information that the RMF made available systemwide (not shown), the RMF made supporting documentation for benefits viewable only upon request.¹⁵

Figure 1. Example of Employee Document Screen¹⁶



Source: RMF database

Benefit Payments

The RMF did not properly pay relocation expenses for 24 of 151 (16 percent) randomly sampled employee relocations from February 1, 2019, through March 9, 2020. Therefore, we estimate that, for 87 employees from the population of

545 employee relocations, relocation expenses totaling \$2,341,039, were likely at risk for error.¹⁷

Among the 24 employee relocations with errors, we found 27 instances in which relocation benefits expenses were not properly paid. Specifically, the RMF:

"We found 27 instances in which relocation benefits expenses were not properly paid."

- Reimbursed employees for en route travel lodging expenses up to the government lodging rate but did not reimburse applicable taxes in 10 of the 27 instances. ¹⁸ Following a miscommunication between the Postal Service and the RMF in the summer of 2019, the RMF reimbursed the room rate less any applicable lodging taxes. As a result of our audit, the Postal Service advised the RMF to reimburse employees up to the government lodging rate, plus any applicable taxes.
- Did not properly pay the meals and incidentals component of per diem¹⁹ expenses in 13 of the 27 instances, including:
 - Using incorrect values for either the first or last day of travel, or both, resulting in miscalculations of both employee and spousal travel benefits in three instances. Policy²⁰ states that an employee is eligible to receive 75 percent of the daily government per diem rate of the new duty station for the first and last day of travel. In addition, an employee's spouse is eligible for 75 percent of the employee's per diem rate. If not traveling with the employee, the spouse gets the employee's per diem rate.

¹⁵ The RMF advised its system default was internal-use only and a programmer would make the documentation available for Postal Service and OIG use.

^{16 &}quot;Portal Viewable by Client Only" and "Portable Viewable by All" allowed the Postal Service to view the documentation.

¹⁷ Disbursements made where proper Postal Service internal controls and processes were not followed. This does not mean the amount of loss or gain would necessarily be incurred, but that it was at risk.

¹⁸ Reimbursement of taxes is not addressed in the Postal Service's written relocation policies. The Postal Service addressed reimbursement of taxes in verbal communication with the RMF.

¹⁹ Maximum allowance federal employees are reimbursed for expenses incurred while on official travel.

²⁰ Handbook F-15-A, Relocation Policy - Nonbargaining (EAS) Employees, Chapter 331.1, Expenses for Transportation, Lodging, and Per Diem.

- Paying unallowable spousal benefits for one en route travel and two advance round trip benefits when the relocating employee traveled without their spouse.²¹
- Excluding dependents from the calculation of one en route travel and one temporary quarters benefits. Policy²² for both en route travel and temporary quarters benefits states employee dependents are eligible to receive a percentage of the daily per diem for meals and incidentals.
- Using the incorrect government location per diem rate allowance to calculate en route travel and temporary quarters benefit for five of the 13 instances. According to policy, per diem is paid based on the new duty station location.²³
- Reimbursed an en route travel lodging expense based on the government rate for the lodging location instead of the new duty station location per policy.²⁴
- Reimbursed a travel expense not related to the employee's relocation.
- Miscalculated the extra mileage expense allowed for en route travel. Policy states an employee will be reimbursed for an additional 100 miles when the new duty station is less than 300 miles from the employee's former residence.²⁵
- Omitted a reimbursable, invoiced cost for a household goods moving expense.

For the 27 instances, the Postal Service agreed with our conclusions and, as a result of our audit, took or will take action on correcting the payment amounts.

Recommendation #1:

We recommend the **Vice President, Controller**, direct the **Manager, Travel and Relocation**, to coordinate with the relocation management firm to establish full, unlimited access for appropriate Postal Service personnel to all relocation documentation in the relocation management firm's database.

Recommendation #2:

We recommend the **Vice President, Controller**, direct the **Manager**, **Travel and Relocation**, to implement processes and procedures to monitor the relocation management firm's execution of contractual and policy requirements.

Recommendation #3:

We recommend the **Vice President, Controller**, direct the **Manager, Travel and Relocation**, to develop written guidelines to clarify verbal relocation policy discussions with the relocation management firm.

Finding #2: Cost Savings for Relocation Benefits Program

The Postal Service has opportunities to reduce the costs for its relocation benefits program by aligning its relocation policy with the Federal Travel Regulation (FTR).²⁶ Payments made under Postal Service policy are significantly higher for the miscellaneous expense allowance and temporary quarters benefits compared to those for most civilian

"Payments made under Postal Service policy are significantly higher for the miscellaneous expense allowance and temporary quarters benefits compared to those for most civilian federal employees."

²¹ Handbook F-15-A, Chapter 323.311, Benefits Provided.

²² Handbook F-15-A, Chapter 331.1, Expenses for Transportation, Lodging, and Per Diem; Chapter 323.32 Temporary Quarters.

²³ Handbook F-15-A, Chapter 331.1 and Chapter 323.32.

²⁴ Handbook F-15-A, Chapter 331.1.

²⁵ Handbook F-15-A, Section 323.312, Advance Round Trip, Requirements.

²⁶ The FTR is the regulation in 41 Code of Federal Regulations (CFR), Chapters 300 through 304, that implements statutory requirements and Executive branch policies for travel by federal civilian employees and others authorized to travel at government expense. The Postal Service is not required to adhere to the FTR.

federal employees. The Postal Service could reduce miscellaneous expense allowance costs and reduce the risks associated with temporary quarters benefits.

Miscellaneous Expense Allowance

The miscellaneous expense allowance benefit is intended to cover any relocation related expenses not otherwise covered by the Postal Service. Postal Service policy allows a miscellaneous expense allowance payment of \$2,500 for nonbargaining²⁷ executive and administrative schedule²⁸ employees regardless of marital or family status and two weeks of base pay for postal career executive service²⁹ employees. The FTR's maximum miscellaneous expense allowance payment is \$650 for single employees and \$1,300 for a family.³⁰ In fiscal years 2019³¹ and 2020,³² the Postal Service paid a combined total of \$1,716,961 for miscellaneous expense allowance. If Postal Service management followed the FTR, they would have paid \$698,100³³ for miscellaneous expense allowances, saving \$1,018,861³⁴ between February 1, 2019, and May 12, 2020.

Temporary Quarters

The temporary quarters benefit is a calculated lump sum allowance intended to assist an employee and their family in offsetting expenses for commercial lodging. The Postal Service does not require receipts or demand repayment of the temporary quarters lump sum payment if the employee does not use the entire amount for commercial lodging when relocating. The FTR requires receipts or a travel voucher for temporary quarters expenses and requires employees to occupy temporary quarters. In addition, under the FTR, reimbursement may be based on actual expenses but only up to government per diem rates. Because the Postal Service does not require receipts, verify occupancy, or reimburse actual expenses, we estimate unsupported payments totaling \$2,843,821,35 based on temporary quarters benefits paid by the current RMF from February 1, 2019, through May 12, 2020.

Recommendation #4:

We recommend the **Vice President, Controller**, direct the **Manager, Travel and Relocation**, to evaluate and align, as appropriate, Postal Service relocation benefits policy for miscellaneous expense allowance and temporary quarters benefits with those benefits offered to other federal employees.

²⁷ Supervisory or other management personnel who are not subject to collective bargaining agreements.

²⁸ A salary structure that applies to most managerial and administrative employees.

²⁹ A staffing category that includes district, area, and headquarters executives, vice presidents, and officers.

³⁰ Federal Travel Regulation, issued January 4, 2004, Subpart B - Employee's Allowance for Miscellaneous Expenses, §302-16.102, amendments current through 2018-01.

³¹ Includes employees authorized relocation starting in February 1, 2019 through September 2019.

³² Includes miscellaneous expenses allowances paid from October 1, 2019, through May 12, 2020.

³³ To conservatively estimate savings, we applied the family amount of \$1,300 to each of the Postal Service's 537 relocations (for the time period February 1, 2019, through May 12, 2020).

³⁴ We consider the cost savings questioned costs. These are unnecessary, unreasonable, unsupported, or an alleged violation of law, regulation, contract, etc. Questioned costs may be recoverable or unrecoverable. They are usually a result of historical events.

³⁵ Assets or accountable items at risk of loss because of inadequate internal controls.

Management's Comments

Management agreed with the findings and recommendations. In separate correspondence, management also agreed with the monetary impact.

Regarding recommendations 1 and 3, management will obtain full, unlimited access to the RMF database and will create formal guidelines to address verbal communications with the RMF. Management plans to complete these actions by October 31, 2020.

Regarding recommendation 2, management will implement a process to monitor the RMF's relocation benefits disbursements to ensure they comply with contractual and policy requirements by December 31, 2020.

Regarding recommendation 4, management will compare the FTRs with the Postal Service's relocation benefits policy and determine if benefit alignment is feasible. Management will present their evaluation to the Chief Human Resources

Officer for consideration and potential action. Management intends to complete these actions by June 30, 2021.

See Appendix B for management's comments in their entirety.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations, and management's planned corrective actions should resolve the issues identified in the report.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. The recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

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Appendix A: Additional Information

Scope and Methodology

We limited the scope of our audit to the contract between the Postal Service and the current RMF effective February 1, 2019.

To accomplish our objectives, we:

- Reviewed Postal Service relocation benefits program policies and procedures.
- Reviewed the contract between the Postal Service and the RMF.
- Interviewed Postal Service personnel involved with the relocation benefits program to gain an understanding of the relocation processes and procedures in place.
- Reviewed the Postal Service compliance with contract requirements including payment terms, initiation call, home purchase program, accounting services, direct expenses, and key personnel requirements.
- Reviewed the RMF's compliance with contract requirements including employee counseling, initiation file creation, initiation call, home purchase program, mortgage counseling, destination services, accounting services, movement and storage of household goods, international services, management of real estate inventory, direct expenses, performance, reporting and online database, costs and other considerations, auditing practices, key personnel, information technology requirements, and security and privacy requirements.
- Randomly selected 151 relocating employees out of a universe of 545.

- Assessed relocation benefits paid from February 1, 2019, through March 9, 2020, to determine whether they were accurate and properly paid.
- Reviewed all 537 miscellaneous expense allowances and 543 temporary quarters benefits from February 1, 2019, through May 12, 2020.
- Compared Postal Service relocation policies to those of the FTR.

We conducted this performance audit from March through September 2020 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management on September 11, 2020 and included their comments where appropriate.

Using the RMF's database, we assessed relocation payments made by the RMF for benefits such as household goods transportation and storage and employee travel. Our assessment included a review of source documents, such as invoices and receipts, to verify the source documents supported amounts paid. We determined the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

The OIG did not identify any prior audits or reviews related to the objective of this audit within the last five years.

Appendix B: Management's Comments

CARA M. GREENE VICE PRESIDENT, CONTROLLER



September 28, 2020

LAZERICK C. POLAND DIRECTOR, AUDIT OPERATIONS

SUBJECT: Relocation Benefits Program Report Number 20-126

Management agrees with the OIG's findings.

<u>Recommendation [1]:</u> The OIG recommends the VP, Controller direct the Manager, Travel & Relocation to coordinate with the RMF to establish full, unlimited access for appropriate Postal Service personnel to all relocation documentation in the RMF's database.

<u>Management Response:</u> Management agrees, and will work with the RMF to obtain full, unlimited access to all relocation documentation in their database.

Target Implementation Date: October 2020

Responsible Official:

Manager, Travel & Relocation

<u>Recommendation [2]:</u> The OIG recommends the VP, Controller direct the Manager, Travel & Relocation to implement processes and procedures to monitor the RMF's execution of contractual and policy requirements.

<u>Management Response:</u> Management agrees and will implement a process to monitor the RMF's execution of relocation benefits disbursement ensuring compliance with contractual and policy requirements.

Target Implementation Date: December 2020

Responsible Official:

Manager, Travel & Relocation

Recommendation [3]: The OIG recommends the VP, Controller direct the Manager, Travel & Relocation to develop written guidelines to clarify verbal relocation policy discussions with the RMF.

Page 1 of 2

<u>Management Response:</u> Management agrees and will create formal guidelines to address communication provided verbally to the RMF regarding relocation policy/process instructions and clarifications.

Target Implementation Date: October 2020

Responsible Official:

Manager, Travel & Relocation

Recommendation [4]: The OIG recommends the VP, Controller direct the Manager, Travel & Relocation to evaluate and align, as appropriate, Postal Service relocation benefits policy for the miscellaneous expense allowance and temporary quarters benefits with those benefits offered to other federal employees.

<u>Management Response:</u> Management agrees and will review and evaluate the Federal Travel Regulation in comparison to Postal Service's relocation benefits policy to determine whether, and to what degree, further beneficial alignment is feasible. The comparison will be presented to CHRO for further consideration and action, if determined appropriate.

Target Implementation Date: June 2021

Responsible Official:

Manager, Travel & Relocation

Respectfully submitted,

Cara M. Greene

VP, Controller

cc: Manager, Corporate Audit Response Management Manager, Travel & Relocation

OFFICE OF INSPECTOR GENERAL

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