




Office of Inspector General
Pension Benefit Guaranty Corporation

July 30, 2019

TO: Alice Maroni
Chief Management Officer

FROM: Brooke Holmes 
Assistant Inspector General for Audits

SUBJECT: Final Inspection Memorandum Report – PBGC's Telework Program (*Report No. IN-2019-12/Project No. IN-19-131*)

I am pleased to transmit this final report on our inspection of PBGC's telework program. We conducted this inspection to determine whether PBGC has established adequate internal controls over telework and administers its program in accordance with federal laws, regulations, guidance and agency policy. During our inspection, we identified opportunities for improvement of this program, as discussed below.

Summary

We found PBGC has established internal controls over the telework program and administers the program consistent with statutory and regulatory requirements. However, PBGC has opportunities to improve the effectiveness of its internal controls; specifically, performance of telework timekeeping responsibility needs improvement, telework information should be accurately reported to OPM, and the effectiveness of the telework program must be assessed. Based on this analysis, we recommended PBGC provide additional guidance on telework codes for timesheets, clarify telework timesheet codes in its guidance, ensure the Agency Telework Coordinator (ATC) is fulfilling all required tasks, and update telework guidance as required by 5 CFR Part 630, Subpart P § 630.1605.

Background

Telework is a work flexibility arrangement under which an employee performs the duties and responsibilities of his or her position from an alternative worksite other than a government facility. The Telework Enhancement Act of 2010 expanded on the telework legislation of

calendar year 2000 (Pub. L. No. 106-346-Appendix, § 359), which first required executive agencies to establish a telework policy. The Telework Enhancement Act was designed to ensure more systemic implementation of telework in federal agencies.

Under the Telework Enhancement Act, employees participating in telework programs must complete training prior to engaging in telework and secure a written agreement between an employee and his or her manager. The primary purpose of the telework agreement is to specify parameters between participating employees and their managers who will retain and enforce the agreements.

The Telework Enhancement Act established baseline expectations for the federal telework program. Every federal executive agency is required to:

- Establish a policy under which eligible employees may be authorized to telework;
- Determine employee eligibility to participate in telework;
- Notify all employees of their eligibility to telework;
- Incorporate telework into Continuity of Operations (COOP) plans;
- Ensure each eligible employee authorized to telework enters into a written telework agreement with his/her supervisor;
- Ensure that an interactive telework training program is provided to eligible employees and their managers and that the program is successfully completed by employees prior to entering into a written telework agreement;
- Designate a Telework Managing Officer (TMO) to serve as the primary point of contact with OPM on telework matters; and
- Consult with OPM as needed while developing telework policies for guidance in various areas, such as performance management, pay and leave, recruitment and retention, etc.

Federal telework programs are established primarily to meet agency mission and operational needs. Telework saves money by helping government reduce real estate and energy costs and promote management efficiencies; makes us more resilient in severe weather and other emergencies; improves the quality of employee work-life; and increases employment opportunities for persons with disabilities. PBGC recognizes telework is an important tool to enhance employee performance, morale, retention, organizational productivity, and reduce the costs of transportation and negative impact on the environment.

Required Reporting on the Status of Telework

Under the Telework Enhancement Act, agencies are required to report telework data to OPM on an annual basis. The *Call for Telework Data* provides an electronic form to facilitate systematic collection of agencies telework information. Only designated points of contact have access to the Call and, through it, agencies report employee telework participation, program characteristics, and outcomes related to telework implementation.

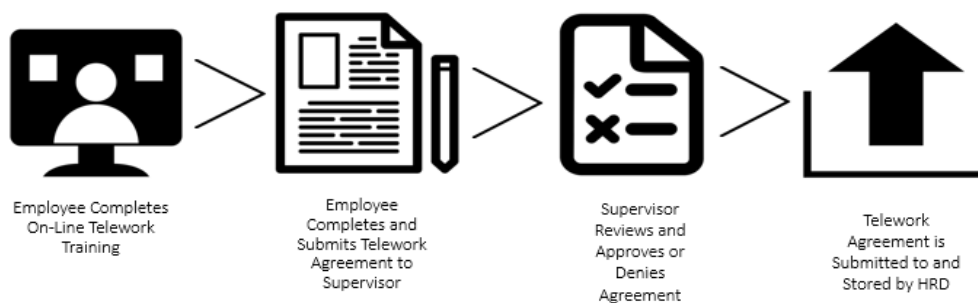
For the FY 2017 OPM report to Congress, *Status of Telework in the Federal Government* (January 2019), PBGC reported 953 employees with 845, or 89 percent, participating in some form of telework.¹

PBGC Telework Program Responsibilities

The Human Resources Department (HRD) within the Office of Management and Administration (OMA) is responsible for overseeing the telework program. The Director of HRD (1) designates the Agency Telework Coordinator (ATC), (2) serves as the Telework Managing Officer (required by the Telework Enhancement Act) and (3) provides information, guidance, advice and assistance to senior level management on telework policies and best practices.

In FY 2018, HRD transitioned telework agreements from paper to a SharePoint telework site, which allows for the electronic submission of telework agreements and required supporting documents to the HRD staff. This electronic information is maintained by HRD in a central repository. (Figure 1)

Figure 1. Telework Application and Approval Process



Source: OIG analysis of PBGC's Telework Program.

¹ When our inspection began, PBGC had reported teleworking for FY 2017.

We credit PBGC for changing to electronic documentation as it has resulted in the strengthening of controls.

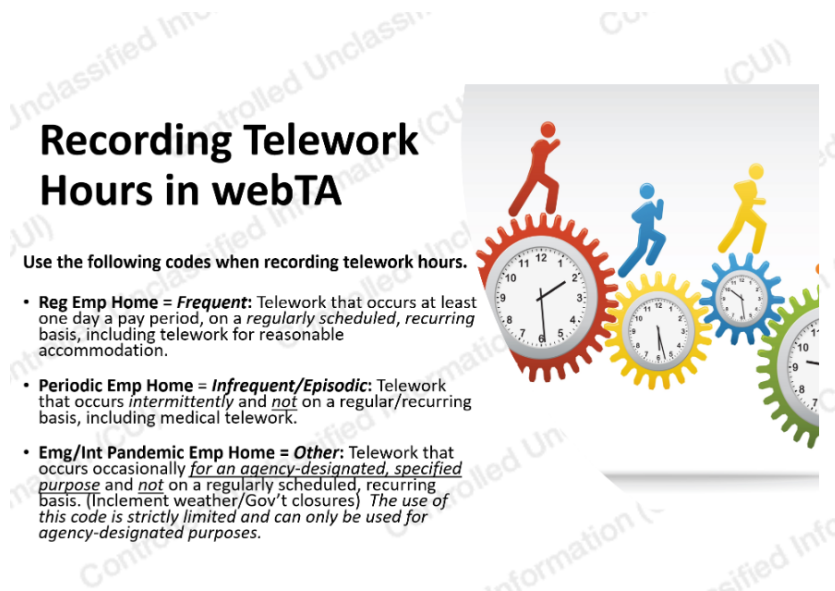
The ATC provides day-to-day oversight for the telework program, including providing guidance, advice, and assistance to management and employees. The ATC also:

- Disseminates telework program materials and information to PBGC management and employees;
- Reviews and maintains approved telework agreements and related documents for completeness and adherence to program policy, regulations, and guidelines;
- Provides orientation of all newly approved telework participants;
- Administers surveys and other types of information gathering instruments to program participants and management to assess program effectiveness;
- Prepares an annual telework report, including recommendations for enhancements to the program that assess the impact of telework on areas related to PBGC's efficiency, effectiveness, and sustainability, such as emergency readiness, energy use, recruitment and retention, performance, productivity, and employee attitude and opinions.
- Performs recurring reviews of employee participation to ensure compliance with PBGC guidelines, and legal and regulatory requirements; and
- Monitors changes in law and practice that may have an impact on the PBGC telework program.

PBGC's Timekeeping System and Telework

PBGC tracks telework in *webTA*, an internet-based time and attendance system. On a bi-weekly basis, PBGC employees code their telework hours in webTA, using codes "F" for "Frequent," "I" for "Infrequent/Episodic," or "O" for "Other." (Figure 2)

Figure 2. PBGC Types of Telework, webTA Telework Codes, and Definitions



Source: PBGC's Telework Intranet page, April 22, 2019.

Finding 1: Performance of Telework Timekeeping Responsibilities Needs Improvement

Section 6502(b) of the Telework Enhancement Act makes it mandatory for a teleworking employee to have a written agreement with an agency manager that outlines the terms of the telework arrangement. PBGC's Telework Program (PM 10-05, dated November 10, 2011) states that it is the responsibility of an employee to complete a telework agreement. Once an agreement is completed, the employee's immediate supervisor is responsible for the decision to approve the agreement. Additionally, the ATC reviews and maintains approved telework agreements to ensure completeness and adherence to program policy, regulation and guidance. (Figure 1) After the supervisor's initial approval, PBGC requires an annual renewal of the telework agreement. If an employee is detailed or reassigned, the employee must reapply to the program.

Not All Employees Who Teleworked Had a Valid Telework Agreement

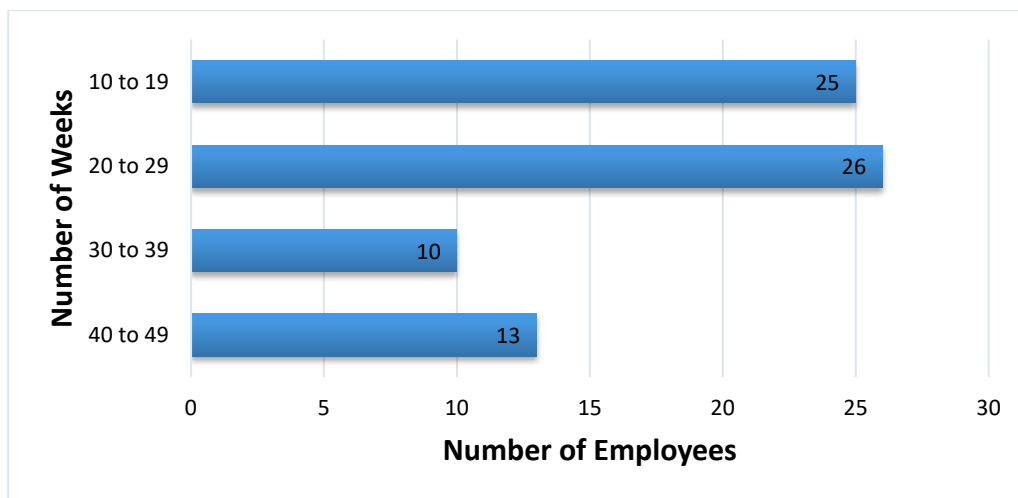
For FY 2018, of the 855 employees who charged time to telework, we found 45 did not have a valid telework agreement. Of the 45 employees, while a few teleworked only once or twice during the year, more than 50 percent routinely teleworked during the year.

Supervisors Approved Employees Teleworking More than the Two Days a Week Allowed by PBGC Policy

After approval of the telework agreement, an employee's supervisor is responsible for monitoring the employee's telework. The supervisor is to determine if an employee has sufficient portable work, review and make decisions on an employee's telework requests, and verify and certify an employee's time and attendance.

In our analysis of the FY 2018 telework data, we found that supervisors approved 74 employees teleworking 3 days or more a week using code "F." (Figure 3) PBGC policy, however, allows for "regular and recurring" telework for employees, with supervisory approval, of only two days per week (up to four days in a pay period).

Figure 3. Number of Weeks in FY 2018 74 Employees Teleworked Three Days or More



Source: OIG analysis of FY 2018 PBGC/HRD time and attendance data.

Supervisors Approved Timesheets Containing Incorrect Telework Codes

Supervisors are the first-line of defense in ensuring telework is performed properly. They know the day-to-day attendance of their employees and which employee has a telework agreement. When reviewing timesheets, it is critical for supervisors to ensure staff are coding time properly.

In our sample, we identified four employees whose telework was not consistent with their approved telework agreements; specifically, we found one employee teleworked on a "recurring" basis more often than allowed by the employee's telework agreement, and three

other employees claimed "frequent" telework when their agreements approved only "situational" or "episodic" telework. Managers for three of the four employees acknowledged the employees incorrectly coded their time. The fourth manager was not aware there are different codes for "episodic" and "frequent" telework.

ATC's Role in Monitoring Telework

PBGC's Telework Program (PM 10-05 dated November 10, 2011, section 8.d.8.) requires the ATC to perform recurring reviews of employee participation to ensure compliance with PBGC guidelines and other legal and regulatory requirements. Given employees are teleworking without a valid agreement and employees are incorrectly coding their telework, it appears the ATC has not, as required, adequately reviewed webTA time charges. We did not find evidence of recurring reviews for compliance conducted in FY 2018. However, the ATC told us at the end of 2018, HRD requested managers verify their employee's telework agreements and types of telework charged. The limited scope review described by the ATC would not ensure, as required by PM 10-05, compliance with legal and regulatory requirements and PBGC guidelines or provide program oversight that would identify potential areas of risk in the program.

According to the GAO's *Standards for Internal Control in the Federal Government*, internal control is a dynamic process that has to be adapted continually to the risks and changes an entity faces. Monitoring of the internal control system is essential in helping internal control remain aligned with changing objectives, environment, laws, resources, and risks. Internal control monitoring assesses the quality of performance over time and promptly resolves the findings of audits and other reviews.

Given that we found (1) not all employees had a valid telework agreement, (2) supervisors approved employees teleworking more than the two days a week allowed by PBGC, and (3) supervisors approved timesheets containing incorrect telework codes, corrective actions are necessary. For an efficient and effective telework program to exist, consistent monitoring by supervisors and the ATC is vital to ensure proper timekeeping of employees, proper reporting to OPM on telework goals, and to discourage abuse of the telework program.

Finding 2: PBGC Did Not Accurately Report Telework Information to OPM

Under section 6506 of the Telework Enhancement Act, agencies are required to report to OPM on an annual basis with information, including employee telework participation, program characteristics, and outcomes related to telework implementation. The OPM Guide defines two types of telework: (1) "routine" telework in which telework occurs as part of an ongoing,

regular schedule; and (2) "situational" telework that is approved on a case-by-case basis, where the hours worked were NOT part of a previously approved, ongoing and regular telework schedule. Examples of situational telework include telework as a result of inclement weather, doctor appointment, or special work assignments, and is sometimes also referred to as situational, episodic, intermittent, unscheduled, or ad-hoc telework.

PBGC's Telework Program Directive, PM 10-05, defines four types of telework:

- *Regular/Recurring*. Telework day that occurs on an agreed upon day of the week or occurs on an agreed upon frequency.
- *Episodic/Short Term*. Telework at an alternative work location (AWL) or incidentally and not on a regular/recurring telework schedule.
- *Medical*. Telework for an agreed upon period, granted in no more than three-month increments, in which an employee is allowed to work from an AWL because the employee or the employee's family member suffers from a temporary illness or injury.
- *Emergency Closures/Unscheduled*. Should business needs require it, an employee on an approved Telework Agreement can be required by the supervisor to work during emergency closures even if that day is not a regular telework day.

Further, PBGC's timekeeping system, webTA, has three telework codes (Figure 2):

- Reg Employee Home telework: code F-Frequent
- Periodic Emp Home telework: code I-Infrequent/Episodic
- Emg/Int Pandemic Employee Home: code O-Other

When reviewing PBGC's FY 2017 submission to OPM, we found the Corporation reported that 410 employees performed "situational" telework and PBGC underreported this number by 63. The data PBGC reported to OPM was derived from the time and attendance system by an HR specialist from payroll according to parameters the ATC provided. When we reviewed the data extractions, we found the number of employees who teleworked on a situational basis in FY 2017 included those who entered only the webTA code "I" and left out time accounted for by code "O." The HR specialist who derived the data confirmed that code "O" was inadvertently not included in the FY 2017 data call. Also, code "O" had not been included in the most recent data call for FY 2018.

The varying definitions between OPM policy, PBGC policy, and the time and attendance system, resulted in underreported statistics related to telework. PBGC's strategic goal to maintain high standards of stewardship and accountability recognizes the importance on the investment in

human capital to serve its customers and achieve its mission. Telework allows employers to assist with creating work-life balance for employees and reporting accurately on the telework statistics is vitally important to its ability to determine whether the program is a success or failure.

Finding 3: PBGC Has Not, As Required, Assessed the Effectiveness of the Telework Program

Section 6505 of the Telework Enhancement Act requires that each agency designate a Telework Managing Officer (TMO) who is responsible for, among other things, policy development and implementation. The TMO also serves as an advisor for agency leadership and a resource for managers and employees. OPM's *Guide to Telework in the Federal Government*, dated April 2011, further defines the TMO's responsibilities to include helping "with the development of goals and metrics in order to evaluate the effectiveness of the program." The OPM Guide states that the TMO "is the single accountable person according to the law for the agency's telework program" and "the position is meant to be a strategic thinker and planner who helps the agency to incorporate telework in a way that makes good business sense." The PBGC policy for telework specifies that the Director of Human Resources Department serves as the Agency Telework Managing Officer (TMO); designates an Agency Telework Coordinator (ATC); and provides information, guidance, advice, and assistance to senior level management on telework policies and best practices.

As required by PBGC Directive 10-05, section 8.d, dated November 10, 2011, the ATC provides day-to-day oversight for the PBGC telework program. The position has other required duties, including:

- Administering surveys and other types of information gathering instruments to program participants and management to assess program effectiveness;
- Preparing an annual telework report, including recommendations for enhancements to the program that assess the impact of telework on areas related to PBGC's efficiency, effectiveness, and sustainability, such as: emergency readiness, energy use, recruitment and retention, performance, productivity, and employee attitude and opinions regarding telework; and
- Monitoring changes in laws and practice that may have an impact on the PBGC Telework Program.

For FYs 2017 and 2018, PBGC confirmed that it had neither administered surveys or other types of information gathering instruments to assess program effectiveness, nor prepared the required annual telework report to evaluate the telework program's effectiveness, efficiency

and sustainability. According to PBGC, these omissions occurred due to a lack of available data. However, we found such data is available to PBGC. For example, the Workplace Solutions Department, the division responsible for the telework program prior to HRD, drafted an annual report assessing the telework program and finding risks related to maintaining active agreements, employees working without agreements, record keeping, and timecard coding.

Further, the ATC is required to monitor changes in laws and practice that may have an impact on the PBGC telework program. Telework regulations (5 CFR Part 630, Subpart P § 1605) were updated in May 2018, and now warn that an agency will be unable, in most circumstances, to grant weather and safety leave to an employee who is a telework program participant and able to safely work at an approved telework location. The OPM *Governmentwide Dismissal and Closure Procedures* (November 2018) require agencies to adjust telework agreements to reflect new weather and safety leave law and regulations.

Since May 2018, PBGC sent at least two informational emails (September 13 and November 14, 2018) to advise employees of this new regulation. However, the PBGC telework directive and associated agreement has not been so updated. Additionally, as of April 2019, the PBGC telework intranet still shows that PBGC employees will be granted an excused absence when federal offices are closed, and an employee is scheduled to telework. (See Figure 4)

Figure 4. PBGC's Telework Frequently Asked Questions

If Federal Offices are closed on my regularly scheduled telework day, am I required to telework?

All PBGC employees (including employees who are regularly scheduled to telework) will be granted excused absence (administrative leave) for the total number of hours they were scheduled to work unless they are:

- On official travel outside of the Washington, DC, area,
- On leave without pay, or
- On an alternative work schedule (AWS) day off

PBGC employees will always receive specific guidance from PBGC under those circumstances.

Source: PBGC's Telework Intranet Frequently Asked Questions, April 26, 2019.

Additionally, agencies should develop explicit procedures in advance detailing the workplace flexibilities that employees may use during emergencies. The OPM guide states:

[A]gencies should implement sound human capital policies and procedures regarding telework and the various weather and safety leave exceptions. Agencies have the discretion to make those exceptions consistent with the regulatory provisions for weather and safety leave. Those exceptions and the procedures under which an agency may provide weather and safety leave should be clearly communicated to agency employees. Since many employees telework at home, agencies should address in their telework policies potential situations that may prevent or impact an employee's ability to effectively perform his or her duties at home. This includes policies regarding the conditions under which employees may telework during a Federal office closure, even if they have a young child or other person requiring the presence of a caregiver in the home. However, if these circumstances diminish an employee's ability to perform their duties via telework during official hours of work, the employee may not be eligible to telework under these conditions[.]

GAO's *Standards for Internal Control in the Federal Government*, September 2014, requires management to design control activities to achieve objectives and respond to risks. These control activities are policies, procedures, techniques, and mechanisms that enforce management's directives to achieve an objective and address related risks.

Due to a lack of solicitation for feedback on the Telework Program, lack of review of program performance and lack of incorporation of legal changes to the program, PBGC only had information to answer two of the eight questions with respect to specific outcome goals in its responses to the 2017 Telework Data Call report to Congress. OPM asked the agency whether it had made progress in using telework to further the goals of employee recruitment, employee retention, improved employee performance, improved employee attitudes (e.g., job satisfaction), emergency preparedness, reduced energy use, reduced/avoided real estate costs and reduced commuter miles. PBGC reported that it had made progress in using telework to improve employee attitudes and emergency preparedness. The real impact of not assessing the effectiveness of a policy or program in terms of its results is that management will not have the data needed to determine whether the program is a success or failure and PBGC will be limited in its ability to identify needed improvements to the program.

Recommendations

We recommend that the Office of Management and Administration:

1. Provide guidance to employees, including those who approve timesheets, to ensure an understanding of the telework codes and that those codes are consistent with the type of telework elected by an employee in the employee's telework agreement. (OIG Control Number OMA-11)

PBGC's Response and OIG's Evaluation

Resolved. PBGC agrees with the recommendation and has provided ongoing communications to announce the appropriate telework codes employees should use during designated telework activities. Additionally, the telework training for managers has been updated to include supervisor's responsibilities for ensuring employees/timekeepers are coding telework properly in webTA. HRD plans on completing these actions by November 1, 2019.

Closure of this recommendation will occur when PBGC provides evidence that HRD has communicated the appropriate codes for designated telework activities, as well as, updated training materials to include supervisor's responsibilities for ensuring telework is properly coded in webTA.

2. Update PBGC guidance on telework definitions to ensure the definitions are aligned with OPM guidance and webTA coding. (OIG Control Number OMA-12)

PBGC's Response and OIG's Evaluation

Resolved. PBGC agrees with the recommendation and has provided agency-wide guidance on the current telework codes and definitions applicable to PBGC. Additionally, HRD has identified two episodic/situational telework codes to distinguish between agency designated telework activities and telework outside of employee's regular approved telework schedule. Future reports to OPM will include data for both episodic/situational telework codes. HRD plans on completing these actions by December 31, 2019.

Closure of this recommendation will occur when PBGC provides evidence of the updated telework definitions and that submissions to OPM include data for both episodic/telework codes.

3. Ensure the ATC performs all duties as required by PBGC's Telework Program Directive, including assessing the effectiveness of the telework program. (OIG Control Number OMA-13)

PBGC's Response and OIG's Evaluation

Resolved. PBGC agrees with the recommendation. During FY 19, the ATC has provided day to day oversight for the Telework Program. The ATC conducted a 100% review of telework agreements for completeness and adherence to program policy. The ATC also conducts quarterly reviews to ensure that only employees with a valid telework agreement are participating in program. The ATC will launch a telework survey in FY 20 to obtain feedback on the PBGC Telework Program, as well as, perform a comparison of the annual OPM Telework Data submissions to measure goals and objectives. The ATC will provide management with an annual assessment on the effectiveness of the Telework Program. HRD states the ATC will perform all duties as required by Directive by December 31, 2019.

Closure of this recommendation will occur when PBGC provides evidence that the ATC has performed all duties as required by PBGC's Telework Program Directive.

4. Update the PBGC's Telework Program policies and procedures, and telework agreements, as required by 5 CFR Part 630, Subpart P § 630.1605, and detailed in OPM's *Governmentwide Dismissal and Closure Procedures* guide. (OIG Control Number OMA-14)

PBGC's Response and OIG's Evaluation

Resolved. PBGC agrees with the recommendation. HRD has updated the agency's Telework SharePoint Site to include guidance on governmentwide dismissal and closure procedures. Additionally, communications have been distributed agency wide providing guidance to employees on the current dismissal and closure procedures. HRD will update the agreements for renewal in 2020 to include language that reflect weather and safety leave law and regulations. HRD plans on completing all updates to SharePoint, closure procedures, and telework agreements by April 1, 2020.

Closure of this recommendation will occur when PBGC has provided evidence that PBGC's SharePoint, closure procedures, and telework agreements are updated to current governmentwide dismissal and closure procedures.

cc: Judith Starr, General Counsel
Arrie Etheridge, Director, Human Resources Department
Frank Pace, Director, Corporate Controls and Reviews Department
Latreece Wade, Acting Risk Management Officer
Department of Labor Board staff
Department of the Treasury Board staff
Department of Commerce Board staff

Appendix I: Objective, Scope and Methodology

Objective

Our objective was to determine whether PBGC had established adequate internal controls over its telework program and administered it in accordance with federal laws, regulations, guidance and PBGC policy.

Scope

To answer the questions in our objectives, we reviewed selected data for FY 2018 and FY 2017 generated from the time and attendance system—webTA. Our review primarily focused on the performance data for FY 2018 and the controls currently implemented. But, to assess the reliability of the data reported to OPM, we reviewed data from the OPM report published in FY 2017, which was the latest available. We conducted this inspection from November 2018 through March 2019 in Washington, DC.

Methodology

To accomplish our inspection objectives, we:

- Reviewed federal laws, regulations, guidance and PBGC policies and procedures applicable to the telework program;
- Solicited input from stakeholders by posting related questions on the OIG website; and
- Interviewed key personnel from HRD and WSD.

Additionally, we analyzed the PBGC FY 2017 Telework Data Call submission to OPM and compared the data to webTA reports and guidance from OPM. For FY 2018, we analyzed webTA reports for PBGC employees and judgmentally sampled 86 employees to review their supporting documentation for telework agreements and required telework training.

This inspection was conducted in accordance with the Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we plan and perform the inspection to obtain sufficient, competent, and relevant evidence to provide a reasonable basis for our findings, conclusions, and recommendations based on our inspection objectives.

Appendix II: Agency Response



Pension Benefit Guaranty Corporation
1200 K Street, N.W., Washington D.C. 20005-4026

July 22, 2019

TO: Brooke Holmes
Assistance Inspector General for Audits (OIG)

FROM: Arrie Etheridge 
Director, Human Resources Department

SUBJECT: Response to Office of Inspector General (OIG) Draft Audit Report, PBGC
Telework Program (Project No. IN-19-131)

Thank you for the opportunity to comment on the OIG's Draft Audit Memorandum Report, relating to PBGC's Telework Program.

The Human Resources Department has outlined in the attachment our responses to the recommendations noted in the report.

Attachment: Response to OIG Recommendations
cc: Alice Maroni, Chief Management Officer (CMO)

Draft Audit Report, PBGC's Telework Program

Our responses on the specific recommendations in the draft report are as follows:

1. Provide guidance to employees, including those who approve timesheets, to ensure an understanding of the telework codes and those codes that are consistent with the type of telework elected by an employee in the employee's telework agreement. (OIG Control Number – **OMA-11**)

PBGC Response: PBGC agrees with the recommendation. The Human Resources Department (HRD) has collaborated with the Payroll and Travel Office (PTO) to announce the appropriate telework codes employees should use during agency designated telework activities. HRD has provided quick tips, flyers, email announcements, splash screen marketing and FAQs on the Telework Program, highlighting the types of telework codes to use. Additionally, the Telework Training for Managers has been updated to include a section on supervisor's responsibilities for ensuring employees/timekeepers are coding telework properly in WebTA.

Target Completion Date: 11/1/2019

2. Update PBGC guidance on telework definitions to ensure the definitions are aligned with OPM guidance and WebTA coding. (OIG Control Number – **OMA-12**)

PBGC Response: PBGC agrees with the recommendation. HRD has established a Telework SharePoint Site where employees have access to up-to-date guidance on the Telework Program. The site includes the telework agreement form, FAQs, fact sheets and tips for teleworking. HRD has consulted with PTO to align the codes with OPM, however, the descriptions of the telework codes in WebTA are utilized by other agencies and cannot be customized at this time. HRD has provided agency wide guidance on the current telework codes and definitions applicable to PBGC.

For PBGC reporting purposes, HRD has identified two episodic/situational telework codes to distinguish between agency designated telework activities (WMATA closures, inclement weather, etc.) and telework outside of employee's regular approved telework schedule. Future reports to OPM will include data for both episodic/situational telework codes.

Target Completion Date: 12/31/2019

3. Ensure the ATC performs all duties as required by PBGC's Telework Program Directive, including assessing the effectiveness of the Telework Program. (OIG Control Number – **OMA-13**)

PBGC Response: PBGC agrees with the recommendation. During FY19, the Agency Telework Coordinator (ATC) has provided day to day oversight for the Telework Program. During the 2019 annual agency recertification/submission period, the ATC conducted 100% review of telework agreements for completeness and adherence to program policy and notified management and employees when an agreement required updating. The ATC conducts quarterly reviews to ensure that only employees with a valid

telework agreement are participating in the Telework Program. As well as continual communication with the Employee and Labor Management Division to ensure changes in eligibility are captured. The ATC, in collaboration with OIT, launched a fully automated telework agreement form. The automated form now ensures a seamless approval/disapproval process while also creating a robust records management system. The new Telework SharePoint Site provides management with an instant telework report/status for their direct reports. The ATC will launch a telework survey in FY20 to obtain feedback on the PBGC Telework Program as well as comparing annual OPM Telework Data submissions to measure goals and objectives. The ATC will provide management with an annual assessment on the effectiveness of the Telework Program.
Target Completion Date: 12/31/2019

4. Update the PBGC's Telework Program policies and procedures, and telework agreements, as required by 5 CFR Part 630 Subpart P § 630.1605 and detailed in OPM's *Governmentwide Dismissal and Closure Procedures* guide. (OIG Control Number – OMA-14)

PBGC Response: PBGC agrees with the recommendation. HRD has updated the PBGC's Telework SharePoint Site to include guidance on governmentwide dismissal and closure procedures. Additionally, communications have been distributed agency wide providing guidance to employees on the current dismissal and closure procedures. HRD will update the agreements for renewal in 2020 to include language that reflect weather and safety leave law and regulations.
Target Completion Date: 4/01/2020

Appendix III: Acronyms

ATC	Agency Telework Coordinator
FY	Fiscal Year
HRD	Human Resources Department
OIG	Office of Inspector General
OPM	Office of Personnel Management
PBGC	Pension Benefit Guaranty Corporation
TMO	Telework Managing Officer
WSD	Workplace Solutions Department

Appendix IV: PBGC OIG Contact and Staff Acknowledgement

PBGC OIG Contact	Brooke Holmes, 202-229-3790 or holmes.brooke@pbgc.gov
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Staff Acknowledgement	In addition to the contact named above, Charles Yao, Audit Manager, and Christina Harris, Senior Auditor, made key contributions to this report.
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Appendix V: Feedback

Please send your comments, suggestions, and feedback to OIGFeedback@pbgc.gov and include your name, contact information, and the report number. You may also mail comments to us:

Office of Inspector General
Pension Benefit Guaranty Corporation
1200 K Street NW, Suite 480
Washington, DC 20005

If you want to discuss this report or your comments with a member of the Office of Inspector General staff, please contact our office at (202) 326-4030.