



U.S. RAILROAD RETIREMENT BOARD

OFFICE OF INSPECTOR GENERAL

Audit of the Railroad Retirement Board's Organizational Structure and Field Service Operations

Report No. 24-03

February 8, 2024



What RMA Found

RMA Associates, LLC (RMA) determined that the Railroad Retirement Board's (RRB) organizational structure itself did not impede the agency's primary mission, cross organizational communications, or transactional flows. However, RMA determined that the RRB: 1) did not create an agencywide capital plan, 2) could not determine the optimal number of field service employees needed to support call demand, 3) lacked communications between four of its seven primary units, 4) did not document or distribute its lessons learned from the COVID-19 pandemic, 5) did not offer language assistance for customers with Limited English Proficiency (LEP), 6) did not offer a robust online services platform, and 7) could not determine the individual operating or rental costs for each of its 53 field offices located across the country.

RMA determined that these issues occurred because of an upper management retirement, lack of reliable operational data for field services, and lack of comprehensive policies and procedures. The RRB explained there was insufficient annual appropriations to simultaneously modernize RRB's systems and applications.

As a result of these issues, RRB did not have sufficient insights into its field service resources and costs to increase customer service or to implement future requirements. Field service staff and the railroad community were exposed to high call demands, long wait times, and the processing of paper documents. Customers with LEP may not have received correct or accurate information about their RRB benefits.

What RMA Recommended

To address the issues identified in this audit, RMA made 17 recommendations concerning capital planning, reliable data, online services, policies and procedures for communications, lessons learned from the pandemic, and LEP customers. RRB management concurred with eight recommendations and did not concur with nine recommendations.

What We Did

RRB Office of Inspector General (OIG) engaged RMA to conduct a performance audit of the RRB's organizational structure and field service operations. For fiscal years 2019 through 2021, the average total cost for Bureau of Field Service was approximately \$24 million per year.

RMA conducted this audit in accordance with performance audit standards established by generally accepted government auditing standards. RMA is responsible for the audit report and the conclusions expressed therein. RRB OIG does not express any assurance on the conclusions presented in RMA's audit report.

The overarching audit objectives were to assess the RRB's overall organizational structure and to determine the efficiency and effectiveness of field service operations. For details on the eight audit objectives, see the Objectives section in RMA's audit report.

The scope of the audit was the RRB's organizational structure and field service operations from fiscal years 2019 through 2021.

Railroad Retirement Board (RRB)
Office of Inspector General (OIG)

Audit of the RRB's Organizational Structure and Field
Service Operations

Final Performance Audit Report

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RMA Associates, LLC (RMA) conducted a performance audit of the Railroad Retirement Board's (RRB) organizational structure and field service operations.

Our audit objectives were to 1) assess RRB's overall organizational structure to determine whether it impedes the agency's primary mission, cross organizational communications, and transaction flows; 2) identify various models for organizational changes that will improve the efficiency and effectiveness of RRB operations; 3) determine operating costs and rent for the 53 field offices and staff for each fiscal year; 4) assess the effectiveness and efficiency of the 53 field service offices and how it has changed over the years provided in the scope; 5) determine whether the overall productivity of field service offices justify 53 field offices across the country; 6) determine whether the population and location of where railroad employees (both currently employed in railroad service and retired railroad employees) reside justify 53 field offices across the country; 7) determine the optimal number of field service employees that are needed to address the needs and locations of the railroad community; and 8) identify technological improvements for field service to address customer service needs, including those that can be addressed virtually or remotely.

We conducted this performance audit in accordance with generally accepted government auditing standards.¹ 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

As a result of our audit, we identified 7 findings and issued 17 recommendations, which are included in the accompanying report.

Respectfully,

RMA Associates

RMA Associates, LLC

¹ Government Auditing Standards, GAO-21-368G, April 2021.

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Introduction

This report presents the results of RMA Associates, LLC's (RMA) performance audit of the Railroad Retirement Board's (RRB) organizational structure and field service operations. RRB's organizational structure consists of four bureaus, three offices, and the Office of Equal Opportunity. RRB's Bureau of Field Service (BFS) provides all aspects of customer relations on behalf of the agency in person and by telephone to railroad employees and their families.

Objectives, Scope, and Methodology

Objectives

The objectives of this audit were to:

1. Assess RRB's overall organizational structure to determine whether it impedes the agency's primary mission, cross organizational communications, and transaction flows;
2. Identify various models for organizational changes that will improve the efficiency and effectiveness of RRB operations;
3. Determine operating costs and rent for the 53 field offices and staff for each fiscal year;
4. Assess the effectiveness and efficiency of the 53 field service offices and how it has changed over the years provided in the scope;
5. Determine whether the overall productivity of field service offices justify 53 field offices across the country;
6. Determine whether the population and location of where railroad employees (both currently employed in railroad service and retired railroad employees) reside justify 53 field offices across the country;
7. Determine the optimal number of field service employees that are needed to address the needs and locations of the railroad community; and
8. Identify technological improvements for field service to address customer service needs, including those that can be addressed virtually or remotely.

Scope

The scope of the audit was the review of the RRB's organizational structure and the 53 field offices for fiscal years 2019 through 2021.

Methodology

To address and accomplish the audit objectives, we used the following evidence-gathering and evidence-analysis techniques:

- Identified criteria from applicable laws, regulations, guidance, policies, and procedures, including from the Government Accountability Office’s (GAO) *Standards for Internal Control in the Federal Government* (Green Book);²
- Identified criteria from RRB internal guidance;
- Reviewed prior Office of Inspector General (OIG) audit findings;
- Reviewed agency documentation, as needed to address the audit objectives;
- Performed audit procedures to address the audit objectives in accordance with Generally Accepted Government Auditing Standards;³
- Interviewed applicable management, staff, and key personnel;
- Determined the types of documents (and annual volume per type) processed in person at the field offices to identify documents that could be filed online, over the phone (with certifications), or through the mail;
- Assessed the reliability of call data and statistics for Field Service, including the determination of the source of call volume data statistics; and
- Reviewed criteria post fiscal year 2021 to consider and determine future requirements and best practices.

The overall strategy and methodology of our audit considered the following criteria.

Effective Date	Criteria
August 11, 2023	Section 85.5: <i>What should be the basis for my personnel estimates</i> of the Office of Management and Budget (OMB) Circular A-11 ⁴ addressed budget preparation for federal agencies and specifically provided guidance regarding full-time employee (FTE) requirements and determining FTE usage.
July 20, 2022	OMB Memorandum titled <i>FY 2024 Agency-wide Capital Planning to Support the Future of Work</i> ⁵ required federal agencies to restart their annual planning process and resubmit their plans for fiscal years 2024 to 2028 by December 16, 2022. The memorandum also identified guidance for how a federal agency should determine its plan for the future of work, which RMA considered when assessing the effectiveness and efficiency of field offices.

² Green Book, GAO-14-704G, September 10, 2014.

³ Government Auditing Standards, GAO-21-368G, April 2021.

⁴ OMB Circular No. A-11 *Preparation, Submission, and Execution of the Budget*, August 11, 2023.

⁵ OMB Memorandum M-22-14, *FY 2024 Agency-wide Capital Planning to Support the Future of Work*, July 20, 2022.

Effective Date	Criteria
December 13, 2021	The Biden Administration issued <i>Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government</i> ⁶ that stipulated that the executive branch requires federal agencies to minimize inefficiencies to U.S. customers. RMA considered this executive order when assessing the locations of field offices, the optimal number of employees, and technological improvements to address customer service needs.
December 6, 2021	RRB issued their telework policy as part of Administrative Circular HR-11. ⁷ The circular detailed general provisions for telework as well as management and employee responsibilities.
November 2021	The U.S. Office of Personnel Management (OPM) issued the <i>2021 Guide to Telework and Remote Work in the Federal Government</i> , ⁸ which provided the Biden Administration’s encouragement towards a more prevalent remote work landscape post pandemic. The guidance included comprehensive guidelines for restructuring to a remote model and considerations the agency should make before transitioning to remote work.
November 2021	The Biden-Harris Management Agenda Vision ⁹ detailed the Administration’s mandates on real estate used by federal agencies and how they anticipate it will affect how and where federal employees work.
June 10, 2021	OMB Memorandum titled <i>Integrating Planning for A Safe Increased Return of Federal Employees and Contractors to Physical Workplaces with Post-Reentry Personnel Policies and Work Environment</i> ¹⁰ provided policies for agencies as they reentered an in-person work environment and required them to reevaluate policies to account for a post-covid environment, which RMA considered when issuing recommendations concerning structural and organizational changes.
November 6, 2019	OMB Memorandum titled <i>Implementation of Agency-wide Real Property Capital Planning</i> ¹¹ provided guidance on capital planning requirements that were in effect during the scope of the audit. It required that each agency detail the capital planning process that the agency developed and ensure that those plans were consistently implemented.

⁶ *Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, Section 2. Policy, December 13, 2021.

⁷ RRB Administrative Circular HR-11 *Telework Policy*, December 6, 2021.

⁸ OPM, *2021 Guide to Telework and Remote Work in the Federal Government*, Part 2, November 2021.

⁹ The Biden-Harris Management Agenda Vision Priority 1; Strategy 3, November 2021.

¹⁰ OMB Memorandum M-21-25, *Integrating Planning for A Safe Increased Return of Federal Employees and Contractors to Physical Workplaces with Post-Reentry Personnel Policies and Work Environment*, Section III.A Section IV.A, B.2, June 10, 2021.

¹¹ OMB Memorandum M-20-03, *Implementation of Agency-wide Real Property Capital Planning*, Section 1, November 6, 2019.

Effective Date	Criteria
June 28, 2019	OMB Memorandum titled <i>Transition to Electronic Records</i> ¹² directed federal agencies to transition recordkeeping to a fully electronic environment that complies with all records management laws and regulations by December 31, 2022.
March 2017	The OPM <i>Workforce Reshaping Operations Handbook</i> ¹³ provided guidance and operational procedures for restructuring federal agencies. It included guidelines for developing mission requirements and steps that should be taken if a reduction in force is deemed necessary. RMA considered this report when assessing technological improvements, both virtual and in-person, that could be made to address customer service needs.
December 12, 2016	OPM Rules and Regulations: Personnel Management in Agencies ¹⁴ aligned human capital management practices to broader agency strategic planning activities and enabled management to better leverage the workforce to achieve results. RMA considered this report when assessing the optimal number of field service employees and technological improvements that could be made to field service.
Spring 2015	The Obama Administration issued the National Strategy for the Efficient Use of Real Property, ¹⁵ which provided guidance for the improvement of management and use of federal assets, which RMA considered when issuing recommendations concerning structural and organizational changes.
March 25, 2015	OMB Management Procedures Memorandum No. 2015-01 ¹⁶ described OMB's goals for agency footprint reduction targets from fiscal years 2016 to 2021 and provided a useful precedent for the government's mission for office and warehouse usage pre-pandemic.
September 10, 2014	The GAO <i>Standards for Internal Control in the Federal Government</i> ¹⁷ (Green Book) sets the standards for an effective internal control system for federal agencies and provides the overall framework for an effective internal control system. The standards in the Green Book are organized by five components of internal control.
August 11, 2000	The Presidential Executive Order 13166 of August 11, 2000 ¹⁸ provided federal Limited English Proficiency (LEP) requirements to improve LEP access for LEP applicants and LEP beneficiaries of government-funded programs.

¹² OMB Memorandum M-19-21, *Transition to Electronic Records*, June 28, 2019.

¹³ OPM, *Workforce Reshaping Operations Handbook*, issued March 2017, Chapter I: Section A, B, C, D, Chapter III: Section M.

¹⁴ OPM, Personnel Management in Agencies, 5 CFR §250.204, December 12, 2016.

¹⁵ National Strategy for the Efficient Use of Real Property 2015-2020, Spring 2015.

¹⁶ OMB Management Procedures Memorandum No. 2015-01, *Implementation of OMB M-12-12 Section 3: Reduce the Footprint*, March 25, 2015.

¹⁷ Green Book, GAO-14-704G, September 10, 2014.

¹⁸ Executive Order 13166, August 11, 2000.

Effective Date	Criteria
Established: June 25, 1938 Amended: October 9, 1996	The Railroad Unemployment Insurance Act (RUIA) ¹⁹ provided the legislation that informed the agency’s primary mission to provide accurate and timely benefits to railroad employees.
Established: June 24, 1937 Amended: October 16, 1974	The Railroad Retirement Act (RRA) ²⁰ provided monthly retirement/survivor annuities for railroad employees and their families based on age and service, death, or on disability.

We assessed and documented the reliability of RRB’s computer processed data as part of the review of the audit objectives. RMA found instances of inaccurate data related to telecommunications information. Due to the inaccuracy of the telecommunications data and its impact on our ability to address the audit objectives, RMA concluded that RRB’s data was not sufficiently reliable for this audit. However, RMA found that the customer population reports data was accurate and allowed our team to sufficiently analyze RRB’s customer population. RRB’s Bureau of the Actuary and Research (BAR) team had controls in place to validate the data in the reports.

We conducted this performance audit in accordance with the generally accepted government auditing standards.²¹ 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 conducted our fieldwork at RMA headquarters in Arlington, Virginia from July 2022 through August 2023. We conducted site visits at RRB’s field offices in Chicago, Cleveland, Scranton, and Denver in January 2023 to validate our analysis.

Background

RRB is an independent agency in the Federal Government’s Executive Branch created in the 1930s, that provides insurance benefit programs to railroad workers and their families under RRA²² and RUIA.²³ During the 1930s, railroad workers young and old were faced with increasing uncertainty about their job security and pension plans. Under President Franklin D. Roosevelt, the RRA of 1935 was created. RRB served to administer benefits and income protection provided

¹⁹ RUIA, October 9, 1996.

²⁰ RRA, October 16, 1974.

²¹ Government Auditing Standards, GAO-21-368G, April 2021.

²² RRA, October 16, 1974.

²³ RUIA, October 9, 1996.

under the two acts, such as retirement benefits, unemployment insurance, and sickness insurance, in case of death or disability.

The RRB's mission is to administer retirement/survivor and unemployment/sickness insurance benefit programs for railroad workers and their families under the Railroad Retirement Act (RRA) and the Railroad Unemployment Insurance Act (RUIA). These programs provide income protection during old age and in the event of disability, death or temporary unemployment and sickness. The RRB also administers aspects of the Medicare program and has administrative responsibilities under the Social Security Act and the Internal Revenue Code. In carrying out our mission, the RRB will pay benefits to the right people, in the right amounts, in a timely manner, and will take appropriate action to safeguard our customers' trust funds. The RRB will treat every person who comes into contact with the agency with courtesy and concern, and respond to all inquiries promptly, accurately, and clearly.

RRB's organizational structure is led by a three-member Board appointed directly by the President and consists of four bureaus, three offices and an Office of Equality Opportunity. Hereafter, RMA will refer to the bureaus and offices within RRB as "units." RRB staffing consisted of more than 750 employees as of September 2021. We have provided a brief overview of RRB's seven units below:

- **Office of Programs (OP)** – coordinates direct services to RRB beneficiaries and all claims processing operations. This bureau has five subordinate sections consisting of Policy and Systems, Program Evaluation and Management Services (PEMS), Retirement-Survivor Benefits; Disability Benefits; and Unemployment and Programs Support.
- **Bureau of Information Services (BIS)** – directs and leads the strategic management of RRB's information technology resources and provides information technology services for the agency and maintains agency systems. It has five subordinate units consisting of Policy and Compliance, Infrastructure Services, Enterprise Applications, IT Strategy and Technology Management, and Risk Management.
- **Office of Administration (OA)** – provides management and administrative support services for the agency. It has four subordinate sections consisting of Human Resources, Public Affairs, Acquisition Management, and Real Property Management.
- **Bureau of Fiscal Operations (BFO)** – provides agencywide financial accounting, budgeting, contribution collection and reconciliation, tax reconciliation, and accounts payable. It has three subordinate sections consisting of Accounting and Budget, Treasury, Debt Recovery, Financial Systems, and Audit and Compliance.
- **Office of General Counsel** – provides legal and legislative services for the agency. This bureau has three subordinate sections. The Bureau of Hearings and Appeals reviews appeals and conducts hearings for individuals who disagree with the decisions reached in their case. The Office of Legislative Affairs provides liaison services. The Secretary to the Board supports the three-member Board.

- **Bureau of the Actuary and Research** – provides actuarial and statistical information on employees, employers, and beneficiaries, and financial information on the trust funds. This bureau has two subordinate sections consisting of the Division Benefits and Employment Analysis and the Financial Interchange Division.
- **Bureau of Field Service** – provides all aspects of customer relations on behalf of the agency. This bureau has 53 field offices across the United States to provide customer service in person and by telephone to railroad employees, railroad retirees, and their families. This bureau handles inquiries pertaining to retirement and survivor benefits, Railroad Medicare, Social Security benefits, tax withholdings, sickness and unemployment benefits, and unemployment application claims. During fiscal year 2020, this bureau had 205 employees. In RRB’s fiscal year 2022 Justification of Budget Estimates, RRB stated that BFS had a 27% staffing deficit that had negatively impacted customer service. They also indicated that due to staffing shortages, calls answered by field service staff declined to 35% in fiscal year 2020 from 54% in fiscal year 2015, while call volumes of approximately 1.2 million remained constant. Railroad employees, railroad retirees, and their families can call a field office, or they can call the national toll-free service number. In addition, BFS reported that approximately 29% of their staff will be eligible to retire in the calendar years 2021 through 2024. In its fiscal year 2023 Justification of Budget Estimates, RRB reported 57 separations from field service in calendar year 2021 into February 2022 and the onboarding of 48 claims representatives. Of the recently onboarded staff, 30 were funded by using a portion of the \$6.8 million RRB received from pandemic relief legislation. BFS acknowledged that the pandemic relief legislation funding was temporary, so they cited the need for additional funds to hire more staff and maintain the increased staffing levels.

Results of Audit

While RMA identified various areas for improvement within the organization’s structure and field service operations, RMA found no exceptions within two objectives, specifically **Objectives 4** and **6**. In **Objective 4**, RMA found that BFS successfully maintained efficiency and effectiveness of operations during the scope of this audit. In **Objective 6**, RMA found that the population and location of railroad customers justified the locations of the existing 53 field offices.

In the following paragraphs, we summarized the results of the audit by objective. Additional details regarding findings and supplemental information are presented in the subsequent sections and appendices.

Objective 1: RMA found that the RRB’s organizational structure itself did not impede the agency’s primary mission, cross organizational communications, or transactional flows. However, cross organizational communications needed improvement, and policies and procedures for customers with LEP needed to be developed, documented, and implemented.

Objective 2: Since RMA found that RRB’s organizational structure was not the issue, and because RRB’s cost data was incomplete, RMA could not develop models for the organizational changes

needed. However, RMA identified the following changes that should help to improve the efficiency of RRB operations:

- RMA found that to improve BFS's efficiency, BFS should 1) document its lessons learned from the COVID-19 pandemic and plan for the future of RRB's 53 field offices in support of OMB M-22-14²⁴ and 2) consider instituting a quota for field office calls per day to benchmark and standardize employee work.
- Regarding technological improvements, RRB should 1) explore potential process improvements to address customers' inability to check their claim statuses or change their personal information and 2) consider centralized printing, scanning, imaging, and faxing capabilities in field offices.
- RMA concluded that to improve effectiveness, BFS should 1) assign disability casework in all 12 field service networks to ensure even distribution of difficult cases and 2) measure effectiveness at the field office level rather than at the bureau level.

Objective 3: RMA found that the RRB's available resources were not sufficient to accurately determine the total operational and rental cost for each of the 53 field offices in BFS (**Appendix B: Operating Costs for Field Offices**).

Objective 4: RMA defined effectiveness as the percentage of goals established by BFS that were achieved on an annual basis. A chart detailing these goals can be found in **Appendix C: Effectiveness of the Field Offices**. In addition, RMA concluded that efficiency at BFS increased slightly from fiscal year 2019 to fiscal year 2020 but returned to fiscal year 2019 levels between fiscal years 2020 and 2021. RMA defined efficiency as the work output²⁵ by each field service employee in a given fiscal year.

RRB's BFS was as efficient and as effective in fiscal year 2019 as fiscal year 2021. This highlighted that the hybrid telework policy did not hinder the efficiency or effectiveness of the field service offices.

Objective 5: Our analysis showed that although RRB's BFS had an increase in employees from fiscal year 2019 to fiscal year 2021, the increase in employees did not result in a significant increase in customer interactions at the field office level. Additionally, there was a significant decrease in quantifiable productivity per field service employee per day from fiscal year 2019 to fiscal year 2021.

²⁴ OMB Memorandum M-22-14, *FY 2024 Agency-wide Capital Planning to Support the Future of Work*, July 20, 2022.

²⁵ Work output refers to the recorded tasks completed by field service employees (e.g., addressing calls and walk-ins, entering sickness and unemployment claims, interviewing claimants as necessary, updating claimant information).

During the pandemic, field offices did not offer in-person appointments but had one employee in the office handling administrative tasks that could not be completed from home. This arrangement continued with the hybrid schedule.

RMA determined that productivity based on calls, walk-ins, and quiet time²⁶ were deflated and should be interpreted as the minimum time that employees in each field office worked directly with the railroad community (**Appendix D: Productivity of the Field Offices** and **Appendix E: Location of Customers**). Other time spent at work was not quantified nor included in the productivity reports of the 53 field service offices. This included time spent on training, emails, faxes, mail, and after-call work (e.g., gathering and mailing applications for Railroad Medicare cards and certifications). Without the ability to quantify the entirety of a field office's productivity, RMA could not determine if the productivity justified the continued operation of the 53 field offices.

Objective 6: As of April 2023, RMA determined that the population and location of where railroad employees reside did justify 53 field offices across the country because of the 1) correlation between the number of customers within a commuting distance of a field office and the number of walk-ins (**Appendix E: Location of Customers**) and 2) impact to the customer of closing an office based on feedback from similar agencies.

While our analysis demonstrated that field offices with more customers in a 50-mile radius received more walk-in appointments, it should not be considered the sole justification for field offices. Our analysis did not account for the entirety of the work performed in field offices but rather provided insight into the utilization of walk-in appointments at field offices.

In addition, RMA determined that a few field offices were located within a commuting distance of 50 miles²⁷ of each other, which resulted in double coverage for individuals in those areas. These field offices are New York and Central Islip, NY; Newark, NJ; and Chicago and Joliet, IL.

With the limited number of walk-ins in comparison to the total work output, RRB should reevaluate the 53 field offices when leases expire by focusing on those field offices with the least number of customers within commuting distance of the field office (**Appendix E: Location of Customers**).

As stated in our Objective 5 summary, certain elements of the work performed in field offices could not be completed remotely with the current technological construct. The adoption of new technological improvements and the associated policies and systems could allow for the entirety of the work to be completed remotely. These improvements were not in place at the time of this

²⁶ Quiet time refers to a period during the day, often 1 to 2 hours, in which employees complete administrative tasks or process casework without appointments or handling calls.

²⁷ A commuting distance of 50 miles was set as the standard for the threshold distance a railroad customer would commute to a field office as defined by the IRS in the Internal Revenue Manuals Part 1, Chapter 32, Section 1: IRS Local Travel Guide.

audit. Additionally, RMA found that the data surrounding costs and call data was unreliable and thus not factored into our assessment of Objective 6.

Our recommendations concerning technological advancements can be found in **Technological Improvements and Modernization are Needed** and our recommendations concerning cost and call data can be found in **Optimal Number of Field Service Employees to Support the Railroad Community's Call Demand is Unknown** and **Lack of Supported Cost Breakdowns for RRB's 53 Field Offices**.

Objective 7: Based on available and quantifiable data, RMA determined that the minimum number of full-time field service employees to address the needs and locations of the railroad community was 135 in 2019, 126 in 2020, and 124 in 2021 (**Appendix F: Calculated Number of Field Office Employees, Table 7**).

RMA determined that the number of full-time field service employees based on a quota of 16 calls per day per FTE required to address the needs and locations of the railroad community was 160 in 2019, 164 in 2020, and 144 in 2021 (**Appendix F: Calculated Number of Field Office Employees, Table 8**).

RMA determined that the maximum number of full-time field service employees needed to address the needs and locations of the railroad community were 207, 205, and 226 for the years 2019, 2020, and 2021, respectively (**Appendix F: Calculated Number of Field Office Employees, Figure 3**). Please note, RRB management was unable to provide accurate data on the total number of unanswered calls during business hours and therefore, RMA was not able to factor how the total call volume demand would have impacted the optimal number of field service employees. The inability to accurately calculate or validate the demand of calls did not allow RMA to estimate the maximum number of FTEs beyond the current number of FTEs.

Objective 8: Based on the insight from internal and external sources, RRB should use this information to make policy or training changes to address the following issues in RRB's BFS.

1. Increase customer education regarding options to deliver certified copies of proofs (e.g., marriage, divorce, or birth certificates) to RRB field offices.
2. Increase availability of traveling BFS representatives who can meet customers at union meetings to decrease time traveling to field offices to deliver their proofs.
3. Increase customer awareness of the ability to file proofs early to expedite retirement processes.
4. Change RRB BFS's official policy to allow submission of RRB customers' unemployment and sickness applications and claims forms via fax and/or email to decrease administrative burdens of mailing documents. (Both the Social Security Administration (SSA) and the U.S. Department of Veterans Affairs (VA) reported accepting electronic signatures, and no longer requiring doctor's wet signatures to process benefits).

RMA also recommends that RRB create detailed project plans to expend information technology modernization funds on the following technological advancements to better serve its customers and carry out the agency's primary mission.

1. Using insight from the VA's design and implementation strategies of their online Veteran Benefits Administration (VBA) benefits for veterans, develop project plans to increase online availability of advanced, comprehensive online system to include online RUIA and RRA applications.
2. Using insight from the VA's transition to a paperless environment, develop project plans to centralize printing, imaging, and scanning, after building a database and central repository to store RRB customer data.
3. Using secure login credentialing services such as Login.gov and ID.me, develop a project plan to allow RRB customers to change their personal information (e.g., home address, direct deposit) and request Railroad Medicare cards.

RMA initially recommended that BFS include a 1) feasibility study into developing a centralized portal for printing, scanning, and imaging; 2) feasibility study into building a database and central repository for data storage; and 3) course of action to allow customers to view their application status online as well as update personal information online.

BFS acknowledged these recommendations and stated that they had already taken steps to address these issues. Specifically, BFS stated that they have leveraged third-party partners to centralize imaging and scanning. RRB also invested in procuring the tools and services necessary to begin unifying beneficiary data in a central database and has developed a roadmap to modernize their benefit payment systems. Additionally, management stated that RRB has successfully modernized and secured its infrastructure systems and is now focused on updating its legacy Common Business Oriented Language (COBOL) applications to begin improving customers' experience in accordance with current Presidential executive orders.

Regarding aspects of RRB's organizational structure and field service operations, RMA had seven findings:

1. OA Did Not Comply with Agencywide Capital Planning Requirements;
2. Optimal Number of Field Service Employees to Support the Railroad Community's Call Demand is Unknown;
3. Lack of Inter-Unit Communication;
4. Lack of Documentation of Lessons Learned from the COVID-19 Pandemic;
5. Lack of Policies and Procedures for Customers with LEP;
6. Technological Improvements and Modernization are Needed; and
7. Lack of Supported Cost Breakdowns for RRB's 53 Field Offices.

We provide additional details on these seven findings in the following sections, including actionable recommendations.

OA Did Not Comply with Agencywide Capital Planning Requirements

RRB's OA did not create an agencywide capital planning report as required by OMB.

According to OMB M-20-03,²⁸ executive agencies were required to provide their capital plans to the Federal Real Property Council (FRPC) by August 15 of each year beginning in 2020. The agency's Senior Real Property Officer, Chief Financial Officer, and Budget Officer were jointly responsible for developing the capital planning process, integrating it into the agency's annual budget formulation cycle, monitoring its execution, and analyzing cost and performance information. The capital plan the agency submits to FRPC annually must include:

- Mission requirements for real property;
- Chief Financial Officer (CFO) and Senior Real Property Officer (SRPO) responsibilities;
- Annual budget process;
- Identify major Lines of Business;
- Needs assessment;
- Alternatives analysis;
- Prioritization process;
- Life cycle cost estimate;
- Performance goals and metrics; and
- List of projects.

On August 6, 2021, OMB paused the M-20-03²⁹ annual requirement to complete a capital plan due to the COVID-19 pandemic. On July 20, 2022, OMB issued M-22-14.³⁰ According to OMB M-22-14,³¹ executive agencies were required to restart their annual planning process by developing and submitting their fiscal year 2024 – 2028 capital plans to OMB and the FRPC no later than December 16, 2022. Agencies subject to the Chief Financial Officers Act of 1990 (CFO Act agencies) were required to submit their annual agencywide real property capital plan by December 16, 2022. Non-CFO Act agencies were also required to complete their capital plan by that date but were not required to submit it to OMB. The RRB is a Non-CFO Act agency.

²⁸ OMB Memorandum M-20-03, *Implementation of Agency-wide Real Property Capital Planning*, November 6, 2019.

²⁹ Ibid.

³⁰ OMB Memorandum M-22-14, *FY 2024 Agency-wide Capital Planning to Support the Future of Work*, July 20, 2022.

³¹ Ibid.

OMB M-22-14³² “addresses agencies’ real property resource needs and agency efforts to define the amount and types of real property required to fully implement the future of work at each agency.” Specifically, the memorandum asks agencies to consider:

- Workspace/workplace usage and mobility assessments, and opportunities to integrate remote work and sharing of spaces among federal agencies into mid- and longer-term real estate/property strategies;
- Broader workforce and workplace trends, lessons learned from agency operations during the COVID-19 pandemic, and the need for the Federal Government to be competitive for top talent as employers in the broader labor market;
- Real property resources required for the immediate post-reentry workplace environment and in the future of work context;
- Future physical space requirements, the agency’s mission and customer needs, the current and future workforce, and impacts on local communities; and
- Lessons from the COVID-19 pandemic, as well as nationwide workforce and workplace trends (e.g., hybrid work inclusive of onsite work, telework, alternative work schedules, online collaboration, and remote work policies and practices).

For fiscal years 2019 through 2021, the RRB’s OA failed to create an agencywide capital plan in accordance with OMB M-20-03³³ because the RRB was not aware of the guidance and data call resulting from OMB M-20-03,³⁴ which were issued under the tenure of the prior Director of Administration who had retired.

For fiscal year 2022, the RRB’s OA failed to create an agencywide capital plan in accordance with OMB M-22-14³⁵ because RRB management stated that during a meeting, OMB verbally exempted RRB from creating an agencywide capital plan for fiscal years 2024 – 2028 based on the creation of the relocation plan for RRB’s headquarters. The OA was under the assumption that the headquarters’ relocation plan could be created in lieu of an agencywide capital plan. RRB management was unable to provide documentation supporting this exemption. RRB management confirmed that there was no written evidence of this agreement as it was a verbal agreement between RRB management and OMB examiners. The meeting took place on August 10, 2022. During the course of the audit, OA agreed with the situation and plans to coordinate with BFO and BFS and take the necessary actions to complete the development of a capital plan by August 1, 2024.

³² Ibid.

³³ OMB Memorandum M-20-03, *Implementation of Agency-wide Real Property Capital Planning*, November 6, 2019.

³⁴ Ibid.

³⁵ OMB Memorandum M-22-14, *FY 2024 Agency-wide Capital Planning to Support the Future of Work*, July 20, 2022.

Additionally, we were unable to obtain the RRB's last agencywide capital plan that complied with OMB requirements. According to the RRB's OA, an agencywide capital plan had never existed, and they did not have one.

As a result of not creating an OMB compliant plan, the OA failed to consider 52 of its 53 field offices in its agencywide capital planning. The OA did not consider the usable amount of square footage in real estate, the rent costs, and other operating costs used to keep these 52 field offices open.

The RRB OA's lack of consideration of its 52 field offices failed to address RRB's real property needs and define the amount and types of real property required to implement future requirements. This oversight fails to apply lessons learned from the COVID-19 pandemic such as increased telework capability and a reduction in physical space that impacts BFS's ability to serve current and future customer needs.

Recommendations

RMA recommends that the Office of Administration:

1. Work with the Bureau of Field Service to create an agency wide capital planning report for fiscal years 2024 – 2028 that includes all field offices (in addition to headquarters) and addresses all considerations required by the Office of Management and Budget's latest Memorandum M-22-14.
2. Adequately document exemptions of the Office of Management and Budget's memorandums related to the agencywide capital planning requirement.

Management's Comments and RMA's Response

OA partially concurred with recommendation one, which RMA evaluated as a non-concurrence for reporting purposes.

OA explained it will consider RRB's field offices in the capital planning process; but did not agree that headquarters should be included because RRB is in the process of relocating their headquarters. According to the OA, the move will not be completed until after fiscal year 2028 and is out of scope of the capital planning report. RMA determined that this reasoning is insufficient to exclude headquarters from the capital planning report. RMA's evaluation of OA's response and planned corrective action partially addressed the identified issues outlined in this report. OA must work in coordination with BFS and OMB to fully meet the intent of this recommendation. Our finding and recommendation remain as written.

OA concurred with recommendation two and provided an estimated completion date of September 30, 2024. OA provided a target completion date that meets the intent of promptly implementing audit recommendations.

Optimal Number of Field Service Employees to Support the Railroad Community's Call Demand is Unknown

RRB's BFS could not calculate or determine the optimal number of field service employees needed to support customer service phone calls from the railroad community, including optimal efficiency (**Appendix D: Productivity of the Field Offices**).

According to the Green Book,³⁶ Section 11.09, *Design of Information Technology Infrastructure*, “[m]anagement designs control activities over the information technology infrastructure to support the completeness, accuracy, and validity of information processing by information technology. Information technology requires an infrastructure in which to operate, including communication networks for linking information technologies, computing resources for applications to operate, and electricity to power the information technology. An entity's information technology infrastructure can be complex. It may be shared by different units within the entity or outsourced either to service organizations or to location-independent technology services. Management evaluates the objectives of the entity and related risks in designing control activities for the information technology infrastructure.”

According to OMB Circular No. A-11: *Preparation, Submission, and Execution of the Budget*,³⁷ Section 85.5: *What should be the basis for my personnel estimates*, requires that:

- (a) FTE requirements: “Agencies have the flexibility to manage their FTE levels, within their budget constraints, and to determine how many FTEs are required to successfully accomplish their mission...Agency submissions should include supporting data to justify and validate those FTE estimates.”
- (b) Determining FTE usage: Agencies must prepare budget estimates relating to personnel requirements in terms of FTE employment as specified in the Circular.

The BFS could not determine the optimal number of field service employees needed for its call demand because of inaccurate data. Specifically, RMA determined the inaccurate data stemmed from:

- manually inputted and/or calculated telecommunications data and analysis;
- nonexistent review process to verify the completeness, accuracy, and validity of the telecommunications information;
- lack of documentation of how telecommunication reports are generated; and
- inability to provide an accurate percentage of calls answered and call demand.

³⁶ Green Book, GAO-14-704G, September 10, 2014.

³⁷ OMB Circular No. A-11 *Preparation, Submission, and Execution of the Budget*, August 2011.

For example, in reviewing the BFS's telecommunications data for the 53 field offices for fiscal years 2019, 2020, and 2021, RMA determined that the totals for "Hold Time"³⁸ in the telecommunications data contained 159 instances of inaccurate totals for the Total Hold Time.

The BFS's inability to determine the optimal number of field service employees needed for its call demand could directly impact the needs of the railroad community (i.e., phone calls could go unanswered, individuals could be put on hold for extended periods, or individuals could elect to walk-in to a field office unnecessarily).

RMA determined that the fiscal year 2021 telecommunications data reported for the Fiscal Year 2023 Budget Justification Report³⁹ was inaccurate. RRB management stated that for reports prior to September 2021, the percentage of calls answered reported in the Budget Justification was inaccurate because the percentage included unanswered calls outside of business hours. RRB was unable to reproduce the initial figures in the telecommunication reports including reports generated in the scope of the audit, fiscal years 2019 to 2021. Budget Justification submissions include data for the most recently completed year, the current year, and nine years following the budget year (outyears) to reflect budget decisions over the longer term. In addition to proposed appropriations for the budget year, the submissions may include proposed changes to appropriations for the current year (supplementals and rescissions) and legislative proposals that would affect the current year, the budget year, or the outyears. The submissions provide actual or estimated data by account that each agency may obligate the Government to pay (budget authority) and estimates of payments (outlays) by agency and account.

Despite the lack of accuracy in the available data, RMA's site visits to RRB's field offices in Chicago, Cleveland, Scranton, and Denver revealed that all field service workers observed were busy and engaged with RRB customer service for the entire duration of RMA's observation. RMA observed field service employees helping customers on the phone and walk-ins.

RMA acknowledges the Director of Field Service's proactive actions to correct these identified issues. The Director of Field Service explained to RMA that telecommunications data issues existed and were self-identified in fiscal year 2021 prior to the start of this audit. The Director further explained that BFS worked with applicable groups to develop and implement an accurate telecommunication data reporting process. This process was implemented in the first month of fiscal year 2022 to ensure data completeness, accuracy, and validity. RMA considers this a noteworthy action for BFS. However, the scope of this audit was fiscal years 2019 through 2021. After the final audit report is issued, BFS should submit a request for closure to the below recommendation. This request should include sufficient and appropriate documentation for the new process and proof that the new process has been effective since October 2022.

³⁸ Hold time in the FSO Agent Queue Annual report (Telecommunications Data) was defined as the total time a customer was on hold in the queue prior to an agent answering their call.

³⁹ RRB *Justification of Budget Estimates*, March 28, 2022.

Recommendation

RMA recommends that the Bureau of Field Service:

3. Implement and document a review process to verify the completeness, accuracy, and validity of the telecommunications data and analysis used to support telecommunications reports and Budget Justifications.

Management's Comments and RMA's Response

BFS did not concur with recommendation three with the following statement:

Non-concur. Field Service acknowledges the telecommunications data issue that was self-identified in FY21 and corrected with implementation in FY22, outside the scope of the audit. Field Service does not concur with the recommendation based on this agreed upon fact, and as stated by RMA, and consider it closed.

RMA evaluated BFS's written response to the audit draft report and determined the response was, in all practicality, the same as its response to RMA's notification of findings and recommendations provided to RRB during our fieldwork. RMA already considered and added the RRB's information to this report. Meeting the intent of the recommendation would correct future telecommunications data. As already explained in the finding, BFS should submit a closure request to the RRB OIG for an independent auditor's validation of the October 2022 review process. Our finding and recommendation remain as written.

Lack of Inter-Unit Communication

The RRB's communication between four of its seven primary units was lacking. RMA determined that the OP and the BIS failed to communicate with the BAR in messaging regarding changes potentially impacting the database applications. Additionally, RMA identified a need for increased inter-unit communication between the OP and BFS regarding case status updates and timelines.

RMA found that improvement was needed in communication between the OP, BIS, and BAR. RRB's BAR reported room for improvement in inter-unit communication. For example, BAR was concerned with the number of times they were left out of updates. BAR reiterated that when Programs and BIS made changes at the database level, it was crucial they informed BAR.

RMA found that improvement was needed in communication between the OP and the BFS. For example, employees from both the OP and the BFS reported room for improvement in communication between their two bureaus in messaging regarding case status updates and timelines.

The Green Book section OV3.04, Requirement O3.04⁴⁰ for entity management requires “establish[ment of] reporting lines within an organizational structure so that units can communicate the quality information necessary for each unit to fulfill its overall responsibilities.”

RRB’s communication between four of its seven units was lacking because RRB did not have set policies for how its primary units should communicate with one another. When RMA asked for policies and procedures describing inter-unit communication, RRB provided a communications chart to “aid in directing inquiries to headquarters.” RMA determined that the chart acted as a guide to direct internal or customer inquiries to the correct RRB office, bureau, and point of contact. The chart did not describe reporting lines across units nor which stakeholders should be involved and when.

A lack of communication between RRB’s units may have impacted RRB’s data analysis of key reports as well as customer dissatisfaction and longer call wait times in the BFS. A lack of communication may have resulted in missed deadlines, failure to share sufficient customer case updates, inaccurate data and reporting, and inefficiencies with individual units fulfilling their overall responsibilities. If correct timelines and updates were not communicated properly, there was a risk that customers were provided inaccurate information and updates regarding their case, which resulted in customers repeatedly calling about their case. These calls created a higher demand, longer wait times, and customer dissatisfaction.

BAR was responsible for periodically determining the actuarial soundness of the benefit systems and recommending changes in tax rates as needed, calculating the amount of the financial interchange with the social security system, and compiling reports, articles, and other tabular material for RRB publications. Therefore, a lack of communication between BAR, BIS, and OP may impact BAR’s analysis and calculations.

RMA acknowledges the Director of Programs’ proactive actions to correct these identified issues. The Director of Programs explained that BAR may not have been informed of the minor, front-end enhancement updates. However, any significant changes to policy or programs that could impact databases or BAR’s analysis function were appropriately shared with BAR staff. The Director further explained that there has been no instance where BAR analysis nor work products were negatively impacted due to a lack of communication between BAR and another Bureau. The Director indicated that OP would work with the Bureaus to develop a business process that will ensure BAR staff continues to receive timely information regarding changes that may impact their analysis.

The Director of Programs indicated that at the start of FY 2022, monthly executive leadership discussions were established between Field Service and OP to discuss major initiatives and business process changes. During the Spring of 2023, monthly collaborative leadership meetings were also established to address emerging issues. The Director further explained that OP is

⁴⁰ Green Book, GAO-14-704G, Section 3 – Evaluation of an Effective Internal Control System OV3.04, September 10, 2014.

developing a SharePoint site that will be used by OP to share critical information with all BFS employees.

In addition, the Director of Programs explained that during the scope of this audit, RRB's Executive Committee operated under a written charter that directed how primary units should communicate to ensure compliance with Section OV3.04 of the Green Book. The Board approved a new Executive Committee Charter on September 26, 2022, which was effective October 1, 2022.

However, the scope of this audit was fiscal years 2019 through 2021. Since these actions to address the identified issues were implemented outside the scope of this audit, OP should request closure of the recommendations below after the final audit report is issued. This request should include sufficient and appropriate documentation for the new processes and proof that the new process has been effective.

Recommendations

RMA recommends that the Office of Programs:

4. Create a communication improvement plan describing inter-unit communication flows between Railroad Retirement Board's Bureau of the Actuary and Research and other bureaus whose changes may impact the Bureau of the Actuary and Research's analysis.
5. Create a communication improvement plan describing inter-unit communication flows between Railroad Retirement Board's Office of Programs and the Bureau of Field Service.
6. Create a set of policies and or procedures for how the Railroad Retirement Board's primary units should communicate with one another to ensure compliance with Section OV3.04 of the Green Book.

Management's Comments and RMA's Response

OP did not concur with recommendation four with the following statement:

Non-concur. In addition to normal intercomponent communications with the Bureau of Actuary and Research (BAR), when the Office of Programs submits formal system change requests to the Bureau of Information Services (BIS), BAR receives a copy to ensure they are informed of any potential changes to our systems and/or databases.

For recommendation four, RMA evaluated RRB's response and determined that this policy could address the lack of sufficient communication as noted by BAR employees. As explained in the finding, OP should submit a closure request to the RRB OIG for an independent auditor's validation of this policy as RMA is aware that actions have been taken to address this finding outside the scope of our audit. Our finding and recommendation remain as written.

OP did not concur with recommendation five with the following statement:

Non-concur. We have a communications chart that is posted on our internal website, Boardwalk, which is reviewed and updated annually to inform Headquarters and Field Service (FS) of who to call for specific questions or issues. This communications chart has been posted on Boardwalk for over 10 years. Also, individual work units in Programs have group mailboxes to send case inquiries or address other issues.

For recommendation five, RMA evaluated RRB's response and determined it did not address the intent of the recommendation. As stated in our finding, RRB provided RMA with the communications chart during our fieldwork. While the chart served as a guide to direct internal or customer inquiries to the correct RRB office, bureau, and point of contact, it did not describe reporting lines across units nor which stakeholders should be involved and when. If this chart has been significantly modified since it was provided to RMA, OP should submit a closure request to the RRB OIG for an independent auditor's validation of the inter-unit communication flows. Our finding and recommendation remain as written.

RRB's Office of Programs did not concur with recommendation six with the following statement:

Non-concur. While the current Executive Committee Charter became effective October 1, 2022, the prior charter was signed April 26, 2000, which was within the scope of the audit period. It seems counterproductive to agree to an audit finding, which would require additional administrative actions to close post audit activity. We would be creating cumbersome nonproductive work when the policies and procedures were in place to resolve the alleged audit condition during the scope of the audit.

For recommendation six, RMA evaluated RRB's response and determined that the evidence provided was not sufficient to address the root cause of this finding. RMA had previously reviewed the Executive Committee Charter made effective on October 1, 2022, and determined it does not provide specific communication policies for how RRB's primary units should communicate with one another. If these policies have been made, they should be provided to the RRB OIG for an independent author's validation. Our finding and recommendation remain as written.

Lack of Documentation of Lessons Learned from the COVID-19 Pandemic

The RRB's BFS neither documented nor distributed its lessons learned from the COVID-19 pandemic to identify changes to improve the efficiency and effectiveness of RRB operations.

The Green Book Principle 3.03⁴¹ requires management to develop an organizational structure with an understanding of the overall responsibilities and assigns these responsibilities to discrete units to enable the organization to operate in an efficient and effective manner, comply with applicable

⁴¹ Green Book, GAO-14-704G, Principle 3.03, *Organizational Structure*, September 10, 2014.

laws and regulations, and reliably report quality information. Principles 14⁴² and 15⁴³ require that management communicate the necessary quality information to achieve the entity’s objectives both internally and externally.

OMB M-22-14,⁴⁴ issued July 20, 2022, “addresses agencies’ real property resource needs and agency efforts to define the amount and types of real property required to fully implement the future of work at each agency.” According to the memorandum, agencies should:

- consider lessons learned from agency operations during the COVID-19 pandemic, and
- consider the agency’s mission and customer needs, the current and future workforce, and impacts on local communities. As stated in the President’s Management Agenda, agencies are expected to reimagine their workplace approach informed by lessons from the COVID-19 pandemic, as well as nationwide workforce and workplace trends (e.g., hybrid work inclusive of onsite work, telework, alternative work schedules, online collaboration, and remote work policies and practices) and integrate these considerations into the next iteration of their capital plans completed under M-20-03.⁴⁵

During RMA’s site visits to four RRB field offices, field office employees reported an unofficial “relaxed” policy regarding the acceptance of sickness benefit applications and claims via fax and email that was instituted during the COVID-19 pandemic to ease customer burdens.⁴⁶ One field office reported that this method of accepting fax and emailed sickness benefit applications was not supposed to be in practice. RMA found that methods of accepting customer information for sickness benefits claims were inconsistent across field offices.

When RMA asked the BFS to provide lessons learned from the COVID-19 pandemic, we found none were officially documented. The BFS provided RMA an informal summary of lessons learned from the COVID-19 pandemic via email but was neither able to provide documentation nor proof of distribution of any lessons learned from the COVID-19 pandemic, internally or externally, to RRB stakeholders (including any lessons learned regarding the aforementioned “relaxed” sickness benefits policy to accept claims forms via fax or email in RRB field offices).

The BFS neither officially documented nor distributed lessons learned from the COVID-19 pandemic because BFS leadership was unaware of the requirements in OMB M-22-14.⁴⁷

As a result of BFS’s undocumented and undistributed lessons learned from the pandemic, some of the RRB’s 53 field offices continued to operate under the relaxed pandemic policy. These offices

⁴² Green Book, GAO-14-704G, Principle 14, *Communicate Internally*, September 10, 2014.

⁴³ Green Book, GAO-14-704G, Principle 15, *Communicate Externally*, September 10, 2014.

⁴⁴ OMB Memorandum M-22-14, *FY 2024 Agency-wide Capital Planning to Support the Future of Work*, July 20, 2022.

⁴⁵ OMB Memorandum M-20-03, *Implementation of Agency-wide Real Property Capital Planning*, November 6, 2019.

⁴⁶ The RRB Handbook (Page 71, column 2, paragraph 3) requires that sickness benefit applications must be mailed. The sickness benefit application was not available online.

⁴⁷ OMB Memorandum M-22-14, *FY 2024 Agency-wide Capital Planning to Support the Future of Work*, July 20, 2022.

continued to accept sickness and benefit applications and claims via delivery mechanisms that were against the RRB's policies.

RMA acknowledges the RRB's actions and considers them noteworthy. During the audit, the Director of Field Service explained that BFS and the agency had addressed some of the issues identified in this finding. Specifically, OP's Policy & Systems unit requested a legal opinion from the Office of General Counsel on January 19, 2023, to determine if field offices can continue to accept sickness benefit applications without a wet signature and via fax. In response, the Office of General Counsel issued the formal legal opinion on March 27, 2023, confirming that there are no specific RUIA regulations that require a wet-ink signature on sickness applications or would prevent the agency from accepting signed sickness applications via fax. Official policy guidance was issued in Instructional Memorandum 23-04 effective on March 30, 2023, and distributed to all field service employees. However, the scope of this audit was fiscal years 2019 through 2021. After the final audit report is issued, BFS should submit a request for closure to the associated recommendation. This request should include sufficient and appropriate documentation to validate the actions described by BFS.

Recommendations

RMA recommends that the Bureau of Field Service:

7. Document its lessons learned from the COVID-19 pandemic.
8. Distribute its documented lessons learned to all applicable Railroad Retirement Board units to help improve the efficiency and effectiveness of Railroad Retirement Board operations.
9. Determine the number of field offices that continued to accept faxed or emailed sickness benefit applications as of June 2023, and assess the impact of such actions.
10. Determine if an official policy change should be made regarding the submission of sickness and unemployment benefit applications and claims, based on COVID-19 pandemic lessons learned and an assessment of the impact of the relaxed COVID-19 pandemic policy.

Management's Comments and RMA's Response

BFS concurred with recommendation seven and stated that they will work with OA to comply with due dates in OMB Memoranda.

BFS did not concur with recommendation eight with the following statement:

Non-concur. The Criteria section of the finding which the recommendations are based, solely references OMB Memorandum M-22-14, which "requires agencies to restart their annual planning process by developing and submitting their FY 2024 – FY 2028 capital plans to OMB and the Federal Real Property Council". While the language directs agencies to "reimagine their workplace approach informed by lessons from the COVID-19 pandemic...and integrate these considerations into the next iteration of their capital

plans...”, there is no requirement in the memo to distribute any lessons learned. Additionally, lessons learned from Field Service (e.g. telework, relaxed signature policy) are inclusive to Field Service operations only; there is no applicability to other agency bureaus in this regard.

For recommendation eight, RMA evaluated RRB’s response and determined that development alone of these lessons learned without a plan to distribute them to employees hinders RRB’s ability to implement the changes identified as a result of the pandemic. OMB Memorandum M-22-14⁴⁸ asks agencies to consider lessons learned from the COVID-19 pandemic. If the intent of this memorandum is for agencies to consider how the pandemic affected their employees, then it is necessary for RRB to distribute these lessons learned. RRB agreed to recommendation seven to document lessons learned but this is insufficient as the only action taken. Our finding and recommendation remain as written.

BFS did not concur with recommendations nine and ten with the following statement:

Non-concur. Field Service also acknowledges the “relaxed” policy regarding the acceptance of sickness benefit applications and claims via fax and email that was instituted during the COVID-19 pandemic to ease customer burdens. Field Service collaborated with agency partners for the policy to become permanent, with official policy guidance issued to all employees on March 30, 2023. Field Service does not concur with the recommendation based on this agreed upon fact, and as stated by RMA, and consider it closed.

For recommendations nine and ten, RMA evaluated RRB’s response and based on a review of Instructional Memorandum 23-04, RMA determined that this policy meets the intent of the recommendations. As explained in the finding, BFS should submit a closure request to the RRB OIG for an independent auditor’s validation of the effectiveness of the policy. Our finding and recommendation remain as written.

Lack of Policies and Procedures for Customers with LEP

RRB’s BFS neither offered language assistance information online nor on the phone for RRB customers that had LEP.

According to Green Book, Principle 15⁴⁹ – Communicate Externally, Attribute 2, Appropriate Methods of Communication, Section 15.07, “[m]anagement selects appropriate methods to communicate externally. Management considers a variety of factors in selecting an appropriate method of communication. Some factors to consider are listed as follows:

- Audience – The intended recipients of the communication;

⁴⁸ Ibid.

⁴⁹ Green Book, GAO-14-704G, Principle 15, *Communicate Externally*, September 10, 2014.

- Nature of information – The purpose and type of information being communicated;
- Availability – Information readily available to the audience when needed;
- Cost – The resources used to communicate the information; and
- Legal or regulatory requirements – Requirements in laws and regulations that may impact communication.”

According to Presidential Executive Order 13166 of August 11, 2000,⁵⁰ “[e]ach Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.”

RMA identified a lack of awareness about language assistance resources within the agency. RRB’s BFS did not have adequate policies, procedures, and training materials in place to assist customers with LEP. RRB employees may not have the resources to properly assist customers with limited English proficiency. During the course of the audit, BFS proactively started to work with the RRB’s Acquisitions Management team to procure a contract to secure on-demand translating services for public-facing employees within the organization that supports the agencywide 2023 Language Access Plan approved by the Board in May 2023. Additionally, Field Service plans to partner with the RRB Office of Equal Opportunity to support this process and provide training to all field office employees. BFS plans to also collaborate with the RRB Office of Public Affairs to promote the service online and other public access avenues to increase awareness within the railroad community. However, at the time this report was written, customers with LEP may not receive correct or accurate information about their RRB benefits.

Recommendations

RMA recommends that the Bureau of Field Service:

11. Create policies and procedures for Railroad Retirement Board employees to assist customers with limited English proficiency.
12. Determine the amount of resources needed to assist customers with limited English proficiency.
13. Provide resources to employees to ensure access to language assistance resources.
14. Provide training for employees on how to assist customers with limited English proficiency.

⁵⁰ Executive Order 13166, August 11, 2000.

Management's Comments and RMA's Response

BFS concurred with recommendations 11, 13, and 14 and provided an estimated completion date of September 30, 2024. BFS provided a target completion date that meets the intent of promptly implementing audit recommendations.

BFS did not concur with recommendation 12 with the following statement:

Non-concur. Rather than pay for a lump sum of translations at a time based on estimations, Field Service will ensure the contract is a pay-as-you-go system for every translation done, similar to contracts with other agencies with public facing employees.

For recommendation 12, RMA evaluated RRB's response and determined that this action meets the intent of the recommendation. The recommendation did not require a lump sum payment but rather that RRB determine the resources needed to assist LEP customers. RMA acknowledges RRB's plan to obtain on demand translating services. Once the contract is established, BFS should submit a closure request to the RRB OIG for an independent auditor's validation that these services are provided to customers. Our finding and recommendation remain as written.

Technological Improvements and Modernization are Needed

As of July 2023, the RRB's BFS did not have a robust online services platform for its customers.⁵¹ RRB customers could not apply for retirement benefits or sickness/unemployment benefits nor designate changes of addresses or direct deposit information online.

RMA conducted interviews with RRB network managers, the VA, and the SSA to identify opportunities to improve the current RRB customer service processes.

Network managers explained that because of RRB BFS's hybrid schedule, one employee worked in the office to address imaging and printing for other employees working from home, as well as fielding walk-in customers at the front desk. Therefore, the employee working in the office handled fewer customer calls that day. When employees worked from home, they relied on employees working in the office to receive documents delivered via mail. As of April 2022, field service employees could work from home two days a week.

Another customer service issue that RRB network managers faced was the unavailability of advanced online systems to apply for benefits and track benefit statuses, to include the online processing of RUIA⁵² and RRA⁵³ applications.

⁵¹ In contrast, the Social Security Administration had the following online services available to customers: retirement applications, disability applications, Medicare benefit information, application statuses, change of address, and change of direct deposit.

⁵² RUIA, October 9, 1996.

⁵³ RRA, October 16, 1974.

The criteria used when assessing RRB's technological improvements and modernization include:

1. OMB Memorandum M-19-21: Transition to Electronic Records⁵⁴

Federal agencies are encouraged to consider cost-effective opportunities to transition-related business processes to an electronic environment in support of the President's Management Agenda and Reform Plan. This memorandum specifically focuses on records management and directs federal agencies to transition recordkeeping to a fully electronic environment that complies with all records management laws and regulations. This memorandum directs all federal agencies to:

- Ensure that all federal records are created, retained, and managed in electronic formats, with appropriate metadata; and
- Consistent with records management laws and regulations, develop plans to close agency-operated storage facilities for paper and other, analog records, and transfer those records to Federal Records Centers operated by National Archives and Records Administration (NARA) or commercial storage facilities.

2. Technological Advancements and Best Practices at the VA

Centralized Scanning: VA contracted a third-party vendor to scan mail. Paper files used by VA were also scanned by a third-party vendor into VA's system, which housed other records required for claims processing such as service records. At VA.gov, the agency had Veterans that used USPS and paper transmission, as well as an option for "quick submit" (a direct upload of their forms). The agency relied on professional services using vendor partnerships. VA used a centralized mail portal when instituting this process. The need for a centralized system was a lesson learned. VA had 56 field offices to RRB's 53 field offices, and though VA field offices handled different responsibilities than the RRB field offices, the centralized mailing and scanning duties allowed field office workers to focus on casework rather than scanning mail.

Acceptance of Electronic Signatures: VA did not require a wet signature on forms that needed a medical professional's signature. The agency accepted electronic signatures. The VBA had electronic signatures as part of the medical claims process and was documented in policies and procedures.

Self-Service Online Capabilities: VA had self-service online capabilities like a change of payment and a change of address.

3. Technological Advancements and Best Practices at the SSA

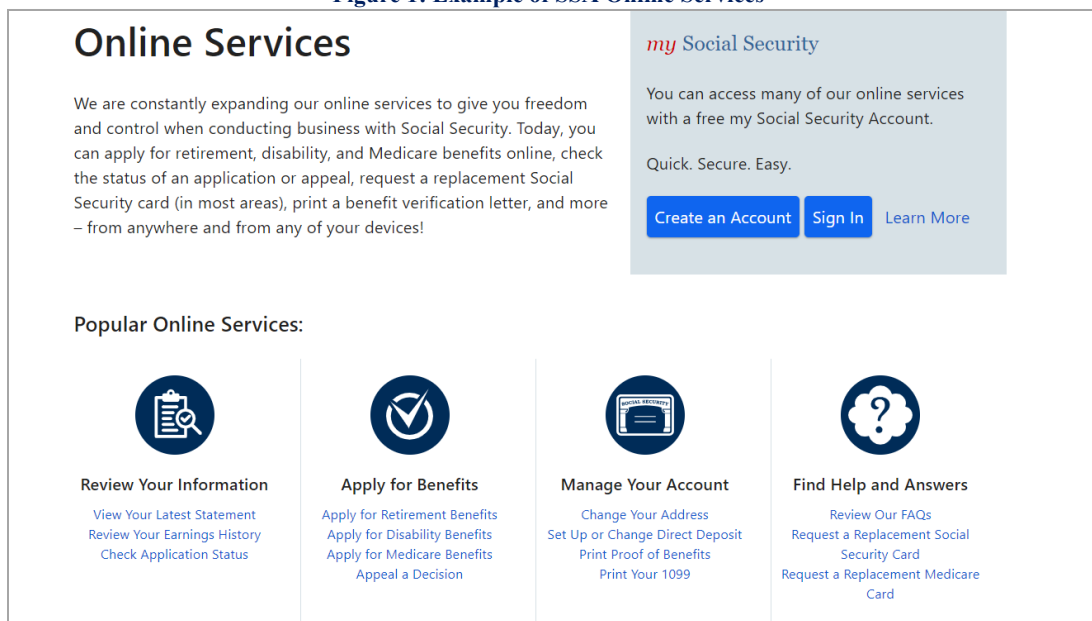
RMA also conducted an interview with representatives from the SSA but did not gain actionable items from the discussion. However, RMA reviewed SSA's online services

⁵⁴ OMB Memorandum M-19-21, *Transition to Electronic Records*, June 28, 2019.

available to the public and identified the following capabilities through their portal. An example of SSA's available online services portal is shown in **Figure 1**:

- View retirement benefit estimates at different ages or dates when you want to start receiving benefits;
- View spouse's benefits;
- Check the status of your application or appeal;
- Get a letter proving you do not receive benefits;
- Get your Social Security Statement, to:
 - View estimates of your future benefits;
 - Verify your earnings; and
 - View the estimated Social Security and Medicare taxes you have paid;
- Request a replacement Social Security card;
- Report your wages if you work and receive Social Security Disability Insurance and/or Supplemental Security Income benefits;
- Get your benefit verification letter;
- Check your benefit and payment information;
- Change your address and phone number;
- Start or change direct deposit of your benefit payment;
- Request a replacement Medicare card;
- Get a replacement SSA-1099 or SSA-1042S for tax season; and
- Opt out of receiving mailed notices for those available online.

Figure 1: Example of SSA Online Services⁵⁵



The RRB did have a 2018-2022 Strategic Plan that included technological improvements for items such as secure login credentialing services, online applications, viewing online application statuses, printing/imaging/scanning, and viewing personal information. However, RMA determined the RRB’s plan did not include improvements for changing personal information or requesting Railroad Medicare cards for the railroad community. Additionally, from fiscal year 2019 to 2021, the RRB’s BFS did not prioritize technological advancements at field service offices compared to similar agencies such as the VA or SSA. BFS did not have a detailed project plan to ensure implementation of the RRB’s Strategic Plan.

According to RRB’s BFS, the RRB’s yearly appropriation had not allowed the RRB to fulfill its mission nor modernize its systems and applications at the same time. BFS further explained that RRB must compete with other federal agencies for IT Modernization funding.

The lack of a robust, modern online service system resulted in:

- Field service staff struggling to keep up with call demand, some of which was associated with requests for changes in address or direct deposit information, resulting in long wait times;
- A burden on employees in the office that handled both imaging and printing for employees working from home and front desk duties, resulting in the handling of fewer customer calls; and

⁵⁵ Based on RMA’s analysis of the SSA website as of July 11, 2023.

- A burden on field service employees and the railroad community due to the high call volume and long wait times, thereby causing the customer representatives to make errors and mistakes as they rushed to process casework.

Recommendation

RMA recommends that the Bureau of Information Services:

15. Work with the Bureau of Field Service to develop and implement a detailed project plan to document and formally communicate project implementation steps to modernize RRB's technology to better serve its customers and carry out the agency's primary mission. At a minimum, the Bureau of Information Services should ensure the plan contains:
 - Insights from the Veterans Affairs' design and implementation strategies of their online Veteran Benefits Administration benefits;
 - A course of action to develop and increase availability of an advanced, comprehensive system to include online Railroad Unemployment Insurance Act and Railroad Retirement Act applications;
 - Insights from the Veterans Affairs' transition to a paperless environment; and
 - A course of action to ensure the use of secure login credentialing services for the railroad community such as Login.gov and ID.me.

Management's Comments and RMA's Response

BIS concurred with recommendation 15 overall, which RMA evaluated as a concurrence for reporting purposes.

Regarding duplication with GAO, RMA and GAO worked closely to ensure duplication did not occur. We facilitated status meetings and maintained email communication with the appropriate GAO points of contact to discuss the progress of each audit.

Regarding the jurisdiction of this finding and this recommendation, RMA evaluated BIS' response and understands the partnership required between bureaus to modernize the RRB's technology. As such, RMA modified its report to change the jurisdiction to BIS.

RMA's further evaluation of management's comments discovered that BIS dissected and relabeled the recommendation as 15(A), 15(B), 15(C), and 15(D) to address the four sub-bullets. BIS did not concur with two of the four sub-bullets related to including insight from Veterans Affairs in their plan due to the difference in staffing and budgets between the two agencies.

For the two sub-bullets that BIS non-concurred with, RMA evaluated BIS' response. RMA is not suggesting the replication of the Veterans Affairs' design and implementation strategies to improve their online capabilities and transition to a paperless environment. Given RRB is already

communicating with Veterans Affairs, we believe this will be beneficial in developing the detailed project plan. As such, RMA did not modify the recommendation because we are recommending that RRB include lessons learned from the VA in their project plan that may be applicable to RRB.

BIS did not provide an estimated completion date. In our subsequent communications, BIS stated “the recommendations we concurred with are subject to the availability of staff and funding resources. As those resources become available, the detailed plans for the projects approved by the Board will include planned completion dates.”

Lack of Supported Cost Breakdowns for RRB’s 53 Field Offices

For fiscal years 2019 through 2021, BFS management could neither determine the operating costs nor rent for its 53 field offices located across the continental United States. Specifically, BFS could not determine the cost of operating and staffing its individual field offices. Field office staffing ranged from one employee to eight employees.

For fiscal years 2019 through 2021, the RRB’s average yearly appropriation was approximately \$123.5 million. Of this amount, the average total cost for BFS was approximately \$24 million (**Appendix B: Operating Costs for Field Offices, Table 1**). BFS tracked the aggregate cost for the entire program.

- 1. OMB Memorandum M-21-25:⁵⁶ Integrating Planning for A Safe Increased Return of Federal Employees and Contractors to Physical Workplaces with Post-Reentry Personnel Policies and Work Environment**

Directs agencies to consider “workspace/workplace usage and mobility assessments, and opportunities to integrate remote work and sharing of spaces among Federal agencies into mid- and longer-term real estate/property strategies.” In making decisions regarding post-reentry personnel policies and work environments, agencies must be guided by how they can most effectively achieve their respective missions.

- 2. OMB Memorandum M-20-03:⁵⁷ Implementation of Agency-wide Real Property Capital Planning**

Heads of executive agencies are required to provide their capital plans to the FRPC by August 15 of each year beginning in 2020. The agency’s SRPO, CFO, and Budget Officer are jointly responsible for developing the capital planning process, integrating it into the agency's annual budget formulation cycle, monitoring its execution, and analyzing cost and performance information.

⁵⁶ OMB Memorandum M-21-25, *Integrating Planning for A Safe Increased Return of Federal Employees and Contractors to Physical Workplaces with Post-Reentry Personnel Policies and Work Environment*, June 10, 2021.

⁵⁷ OMB Memorandum M-20-03, *Implementation of Agency-wide Real Property Capital Planning*, November 6, 2019.

Implementation of an efficient and effective real property management strategy will ensure that agencies consistently implement sound capital planning practices to optimize their portfolio to achieve the agency's mission cost efficiently.

3. Green Book⁵⁸

Section 10.03

Management designs appropriate types of control activities for the entity's internal control system. Control activities help management fulfill responsibilities and address identified risk responses in the internal control system. The common control activity categories listed in figure 6 are meant only to illustrate the range and variety of control activities that may be useful to management. The list is not all inclusive and may not include particular control activities that an entity may need.

Section 10.11

When choosing between entity-level and transaction control activities, management evaluates the level of precision needed for the operational processes to meet the entity's objectives and address related risks. In determining the necessary level of precision for a control activity, management evaluates the following:

- Purpose of the control activity – A control activity that functions to prevent or detect generally is more precise than a control activity that merely identifies and explains differences.
- Level of aggregation – A control activity that is performed at a more granular level generally is more precise than one performed at a higher level. For example, an analysis of obligations by budget object class normally is more precise than an analysis of total obligations for the entity.
- Consistency of performance – A control activity that is performed routinely and consistently generally is more precise than one performed sporadically.
- Correlation to relevant operational processes – A control activity that is directly related to an operational process generally is more likely to prevent or detect than a control activity that is only indirectly related.

RRB's BFS and BFO neither maintained nor tracked the individual cost of the RRB's 53 field offices because cost information was tracked at the bureau level. According to BFS, the bureau had limited managerial resources and was focused on budget spending across the bureau. RRB's Deputy CFO confirmed that RRB tracked only the total cost of their 53 field offices. When RMA asked the RRB's BFS to provide the individual costs by field office, BFS manually calculated the cost breakdown using sources from various bureaus (e.g., individual contracts and invoices from

⁵⁸ GAO 14-704G, *Standards for Internal Control in the Federal Government* (Green Book), Principle 10, Design Control Activities.

the BFO). BFS stated that developing individual field office cost information required assistance from other RRB bureaus.

Additionally, RMA determined that the cost breakdown provided by BFS for its 53 field offices by object class code differed from the amount expended in BFS's budget allocation reports for fiscal years 2019, 2020, and 2021. Neither of these total cost values were consistent with the total operating costs as described in RRB's Cost Allocation Plan "Cost Allocation Methodology." Therefore, this data was unreliable.

RRB, the railroad community, and Congress did not have detailed cost information of the individual field offices. Without this information, RRB did not have insight into available resources and respective costs across the individual field offices to potentially reorganize its structure to better support the railroad community more efficiently and effectively, increase customer service, or facilitate new ways of doing business, including modernizing the RRB's customer service platforms. The amount of funding the RRB could potentially save or redirect to technological improvements and modernization was unknown.

RMA acknowledges the RRB BFO's proactive actions to correct these identified issues. According to RRB's BFO, GSA rent cost is tracked by individual field offices and through reports generated via the Public Buildings Service portal on OMB Max. BFO explained that RRB was able to provide the GSA rent cost for each field office. BFO further explained that the RRB has engaged its financial system contractor to implement the necessary programming and mapping changes needed to support tracking operating costs at both the individual field office and object class code levels, rather than just at the bureau level. BFO anticipates that the system and business process changes will be deployed starting October 1, 2023.

Recommendations

RMA recommends that the Bureau of Fiscal Operations:

16. Track costs both by field office and by object class code to ensure that the costs of each of the 53 field offices and staff are readily available and determine how often the cost data will be updated.
17. Establish a process to ensure the breakdown and total cost of the Bureau of Field Service is consistently monitored and reported.

Management's Comments and RMA's Response

BFO concurred with recommendations 16 and 17 and provided estimated completion dates of September 30, 2024 and March 31, 2025, respectively. For recommendation 16, BFO provided a target completion date that meets the intent of promptly implementing audit recommendations. However, for recommendation 17, BFO provided March 31, 2025 as its target date of completion. BFO should implement corrective action within one year after issuance of a final report.

Appendix A: Management's Comments



UNITED STATES OF AMERICA
RAILROAD RETIREMENT BOARD
844 NORTH RUSH STREET
CHICAGO, ILLINOIS 60611-1275

OFFICE OF ADMINISTRATION

January 19, 2024

Marc Hebert
RMA Associates
1005 N. Glebe Road, Suite 610
Arlington, VA 22201

SUBJECT: Management Response to the Draft Report on the Audit of the RRB's Organizational Structure and Field Service Operations

Thank you for the opportunity to comment on the referenced draft report that we received on January 5, 2024. The following is management's response to your finding and related recommendations:

Finding – Office of Administration did not comply with Agencywide Capital Planning Requirements.

In the referenced draft audit report RMA reported that RRB's Office of Administration (OA) did not create an agencywide capital planning reports as required by OMB memoranda during the fiscal years covered under scope of the audit (i.e., fiscal years 2019 through 2022).

RRB leadership generally agrees with the summary of the RRB's responsibilities to draft a Capital Plan per the OMB memoranda cited in the referenced audit report, to include that as a non-CFO Act agency, RRB is not required to submit such a plan to OMB. The plan is for internal use as the RRB is a small, independent, non-CFO Act agency. Additionally, OA and Bureau of Fiscal Operations (BFO) staff, both have located emails addressing various points of the discussion occurring during the August 10, 2022, meetings. Further, many members from RRB who were at these meetings and clearly remember the arrangement were also not able to locate any specific written exemption provided by OMB personnel. In recent emails and conversations with RRB staff, OMB staff recalled the August 10, 2022, conversation and recalled the verbal understanding that RRB arranged to substitute the relocation planning process in lieu of the memo-driven capital planning process, since there was not a requirement to submit such a capital plan to OMB.

The RRB objects to any implication that a verbal arrangement on RRB's capital planning, with respect to the headquarters building, was never discussed or considered between RRB leadership and the RRB's OMB examiner. The RRB will seek written follow-up for future meetings with OMB, GSA, and other entities with respect to the relocation and the effect on agency-wide capital planning.

In regard to the finding, RMA recommended that the Office of Administration:

Recommendation No. 1: "Create an agencywide capital planning report for fiscal years 2024 – 2028 that includes all field offices (in addition to headquarters) and addresses all considerations required by the Office of Management and Budget's latest Memorandum M-22-14."

Management Response No. 1: Partially concur; estimated completion date to be determined by OMB memoranda or as agreed to by RRB's OMB Examiner.

With respect to the RRB's current Capital Planning process, the RRB has been informed by GSA that RRB headquarters is being relocated within the City of Chicago to the Metcalfe Federal building. GSA provided a third-party contractor and RRB worked with that contractor to conduct a space analysis and space plan as an initial capital planning step for the relocation. The pending relocation greatly hinders the degree of headquarters capital planning that can be accomplished. To

the extent that the capital planning process should include and consider the future of the Field Offices, the RRB concurs that the RRB will begin to engage in a capital planning process, using the OMB memoranda for guidance.

To the extent that any such capital plan should include major changes to RRB's HQ between the years 2024 – 2028, the RRB does not concur as GSA has publicly listed the Lipinski Federal Building on the Federal Building Disposition List and has informed the RRB that the relocation will begin and be complete with an estimated timeframe from 2030 – 2032 for planning, build-out and relocation. The RRB also non-concurs that it is OA that must exclusively consider the field offices. The field offices are within the purview of the Bureau of Field Service (BFS). OA concurs that it will partner with BFS to consider field offices in an agency-wide capital plan.

Recommendation No. 2: *“Adequately document exemptions of the Office of Management Budget’s memorandums related to the agencywide capital planning requirement.”*

Management Response No. 2: Concur; estimated completion date: 9.30.2024

Respectfully,

JACK
SCHREIBMAN
Jack Schreibman
Director of Administration

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SCHREIBMAN
Date: 2024.01.19 10:32:10
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cc: Mark Blythe, Director of Field Services
Shawna Weekley, Chair of the Executive Committee and Chief Financial Officer
Shanon Holman, Assistant Inspector General for Audit
Mario Moreno, Jr., Deputy Chief Financial Officer
Chiquita Lowery, Director of Audit Affairs and Compliance
Charles Trucco, Deputy Director of Operations Support



UNITED STATES GOVERNMENT
MEMORANDUM

FORM G-115f (1-92)
RAILROAD RETIREMENT BOARD

January 19, 2024

TO : Marc Hebert, RMA Associates

FROM : Mark Blythe
Director, Bureau of Field Service

MARK BLYTHE
Digitally signed by MARK BLYTHE
Date: 2024.01.19 10:43:25 -06'00'

SUBJECT: Management Response to the Draft Report on the Audit of the RRB's Organizational Structure and Field Service Operations

Thank you for the opportunity to comment on the referenced draft report that we received on January 5, 2024. The following is management's response to your finding and recommendations:

Finding – Optimal Number of Field Service Employees to Support the Railroad Community's Call Demand is Unknown

Although this finding is dedicated to the optimal number of FTE to support call demand, the finding does not include the holistic demands of Field Service, including in-person service, public affairs events, email service, online service, post-entitlement workloads, and administrative functions related to these services.

Field Service and the RRB develop an annual Human Capital Plan. The Plan requires senior leadership in each RRB bureau and office to identify optimal FTE levels considering the totality of position responsibilities and workloads, and anticipated position attrition, to guide hiring and succession management. The Human Capital Planning process, and by extension Field Service's Human Capital Planning process, was recently audited by the Government Accountability Office (GAO) in audit GAO-24-105545, RRB: *Agency Could Strengthen Plans to Address Key Management Challenges* 12 (2023). GAO found, "RRB's human capital plans and efforts to date have incorporated all key practices for effective strategic workforce planning," and made no recommendations for improvements.

Staffing is dependent upon appropriations; Field Service follows the budget justification process, as appropriate, and realized staffing is based on appropriations received and hiring needs identified in the Human Capital Plan.

Regarding the finding, the RMA recommended that the Bureau of Field Service:

Recommendation No. 3: "Implement and document a review process to verify the completeness, accuracy, and validity of the telecommunications data and analysis used to support telecommunications reports and Budget Justifications."

Management Response No. 3: Non-concur. Field Service acknowledges the telecommunications data issue that was self-identified in FY21 and corrected with implementation in FY22, outside the scope of the audit. Field Service does not concur with the recommendation based on this agreed upon fact, and as stated by RMA, and consider it closed.

cc: Shanon Holman, Assistant Inspector General for Audit
Michael Petry, Associate Director of Field Service
Charles Trucco, Deputy Director of Operations Support
Shawna Weekley, Chief Financial Officer/Chair of Executive Committee
Chiquita Lowery, Director of Audit Affairs and Compliance



UNITED STATES OF AMERICA
844 NORTH RUSH STREET
CHICAGO, ILLINOIS 60611-1275

January 19, 2024

Marc Hebert
RMA Associates
1005 N. Glebe Road, Suite 610
Arlington, VA 22201

SUBJECT: Management Response to the Draft Report on the Audit of the RRB's Organizational Structure and Field Service Operations

Thank you for the opportunity to comment on the referenced draft report that we received on January 5, 2024. The following is management's response to your finding and related recommendations:

Finding - Lack of Inter-Unit Communication

Recommendation No. 4: "Create a communication improvement plan describing inter-unit communication flows between Railroad Retirement Board's Bureau of the Actuary and Research and other bureaus whose changes may impact the Bureau of the Actuary and Research's analysis."

Management Response No. 4: Non-Concur

In addition to normal intercomponent communications with the Bureau of Actuary and Research (BAR), when the Office of Programs submits formal system change requests to the Bureau of Information Services (BIS), BAR receives a copy to ensure they are informed of any potential changes to our systems and/or databases.

Recommendation No. 5: "Create a communication improvement plan describing inter-unit communication flows between Railroad Retirement Board's Office of Programs and the Bureau of Field Service."

Management Response No. 5: Non-Concur

We have a communications chart that is posted on our internal website, Boardwalk, which is reviewed and updated annually to inform Headquarters and Field Service (FS) of who to call for specific questions or issues. This communications chart has been posted on Boardwalk for over 10 years. Also, individual work units in Programs have group mailboxes to send case inquiries or address other issues.

Recommendation No. 6: "Create a set of policies and or procedures for how the Railroad Retirement Board's primary units should communicate with one another to ensure compliance with Section OV3.04 of the Green Book.

Management Response No. 6: Non-Concur

While the current Executive Committee Charter became effective October 1, 2022, the prior charter was signed April 26, 2000, which was within the scope of the audit period. It seems counterproductive to agree to an audit finding, which would require additional administrative actions to close post audit activity. We would be creating cumbersome nonproductive work when the policies and procedures were in place to resolve the alleged audit condition during the scope of the audit.

The EC charter in effect prior to October 2023, will be provided separately.

Respectfully,

Arturo Cardenas
Director
Office of Programs

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CARDENAS** Digitally signed by
ARTURO CARDENAS
Date: 2024.01.19
12:24:35 -06'00'

cc: Mark Blythe, Director of Field Services
Shanon Holman, Assistant Inspector General for Audit
Shawna Weekley, Chief Financial Officer, Chair of the Executive Committee
Mario Moreno, Jr., Deputy Chief Financial Officer
Chiquita Lowery, Director of Audit Affairs and Compliance



UNITED STATES GOVERNMENT
MEMORANDUM

FORM G-115f (1-92)
RAILROAD RETIREMENT BOARD

January 19, 2024

TO : Marc Hebert, RMA Associates
FROM : Mark Blythe
Director, Bureau of Field Service **MARK BLYTHE**

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BLYTHE
Date: 2024.01.19 10:40:47
-06'00'

SUBJECT: Management Response to the Draft Report on the Audit for RRB’s Organizational Structure and Field Service Operations

Thank you for the opportunity to comment on the referenced draft report that we received on January 5, 2024. The following is management’s response to your finding and recommendations:

Finding – Lack of Documentation of Lessons Learned from the COVID-19 Pandemic

As outlined in the response to finding, **“OA Did Not Comply with Agencywide Capital Planning Requirements”** of this very audit, the *“RRB concurs that the RRB will begin to engage in a capital planning process, using the OMB memos for guidance... OA concurs that it will partner with BFS to consider field offices in an agency-wide plan.”* Since that finding is also based on OMB Memorandum M-22-14, and all actions from this finding are needed to support OMB Memorandum M-22-14, this finding is duplicative. However, Field Service acknowledges the need to incorporate field offices with agencywide capital planning requirements and will work with the Office of Administration to complete the necessary actions and in the spirit of OMB Memorandum M-22-14.

Prior to the COVID-19 pandemic, Field Service had not participated in the agency telework program. Using lessons learned from the pandemic upon reentry into the office post-pandemic, dated outside the scope of the audit, Field Service implemented a hybrid telework program for the first time. In May 2023, Field Service drafted a plan to study the potential for field office telework expansion that will take into account the impact of the current telework program, potential costs and savings of telework expansion, employee satisfaction, and the readiness of IT systems to support expanded telework, among other things. This study will begin shortly after this audit’s final report.

RRB’s plans, including Field Service’s aforementioned plans, for returning to a post-pandemic work environment was recently audited by the Government Accountability Office (GAO) in audit GAO-24-105545, RRB: *Agency Could Strengthen Plans to Address Key Management Challenges* 12 (2023). GAO found that the RRB, including Field Service, “mostly or fully implemented” all key practices and made no recommendations for improvements.

Regarding the finding, the RMA recommended that the Bureau of Field Service:

Recommendation No. 7: “Document its lessons learned from the COVID-19 pandemic.”

Management Response No. 7: Concur; estimated completion date: BFS will partner with OA to comply with due dates in OMB Memoranda.

Recommendation No. 8: “Distribute its documented lessons learned to all applicable Railroad Retirement Board units to help improve the efficiency and effectiveness of Railroad Retirement Board operations.”

Management Response No. 8: Non-concur. The Criteria section of the finding which the recommendations are based, solely references OMB Memorandum M-22-14, which “requires agencies to restart their annual planning process by developing and submitting their FY 2024 – FY 2028 capital plans to OMB and the Federal Real Property Council”. While the language directs agencies to “reimagine their workplace approach informed by lessons from the COVID-19 pandemic... and integrate these considerations into the next iteration of their capital plans...”, there is no requirement in the memo to distribute any lessons learned. Additionally, lessons learned from Field Service (e.g. telework, relaxed signature policy) are inclusive to Field Service operations only; there is no applicability to other agency bureaus in this regard.

Recommendation No. 9: “Determine the number of field offices that continued to accept faxed or emailed sickness benefit applications as of June 2023, and assess the impact of such actions.”

Management Response No. 9: Non-concur. Field Service also acknowledges the “relaxed” policy regarding the acceptance of sickness benefit applications and claims via fax and email that was instituted during the COVID-19 pandemic to ease customer burdens. Field Service collaborated with agency partners for the policy to become permanent, with official policy guidance issued to all employees on March 30, 2023. Field Service does not concur with the recommendation based on this agreed upon fact, and as stated by RMA, and consider it closed.

Recommendation No. 10: “Determine if an official policy change should be made regarding the submission of sickness and unemployment benefit applications and claims, based on COVID-19 pandemic lessons learned and an assessment of the impact of the relaxed COVID-19 pandemic policy.”

Management Response No. 10: Non-concur. Field Service also acknowledges the “relaxed” policy regarding the acceptance of sickness benefit applications and claims via fax and email that was instituted during the COVID-19 pandemic to ease customer burdens. Field Service collaborated with agency partners for the policy to become permanent, with official policy guidance issued to all employees on March 30, 2023. Field Service does not concur with the recommendation based on this agreed upon fact, and as stated by RMA, and consider it closed.

cc: Shanon Holman, Assistant Inspector General for Audit
Jack Schreiber, Director of Administration
Daniel Bartnicki, Deputy Director of Administration
Michael Petry, Associate Director of Field Service
Charles Trucco, Deputy Director of Operations Support
Shawna Weekley, Chief Financial Officer/Chair of Executive Committee
Chiquita Lowery, Director of Audit Affairs and Compliance



UNITED STATES GOVERNMENT
MEMORANDUM

FORM G-115f (1-92)
RAILROAD RETIREMENT BOARD

January 19, 2024

TO : Marc Hebert, RMA Associates

FROM : Mark Blythe
Director, Bureau of Field Service

MARK BLYTHE

Digitally signed by MARK
BLYTHE
Date: 2024.01.19 10:45:02 -06'00'

SUBJECT: Management Response to the Draft Report on the Audit for RRB's Organizational Structure and Field Service Operations

Thank you for the opportunity to comment on the referenced draft report that we received on January 5, 2024. The following is management's response to your finding and recommendations:

Finding – Lack of Policies and Procedures for Customers with LEP

Field Service acknowledges the need to support customers with LEP and will procure a contract that will secure on demand translating services for public facing employees within the organization that supports the agency-wide 2023 Language Access Plan that was approved by the Board in May 2023.

Field Service will also partner with the RRB Office of Equal Opportunity to support this process and provide training to all field office employees. Field Service will also collaborate with the RRB Office of Public Affairs to promote the service online and other public access avenues to increase awareness within the railroad community.

Regarding the finding, the RMA recommended that the Bureau of Field Service:

Recommendation No. 11: "Create policies and procedures for Railroad Retirement Board employees to assist customers with limited English proficiency."

Management Response No. 11: Concur; estimated completion date: 9/30/24

Recommendation No. 12: "Determine the amount of resources needed to assist customers with limited English proficiency."

Management Response No. 12: Non-concur. Rather than pay for a lump sum of translations at a time based on estimations, Field Service will ensure the contract is a pay-as-you-go system for every translation done, similar to contracts with other agencies with public facing employees.

Recommendation No. 13: *“Provide resources to employees to ensure access to language assistance resources.”*

Management Response No. 13: Concur; estimated completion date: 9/30/24

Recommendation No. 14: *“Provide training for employees on how to assist customers with limited English proficiency.”*

Management Response No. 14: Concur; estimated completion date: 9/30/24

cc: Shanon Holman, Assistant Inspector General for Audit
Jack Schreibman, Director of Administration
Daniel Bartnicki, Deputy Director of Administration
Michael Petry, Associate Director of Field Service
Charles Trucco, Deputy Director of Operations Support
Shawna Weekley, Chief Financial Officer/Chair of Executive Committee
Chiquita Lowery, Director of Audit Affairs and Compliance



UNITED STATES GOVERNMENT
MEMORANDUM

FORM G-115f (1-92)
RAILROAD RETIREMENT BOARD

January 22, 2024

TO : Marc Hebert
RMA Associates
1005 N. Glebe Rd. Suite 610
Arlington, VA 22201

FROM : Terryne F. Murphy TERRYNE
Chief Information Officer MURPHY

Digitally signed by TERRYNE
MURPHY
Date: 2024.01.22 15:12:22
-05'00'

SUBJECT: Proposed Management Response – NFR-06, Audit for RRB’s Organizational Structure
And Field Service Operations

Finding – Technological Improvements and Modernization is Needed

As outlined in recent audit findings, namely, “*Railroad Retirement Board, Agency Could Strengthen Plans to Address Key Management Challenges*”, GAO-24-105545, dated December 2023, the RRB concurred with the GAO recommendation to ensure written plans clearly state the intended results of the [ongoing] IT Modernization. Since RRB’s concurrence with the findings of this report, the RRB considers this finding duplicative. Additionally, the RRB has been planning and implementing its enterprise-wide modernization in earnest since 2018. The RRB’s IT Modernization Program has three phases, Stabilize | Modernize | Perform. In fiscal year (FY) 2024, as Information Services completes the Enterprise Infrastructure Solutions project, in conjunction with GSA, the RRB will complete its Stabilize phase and with its first TMF-approved investment, initiate its Modernize Phase, where the focus will be to modernize 200+ COBOL applications, among other IT systems.

Regarding the finding, the RMA recommended that the Bureau of Field Service:

Recommendation No. 15: “*Work with the Bureau of Information Services to develop and implement a detailed project plan to document and formally communicate project implementation steps to modernize RRB’s technology to better serve its customers and carry out the agency’s primary mission. At a minimum, the Bureau of Field Service should ensure the plan contains:*

- *Insights from the Veterans Affairs’ design and implementation strategies of their online Veteran Benefits Administration benefits;*
- *A course of action to develop and increase availability of an advanced, comprehensive system to include online Railroad Unemployment Insurance Act and Railroad Retirement Act applications;*
- *Insights from the Veterans Affairs’ transition to a paperless environment; and*
- *A course of action to ensure the use of secure login credentialing services for the railroad community such as Login.gov and ID.me.”*

Note: Field Service non-concurs with jurisdiction of this finding, as all items are within the purview of the Bureau of Information Services. The POC for the remainder of this response is Terryne F. Murphy, Chief Information Officer, RRB, at 312.384.0157 or terryne.murphy@rrb.gov.

Management Response No. 15: Concur. Pursuant to sufficient staffing and funding, the Bureau of Information Services will work with Bureau of Field Service, and other bureaus and offices within the RRB, to continue to develop and implement project plans to modernize RRB's technology in accordance with federal guidance and agency priorities.

The remainder of the response addresses each subsection of Recommendation No. 15's description of the plans for modernization.

Recommendation No. 15 (Regarding Project Plans) (A): *At a minimum, the Bureau of Field Service should ensure the plan contains:*

A) Insights from the Veterans Affairs' design and implementation strategies of their online Veteran Benefits Administration benefits.

Management Response No. 15 (A): Non-concur. The Department of Veterans Affairs staffing levels and budget are both orders of magnitude greater than the RRB's resources. Information Services does acknowledge the potential value of better understanding the Department's modernization journey. To this end, Information Services has already initiated communication with entities within the Department to glean lessons learned. Given the vast differences, however, in available resources, staffing and funding specifically, Information Services does not concur with this recommendation and considers it closed.

Recommendation No. 15 (B): *A course of action to develop and increase availability of an advanced, comprehensive system to include online Railroad Unemployment Insurance Act and Railroad Retirement Act applications.*

Management Response No. 15 (B): Concur. Information Services already collaborates with Field Service and Programs to understand needs and priorities of the benefit streams derived from these two enacted laws, Railroad Unemployment Insurance Act and Railroad Retirement Act. As sufficient resources, specifically staffing and funding become available, Information Services will include the development and implementation of modernized applications for these benefits streams.

Recommendation No. 15 (C): *Insights from the Veterans Affairs' transition to a paperless environment.*

Management Response No. 15 (C): Non-concur. The Department of Veterans Affairs staffing levels and budget are both orders of magnitude greater than the RRB's resources. Information Services does acknowledge the potential value of better understanding the Department's modernization journey as it relates to the transition to a paperless environment. To this end, Information Services has already initiated communication with entities within the Department to glean lessons learned. Given the vast differences, however, in available resources, staffing and funding specifically, Information Services does not concur with this recommendation and considers it closed.

Recommendation No. 15 (D): *A course of action to ensure the use of secure login credentialing services for the railroad community such as Login.gov and ID.me.”*

Management Response No. 15 (D): Concur. Information Services acknowledges, as does the RRB demonstrated by its current use of Login.gov since 2019, the need for secure login credentialing services. As sufficient staffing and funding resources become available, and in accordance with all federal guidelines and agency priorities, Information Services will include all required functionality for secure login credentialing for the railroad community as part of its modernization efforts.

cc: Shanon Holman, Assistant Inspector General for Audit
 Jack Schreibman, Director of Administration
 Daniel Bartnicki, Deputy Director of Administration
 Michael Petry, Associate Director of Field Service
 Charles Trucco, Deputy Director of Operations Support
 Shawna Weekley, Chief Financial Officer/Chair of Executive Committee
 Chiquita Lowery, Director of Audit Affairs and Compliance



UNITED STATES OF AMERICA
RAILROAD RETIREMENT BOARD
844 NORTH RUSH STREET
CHICAGO, ILLINOIS 60611-1275

OFFICE OF THE CHIEF FINANCIAL OFFICER

January 17, 2024

Marc Hebert
RMA Associates
1005 N. Glebe Road, Suite 610
Arlington, VA 22201

SUBJECT : Management Response to the Draft Report on the Audit of the RRB's Organizational Structure and Field Service Operations

Thank you for the opportunity to comment on the referenced draft report that we received on January 5, 2024. The following is management's response to your finding and related recommendations:

Finding – Lack of Supported Cost Breakdowns for RRB's 53 Field Offices.

We acknowledge that RRB tracks field office cost information aggregately by budget object class code in our financial management system and not at the individual field office level. To address this issue, we engaged with our financial system contractor to implement the necessary programming and mapping changes in order to break down costs normally reported in aggregate to the individual field office level. The system changes were effective October 1, 2023. We will continue to coordinate with RRB Bureaus on procedure changes to support tracking and reporting field office cost data at a more granular level. At this writing, we have already begun to track payroll costs at both the individual field office and the object class code levels within our financial management system.

In regard to the finding, the RMA recommended that the Bureau of Fiscal Operations:

Recommendation No. 16: "Track costs both by field office and by object class code to ensure that the costs of each of the 53 field offices and staff are readily available and determine how often the cost data will be updated."

Management Response No. 16: Concur; estimated completion date: 9.30.2024

Recommendation No. 17: "Establish a process to ensure the breakdown and total cost of Bureau of Field Service is consistently monitored and reported."

Management Response No. 17: Concur; estimated completion date: 3.31.2025

Respectfully,

SHAWNA WEEKLEY
Digitally signed by SHAWNA WEEKLEY
Date: 2024.01.17 16:24:13 -06'00'

Shawna R. Weekley
Chair of the Executive Committee
Chief Financial Officer

cc: Mark Blythe, Director of Field Services
Shanon Holman, Assistant Inspector General for Audit
Mario Moreno, Jr., Deputy Chief Financial Officer
Chiquita Lowery, Director of Audit Affairs and Compliance
Charles Trucco, Deputy Director of Operations Support

Appendix B: Operating Costs for Field Offices

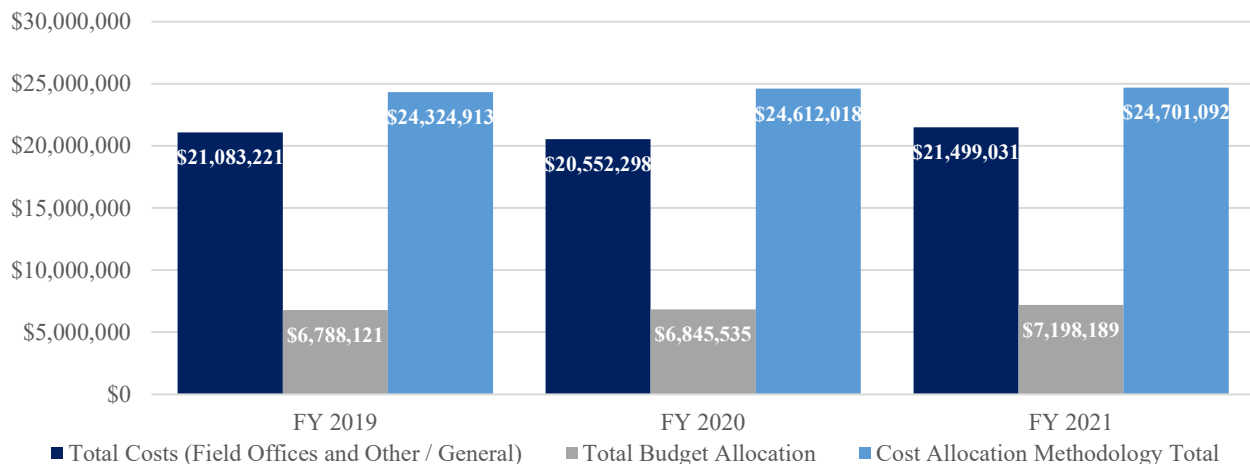
Objective 3: Determine the operating costs and rent for the 53 field offices and staff for each fiscal year.

Procedures and Supporting Information

RMA determined that the RRB’s available resources were not sufficient to accurately determine the total operational and rental cost for each of the 53 RRB field offices. Details comparing available resources and the range of estimates are depicted in **Figure 2** and **Table 1**.

In **Figure 2**, RMA summarized the costs associated with the 53 field offices, by the total cost, the annual budget allocation, and cost allocation. As shown, the costs vary significantly.

Figure 2: 53 Field Offices Total Costs by Fiscal Year



In **Table 1**, RMA summarized the field office operating costs and totals provided by BFS for fiscal years 2019, 2020, and 2021. As discussed in **Lack of Supported Cost Breakdowns for RRB’s 53 Field Offices** RRB management could not provide the official operating costs for its field offices. BFS was able to coordinate with various bureaus to provide a cost breakdown based on various internal sources. Regardless, they could not provide equipment costs, current and former personnel benefit costs, and contractual services costs by field office. “Subtotal – Other or General” refers to costs that were provided to RMA under an object class code but not labeled for a specific field office. Therefore, **Table 1** should be understood as an estimated cost rather than the official cost. The end of the table also summarizes field office operating costs from other sources provided by RRB management.

Table 1: Estimated Field Office Operating Costs Sorted from Highest to Lowest for Fiscal Year 2021

Field Office	FY 2019	FY 2020	FY 2021
Chicago, IL	\$3,107,352.30	\$2,849,076.81	\$2,896,533.88
Charlotte, NC	\$566,296.98	\$589,209.16	\$724,682.00

Field Office	FY 2019	FY 2020	FY 2021
Denver, CO	\$527,909.82	\$558,407.20	\$666,586.26
Covina, CA	\$702,356.37	\$744,972.48	\$663,632.02
Jacksonville, FL	\$589,930.32	\$607,297.82	\$617,127.19
Houston, TX	\$534,620.92	\$574,319.65	\$585,883.86
St. Louis, MO	\$607,060.62	\$573,537.80	\$583,350.01
Fort Worth, TX	\$441,249.82	\$492,320.54	\$572,941.43
Detroit, MI	\$419,473.01	\$443,797.64	\$516,399.78
Cleveland, OH	\$463,503.18	\$481,697.50	\$504,359.44
Omaha, NE	\$532,395.36	\$505,623.08	\$489,830.95
Atlanta, GA	\$453,144.66	\$384,843.83	\$449,014.83
Salt Lake City, UT	\$379,899.24	\$394,688.72	\$444,051.19
Newark, NJ	\$391,984.64	\$417,369.06	\$420,381.21
Tampa, FL	\$388,192.62	\$404,472.72	\$410,140.85
Kansas City, MO	\$458,086.18	\$472,019.55	\$398,622.52
Mesa, AZ	\$352,891.24	\$345,920.22	\$390,674.68
Roanoke, VA	\$335,955.22	\$318,036.44	\$390,475.01
Roseville, CA	\$245,719.11	\$261,116.67	\$374,559.61
Portland, OR	\$345,575.74	\$281,907.35	\$370,851.76
Buffalo, NY	\$479,353.27	\$396,552.48	\$365,987.99
Boston, MA	\$270,812.07	\$348,289.91	\$357,989.64
Nashville, TN	\$188,453.86	\$229,640.14	\$350,622.81
Oakland, CA	\$296,046.43	\$211,074.57	\$345,221.44
Decatur, IL	\$270,962.53	\$283,870.54	\$343,095.82
Central Islip, NY	\$408,649.80	\$279,435.65	\$334,271.36
Joliet, IL	\$252,264.40	\$316,727.53	\$333,300.32
Cincinnati, OH	\$257,274.29	\$269,888.09	\$332,320.29
Huntington, WV	\$576,849.28	\$405,686.13	\$324,720.69
Indianapolis, IN	\$310,768.51	\$319,032.68	\$313,840.30
Pittsburgh, PA	\$256,573.74	\$298,131.82	\$309,510.27
New York, NY	\$183,656.68	\$261,802.38	\$306,265.62
Duluth, MN	\$236,889.63	\$242,795.26	\$304,774.27
Richmond, VA	\$220,478.21	\$161,755.75	\$297,344.31
Birmingham, AL	\$252,573.04	\$275,280.97	\$289,436.01
Little Rock, AR	\$251,712.87	\$196,950.85	\$288,305.06
St. Paul, MN	\$403,458.16	\$430,286.01	\$286,408.11
Scranton, PA	\$269,442.00	\$277,129.46	\$284,185.60
Baltimore, MD	\$322,371.17	\$207,590.50	\$283,091.16
Wichita, KS	\$255,093.77	\$202,205.70	\$259,179.82
Billings, MT	\$208,090.63	\$246,523.34	\$257,217.36
Harrisburg, PA	\$237,805.03	\$219,740.17	\$253,890.03

Field Office	FY 2019	FY 2020	FY 2021
New Orleans, LA	\$364,194.76	\$380,555.03	\$252,843.02
Seattle, WA	\$240,670.79	\$207,917.50	\$249,987.69
Albuquerque, NM	\$252,367.51	\$232,558.86	\$235,589.16
Philadelphia, PA	\$269,886.90	\$232,778.93	\$230,499.11
Altoona, PA	\$328,244.50	\$212,143.31	\$216,830.27
Fargo, ND	\$315,523.35	\$270,283.48	\$200,043.96
Des Moines, IA	\$160,988.57	\$169,606.64	\$177,444.62
Milwaukee, WI	\$210,002.77	\$298,652.74	\$167,860.19
Louisville, KY	\$253,910.99	\$227,613.06	\$158,248.70
Spokane, WA	\$210,559.84	\$224,609.45	\$157,958.33
Albany, NY	\$105,337.62	\$160,323.14	\$152,662.15
Subtotal – 53 Field Offices	\$20,964,864.32	\$20,398,066.31	\$21,491,043.96
Subtotal – Other or General	\$118,356.48	\$154,231.90	\$7,987.21
Total (53 Field Offices and Other or General)	\$21,083,220.80	\$20,552,298.21	\$21,499,031.17

RMA found that on average, the Budget Allocation totals were 67% less than the total costs. The Cost Allocation Methodology totals were on average 17% more than the total costs. In addition, RMA found that RRB’s available sources of the total operating cost for the 53 field offices in BFS resulted in different estimates. As shown in the different total values for the cost of RRB’s 53 field offices in **Table 1**, the breakdown BFS provided via their object class code tracking was not consistent with the amount expended in BFS’s budget allocation reports for fiscal years 2019, 2020, and 2021. Moreover, the total values were not consistent with the total operating costs as described in RRB’s Cost Allocation Plan “Cost Allocation Methodology.” As this issue pertained to disparate calculations across different sources rather than an inaccurate calculation, RMA does not consider these funds to be “Questioned Costs.”⁵⁹

⁵⁹ The IG Act of 1978, revised December 27, 2022, Section 405(a)(4)(B) defines “questioned costs” – *the term “questioned cost” means a cost that is questioned by the Office because of (A) an alleged violation of a provision of a law, regulation, contract, grant, cooperative agreement, or other agreement or document governing the expenditure of funds; (B) a finding that, at the time of the audit, the cost is not supported by adequate documentation (C) a finding that the expenditure of funds for the intended purpose is unnecessary or unreasonable.*

Appendix C: Effectiveness of the Field Offices

Objective 4: Assess the effectiveness and efficiency of the 53 field service offices and how it had changed over the years provided in the scope.

RMA defined effectiveness as the percentage of goals established by BFS achieved on an annual basis. In addition, RMA concluded that efficiency at BFS increased slightly from fiscal year 2019 to fiscal year 2020 but returned to fiscal year 2019 levels between fiscal years 2020 and 2021. RMA defined efficiency as the work output⁶⁰ by each field service employee in a given fiscal year.

RRB’s BFS was as efficient and as effective in fiscal year 2019 as fiscal year 2021. This highlighted that the hybrid telework policy did not hinder the efficiency or effectiveness of the field service offices.

Procedures and Supporting Information

In **Table 2**, RMA summarized BFS’s goals and results for fiscal years 2019, 2020, and 2021.

Table 2: BFS Goals and Results for Fiscal Years 2019, 2020, and 2021⁶¹

Goals	FY 2019	FY 2020	FY 2021
Goal 1: RRA applications will be submitted to headquarters in 4 days or less from receipt in field office in accordance with our Customer Service standards. RRA applications will undergo validation reviews that are conducted by quality assurance staff within PEMS component to ensure accuracy. (Level 3 = 4 days)	Goal: 4 days Achieved: 2.59 days	Goal: 4 days Achieved: 3.24 days	Goal: 4 days Achieved: 3.9 days
Goal 2: Forward all disability cases with medical evidence of record to the Disability Benefits Division (DBD) in an average of 21 days or less to achieve our Customer Service Standards and meet Performance Goal II-B. (Level 3 – 21 Days)	Goal: 21 days Achieved: 20.88 days	Goal: 21 days Achieved: 25.2 days	N/A ⁶²
Goal 3: Process UI claims and SI claims per the Railroad Unemployment Insurance Act (I-A-6) and in accordance with validation reviews conducted by staff within PEMS. 95% of claims are processed with the given timeframe per Customer Service standards and Performance Goal II-B. (Level 3 = 95%) ⁶³	UI Goal: 98% Achieved: 99.9% SI Goal: 98% Achieved: 99.9%	UI Goal: 98.5% Achieved: 99.9% SI Goal: 98.5% Achieved: 99.5%	Goal: 95% Achieved: 99.9%

⁶⁰ Work output refers to the recorded tasks completed by field service employees (e.g., addressing calls and walk-ins, entering sickness and unemployment claims, interviewing claimants as necessary, updating claimant information).

⁶¹ Source Information: Director of Field Service SES Performance Plan for fiscal years 2019, 2020, and 2021.

⁶² BFS did not include Goal 2 for fiscal year 2021.

⁶³ Not separated by UI and SI claims.

Goals	FY 2019	FY 2020	FY 2021
Goal 4: Achieve a UI and SI claims dollar payment accuracy rate of at least 95% (II-B-2) per the Railroad Retirement Unemployment Insurance Act and in accordance with validation reviews conducted by quality assurance staff within PEMS. (Level 3=95%)	UI Goal: 95% Achieved: 95.71% SI Goal: 97.50% Achieved: 98.33%	UI Goal: 96.50% Achieved: 99.92% SI Goal: 97.50% Achieved: 98.80%	UI Goal: 95% Achieved: 96.9% (FY3TQ) SI Goal: 95% Achieved: 98.2% (FY3TQ)
Goal 5: Achieve a railroad retirement benefit payment recurring accuracy rate of at least 99% according to agency policy. Payment accuracy is measured by regular diagnostic reviews conducted by quality assurance staff within PEMS component. (Level 3 = 97%) ⁶⁴	Goal: 99% Achieved: 99.99% for Initial RRA payments	Goal: 99.50% Achieved: 99.94% for Initial RRA payments	Goal: 97% Achieved: 99.9% (FYT2Q)

⁶⁴ Accuracy rate was changed to 97% for 2021.

Appendix D: Productivity of the Field Offices

Objective 5: Determine whether the overall productivity of field service offices justify 53 field offices across the country.

RMA determined that productivity based on calls, walk-ins, and quiet time were deflated and should be interpreted as the minimum time that the employees at each field office worked. Other time spent at work was not quantified nor included in the determination of whether the overall productivity of field service offices justified 53 field offices across the country.

Procedures and Supporting Information

Table 3 shows the total quantifiable hours worked at each field office for fiscal years 2019, 2020, and 2021. Specifically, the total quantifiable hours for each fiscal year were calculated by summing the hours field office employees spent on calls, walk-ins, and quiet time. **Table 4** shows the average hours field office employees worked per day. This was calculated by dividing the total hours by the number of FTEs in the field office divided by the number of working days in a year. The working days were calculated by subtracting federal holidays, annual leave, and sick leave from the total work hours as established by OPM. The working days were 218 in 2019 and 2020 and 216 in 2021.

Table 3: Total Hours Worked at the Field Office Sorted from Lowest to Highest for Fiscal Year 2021⁶⁵

Field Office	FY 2019 Total Hours	FY 2020 Total Hours	FY 2021 Total Hours
St. Paul, MN	2,890.10	2,579.20	970.20
Des Moines, IA	1,788.50	1,676.00	1,264.90
Albany, NY	753.10	1,111.50	1,352.10
Altoona, PA	3,773.70	2,388.80	1,508.30
Fargo, ND	1,974.80	2,175.50	1,520.20
Wichita, KS	2,107.40	1,528.70	1,629.10
Louisville, KY	1,748.70	2,770.00	1,758.00
Billings, MT	1,728.20	1,749.20	1,802.60
Seattle, WA	1,425.70	1,285.60	1,828.10
Milwaukee, WI	1,676.90	2,784.80	1,909.40
Albuquerque, NM	2,612.80	2,144.60	2,072.60
Spokane, WA	1,997.70	2,317.10	2,091.60
New York, NY	1,361.30	1,496.50	2,100.90
Oakland, CA	2,181.20	1,516.50	2,142.60
Baltimore, MD	3,933.40	2,841.40	2,149.80
Richmond, VA	1,603.30	1,640.50	2,265.10
Little Rock, AR	2,544.30	1,549.00	2,343.50
Decatur, IL	3,299.20	2,514.10	2,475.10
New Orleans, LA	1,671.20	3,702.50	2,543.60

⁶⁵ Source information included workload and FSO Agent Queue Annual reports by field office.

Field Office	FY 2019 Total Hours	FY 2020 Total Hours	FY 2021 Total Hours
Roseville, CA	2,941.50	2,790.40	2,741.70
Duluth, MN	3,002.30	2,891.40	2,882.70
Boston, MA	2,819.90	2,998.20	2,911.10
Cincinnati, OH	2,602.10	2,685.00	2,991.30
Huntington, WV	6,301.30	4,843.80	3,002.80
Philadelphia, PA	3,307.00	2,848.10	3,073.80
Portland, OR	3,675.30	2,262.40	3,164.80
Central Islip, NY	3,963.20	3,077.70	3,165.00
Joliet, IL	3,734.20	3,510.50	3,182.50
Harrisburg, PA	3,657.40	2,739.10	3,187.50
Newark, NJ	3,830.50	3,955.50	3,199.30
Buffalo, NY	5,428.80	4,146.90	3,200.20
Mesa, AZ	4,156.70	3,499.20	3,242.70
Nashville, TN	2,979.80	2,164.20	3,246.10
Scranton, PA	3,275.60	3,101.10	3,280.50
Pittsburgh, PA	2,699.40	2,879.90	3,539.10
Tampa, FL	4,406.10	4,544.60	3,548.70
Salt Lake City, UT	3,664.30	3,449.00	3,583.10
Birmingham, AL	3,290.00	2,799.90	3,711.80
Kansas City, MO	4,828.50	4,521.80	3,865.70
Roanoke, VA	4,263.40	3,916.60	3,892.50
St. Louis, MO	6,518.20	4,744.30	4,002.30
Indianapolis, IN	3,297.30	4,246.60	4,060.80
Covina, CA	6,125.10	5,783.30	4,395.10
Omaha, NE	6,013.00	5,136.80	4,509.60
Cleveland, OH	5,147.90	4,955.00	4,567.70
Houston, TX	5,693.80	5,490.90	4,742.90
Denver, CO	4,805.50	4,513.20	4,757.10
Atlanta, GA	5,302.70	5,631.90	4,941.80
Fort Worth, TX	5,295.90	4,816.80	5,080.20
Charlotte, NC	4,527.70	4,880.00	5,248.90
Detroit, MI	3,439.50	5,056.80	5,252.80
Jacksonville, FL	5,865.70	5,611.00	5,651.70
Chicago, IL	8,358.50	8,655.90	7,384.10

Table 4: Average Hours Field Office Employees Worked per Day Sorted from Lowest to Highest for Fiscal Year 2021

Field Office	FY 2019 Average Hours Field Office Employees Worked per Day	FY 2020 Average Hours Field Office Employees Worked per Day	FY 2021 Average Hours Field Office Employees Worked per Day
Fargo, ND	4.5	3.3	2.3
Oakland, CA	3.3	3.5	2.5

Field Office	FY 2019 Average Hours Field Office Employees Worked per Day	FY 2020 Average Hours Field Office Employees Worked per Day	FY 2021 Average Hours Field Office Employees Worked per Day
Wichita, KS	3.2	3.5	2.5
Little Rock, AR	3.9	3.6	2.7
Billings, MT	4	2.7	2.8
Denver, CO	3.7	3.5	2.8
Seattle, WA	3.3	3	2.8
Decatur, IL	5	3.8	2.9
Des Moines, IA	4.1	3.8	2.9
Portland, OR	4.2	5.2	2.9
Charlotte, NC	3.5	3.7	3
Mesa, AZ	4.8	4	3
Nashville, TN	6.8	3.3	3
Albany, NY	3.5	2.6	3.1
Albuquerque, NM	4	3.3	3.2
New York, NY	6.2	3.4	3.2
Roseville, CA	4.5	4.3	3.2
Spokane, WA	3.1	3.5	3.2
Baltimore, MD	4.5	6.5	3.3
Duluth, MN	4.6	4.4	3.3
Jacksonville, FL	3.8	3.7	3.3
Pittsburgh, PA	4.1	3.3	3.3
Salt Lake City, UT	4.2	4	3.3
Boston, MA	4.3	3.4	3.4
Covina, CA	4	3.8	3.4
Fort Worth, TX	4.9	3.7	3.4
Altoona, PA	4.3	5.5	3.5
Cincinnati, OH	4	4.1	3.5
Cleveland, OH	3.9	3.8	3.5
Huntington, WV	4.1	4.4	3.5
Omaha, NE	4.6	3.9	3.5
Richmond, VA	3.7	3.8	3.5
Kansas City, MO	4.4	4.2	3.6
Philadelphia, PA	5.1	4.4	3.6
Roanoke, VA	3.9	4.5	3.6
Buffalo, NY	5	4.8	3.7
Central Islip, NY	4.5	4.7	3.7
Houston, TX	4.4	4.2	3.7
Joliet, IL	4.3	4	3.7
Newark, NJ	4.4	4.5	3.7
St. Louis, MO	4.3	3.6	3.7

Field Office	FY 2019 Average Hours Field Office Employees Worked per Day	FY 2020 Average Hours Field Office Employees Worked per Day	FY 2021 Average Hours Field Office Employees Worked per Day
Atlanta, GA	4.1	5.2	3.8
New Orleans, LA	3.8	3.4	3.9
Detroit, MI	3.2	4.6	4.1
Louisville, KY	4	4.2	4.1
Tampa, FL	4	4.2	4.1
Birmingham, AL	5	3.2	4.3
Chicago, IL	4.3	4.4	4.3
Milwaukee, WI	3.8	4.3	4.4
St. Paul, MN	4.4	3.9	4.5
Indianapolis, IN	3.8	4.9	4.7
Harrisburg, PA	5.6	4.2	4.9
Scranton, PA	5	4.7	5.1

Appendix E: Location of Customers

Objective 6: Determine whether the population and location of where railroad employees (both currently employed in railroad service and retired railroad employees) reside justify 53 field offices across the country.

As of April 2023, RMA determined that the population and location of where railroad employees reside did justify 53 field offices across the country because of the 1) relationship between the number of customers within a commuting distance of a field office and the number of walk-ins and 2) impact to the customer of closing an office based on feedback from similar agencies. While our analysis demonstrated that field offices with more customers in a 50-mile radius received more walk-in appointments, it should not be considered the sole justification for field offices. Our analysis did not account for the entirety of the work performed in field offices but rather provided insight into the utilization of walk-in appointments at field offices.

However, with the limited number of walk-ins in comparison to the total work output, RRB should reevaluate the 53 field offices when leases expire by focusing on those field offices with the least number of customers within commuting distance of the field office.

Procedures and Supporting Information

In **Table 5**, RMA determined the number of RRB customers within 50 miles of an RRB field office for fiscal years 2019, 2020, and 2021. A commuting distance of 50 miles was set as the standard for the threshold distance a railroad customer would commute to a field office as defined by the IRS in the Internal Revenue Manuals Part 1, Chapter 32, Section 1: *IRS Local Travel Guide*.

The total railroad customers within 50 miles of their field office were calculated using railroad employee and beneficiary data provided by RRB management on September 16, 2022, as well as field office location data provided by RRB management on August 5, 2022.

Table 5: Number of RRB Customers within 50 Miles of an RRB Field Office for Fiscal Years 2019, 2020, and 2021⁶⁶

Field Office	FY 2019 Total RR Customers within 50 Miles of Field Office	FY 2020 Total RR Customers within 50 Miles of Field Office	FY 2021 Total RR Customers within 50 Miles of Field Office
Fargo, ND	1,663	1,665	1,625
Billings, MT	1,867	1,889	1,875
Duluth, MN	2,036	2,068	2,048
Des Moines, IA	2,354	2,382	2,267
Albuquerque, NM	2,442	2,434	2,355
Milwaukee, WI	2,503	2,484	2,406
Wichita, KS	2,791	2,819	2,764

⁶⁶ Source information included 1) employee data by district office, state, county, and age for fiscal years 2019, 2020, and 2021; 2) railroad and social security monthly benefit payment data for fiscal years 2019, 2020, and 2021; and 3) district office addresses.

Field Office	FY 2019 Total RR Customers within 50 Miles of Field Office	FY 2020 Total RR Customers within 50 Miles of Field Office	FY 2021 Total RR Customers within 50 Miles of Field Office
New Orleans, LA	2,903	2,871	2,771
Scranton, PA	2,993	2,912	2,828
Nashville, TN	3,014	2,915	2,838
Richmond, VA	3,241	3,153	3,045
Charlotte, NC	3,469	3,423	3,338
Spokane, WA	3,489	3,440	3,360
Decatur, IL	3,673	3,620	3,502
Buffalo, NY	4,015	3,809	3,611
Albany, NY	4,481	4,360	4,142
Oakland, CA	4,482	4,367	4,344
Denver, CO	4,954	4,928	4,718
Mesa, AZ	4,965	4,940	4,737
Salt Lake City, UT	5,079	4,945	4,779
Louisville, KY	5,174	5,006	4,847
Cincinnati, OH	5,413	5,253	5,084
Birmingham, AL	5,435	5,368	5,137
Indianapolis, IN	5,568	5,372	5,221
Roseville, CA	5,894	5,805	5,486
Cleveland, OH	5,956	5,822	5,622
Portland, OR	6,005	5,908	5,760
Seattle, WA	6,188	6,099	5,941
Harrisburg, PA	6,215	6,172	5,958
Detroit, MI	6,518	6,339	6,083
Tampa, FL	6,716	6,544	6,378
Boston, MA	6,782	6,651	6,522
Altoona, PA	6,859	6,708	6,633
Covina, CA	7,516	7,457	7,068
Roanoke, VA	7,653	7,482	7,196
New York, NY ^{a,b}	8,020	7,881	7,747
Little Rock, AR	8,076	8,002	7,772
Huntington, WV	8,273	8,028	7,783
St. Paul, MN	9,610	9,461	9,066
St. Louis, MO	9,991	9,760	9,390
Houston, TX	10,220	10,242	9,705
Joliet, IL ^c	10,385	10,368	10,075
Pittsburgh, PA	10,523	10,502	10,299
Baltimore, MD	10,678	10,547	11,004
Newark, NJ ^a	11,118	11,174	11,015
Atlanta, GA	11,173	11,236	11,257

Field Office	FY 2019 Total RR Customers within 50 Miles of Field Office	FY 2020 Total RR Customers within 50 Miles of Field Office	FY 2021 Total RR Customers within 50 Miles of Field Office
Omaha, NE	13,540	13,100	12,782
Jacksonville, FL	13,634	13,372	12,886
Fort Worth, TX	14,109	14,170	13,861
Kansas City, MO	15,251	15,273	15,124
Central Islip, NY ^b	15,434	15,488	15,642
Philadelphia, PA	19,046	19,064	18,984
Chicago, IL ^c	22,859	22,919	22,026

^a RRB offices located in New York, NY and Newark, NJ are 11.3 miles apart. Using a commuting distance of 50 miles results in double coverage between the two locations.

^b RRB offices located in New York, NY and Central Islip, NY are 48.5 miles apart. Using a commuting distance of 50 miles results in double coverage between the two locations.

^c RRB offices located in Chicago, IL and Joliet, IL are 45.9 miles apart. Using a commuting distance of 50 miles results in double coverage between the two locations.

Table 6 provides the number of walk-ins that each field office handled from FY 2019 through FY 2021. It should be noted that field offices were closed to walk-ins through FY 2021 and officially reopened for in-person service in April 2022.

Table 6: Walk-ins per Field Office Sorted Lowest to Highest for Fiscal Year 2019

Field Office	FY 2019 Walk-ins	FY 2020 Walk-ins	FY 2021 Walk-ins
Albany, NY	148	235	0
Milwaukee, WI	203	132	0
Pittsburgh, PA	242	144	0
Seattle, WA	254	155	0
Des Moines, IA	264	151	0
Tampa, FL	284	204	0
Harrisburg, PA	287	139	0
Detroit, MI	313	230	0
Cleveland, OH	321	192	0
Cincinnati, OH	359	264	47
Portland, OR	371	198	0
St. Paul, MN	381	301	0
Nashville, TN	409	194	0
Richmond, VA	427	276	0
Spokane, WA	434	269	0
Charlotte, NC	454	292	0
St. Louis, MO	468	414	3
Indianapolis, IN	486	198	0
Denver, CO	495	268	0
Scranton, PA	502	277	0
Oakland, CA	524	316	0

Field Office	FY 2019 Walk-ins	FY 2020 Walk-ins	FY 2021 Walk-ins
Fargo, ND	526	221	0
Baltimore, MD	545	304	0
Salt Lake City, UT	552	416	12
Newark, NJ	564	338	0
Wichita, KS	599	320	0
Atlanta, GA	609	396	0
Louisville, KY	633	355	0
Billings, MT	658	358	0
Boston, MA	718	346	0
Buffalo, NY	749	412	0
New Orleans, LA	753	322	0
Birmingham, AL	754	457	0
Duluth, MN	875	667	0
Albuquerque, NM	914	513	0
Houston, TX	954	623	0
Fort Worth, TX	968	571	0
Decatur, IL	1,012	637	0
Central Islip, NY	1,016	506	0
Little Rock, AR	1,102	689	0
Kansas City, MO	1,172	834	0
Mesa, AZ	1,258	662	0
Jacksonville, FL	1,264	616	0
Altoona, PA	1,608	1,031	0
Omaha, NE	1,689	826	0
Roanoke, VA	1,732	1,204	0
New York, NY	1,777	928	0
Philadelphia, PA	1,858	928	0
Chicago, IL	2,012	1,135	0
Roseville, CA	2,031	1,086	0
Huntington, WV	2,351	1,353	0
Joliet, IL	2,588	1,400	1
Covina, CA	2,653	1,473	0

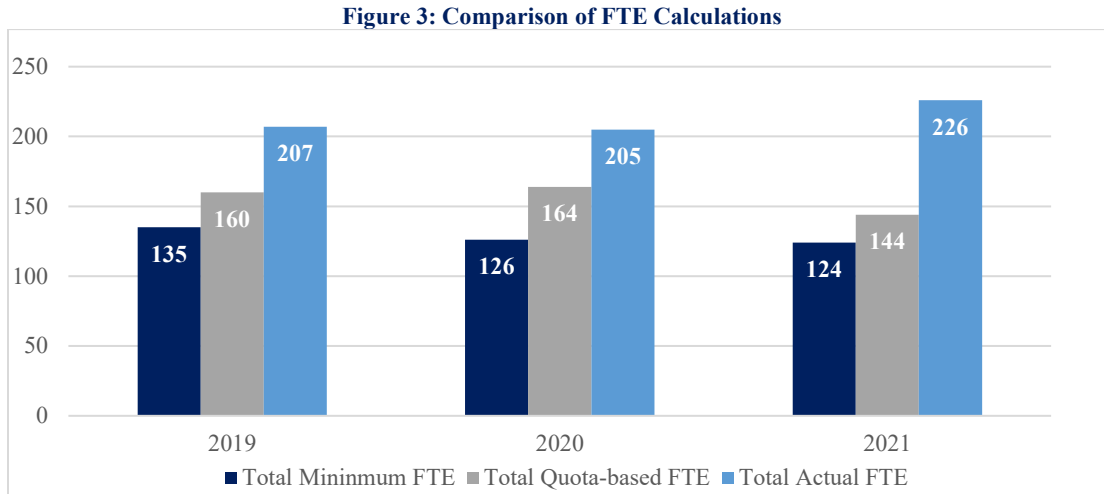
RMA determined that for fiscal years 2019 and 2020, there was a relationship between the number of railroad customers within 50 miles and the number of walk-ins. Therefore, as the number of customers within 50 miles of a field office increased, the number of walk-ins at the field office increased. However, for fiscal year 2021, there was no evidence that the customers within 50 miles were correlated with the number of walk-ins. In other words, there was no evidence that the number of customers within 50 miles of the field office caused walk-ins to increase or decrease in 2021. It is important to note that for 2021, there were only four field offices with walk-ins as a result of the COVID-19 pandemic.

While our analysis demonstrated that field offices with more customers in a 50-mile radius received more walk-in appointments, it should not be considered the sole justification for field offices. Our analysis did not account for the entirety of the work performed in field offices but rather provided insight into the utilization of walk-in appointments at field offices.

Appendix F: Calculated Number of Field Office Employees

Objective 7: Determine the optimal number of field service employees needed to address the needs and locations of the railroad community.

RMA has summarized the calculated minimum FTEs, FTEs based on the quota, and actual FTEs for each year in the scope of our audit (**Figure 3**).



Procedures and Supporting Information

In **Table 7**, RMA calculated the minimum number of FTEs for each field office for fiscal years 2019, 2020, and 2021. Total working hours, used to calculate the FTE, were based on time spent supporting calls, walk-ins, and quiet hours as provided by BFS on August 5, 2022, September 26, 2022, and December 8, 2022. The minimum FTEs were calculated using the total working hours divided by the minimum working hours in a calendar year. The minimum working hours were calculated by subtracting federal holidays, annual leave, and sick leave from the total work hours as established by OPM. The minimum number of hours that an FTE worked in one year are 1743 hours, 1743 hours, and 1727 hours for 2019, 2020, and 2021, respectively. In addition, RMA was provided the actual number of FTEs at each field office for fiscal years 2019, 2020, and 2021⁶⁷ by BFS on August 5, 2022.

⁶⁷ Source information included field office workloads for fiscal years 2019, 2020, and 2021.

Table 7: Minimum Number of FTEs Needed for Each Field Office Sorted Highest to Lowest for Fiscal Year 2021 Total Working Hours^{68,69}

Field Office	FY 2019 Total Working Hours	FY 2019 Minimum FTEs	FY 2019 Actual Number of FTEs	FY 2020 Total Working Hours	FY 2020 Minimum FTEs	FY 2020 Actual Number of FTEs	FY 2021 Total Working Hours	FY 2021 Minimum FTEs	FY 2021 Actual Number of FTEs
Chicago, IL	8,358.50	5	9	8,655.90	5	9	7,384.10	5	8
Jacksonville, FL	5,865.70	4	7	5,611.00	4	7	5,651.70	4	8
Detroit, MI	3,439.50	2	5	5,056.80	3	5	5,252.80	4	6
Charlotte, NC	4,527.70	3	6	4,880.00	3	6	5,248.90	4	8
Fort Worth, TX	5,295.90	4	5	4,816.80	3	6	5,080.20	3	7
Atlanta, GA	5,302.70	4	6	5,631.90	4	5	4,941.80	3	6
Denver, CO	4,805.50	3	6	4,513.20	3	6	4,757.10	3	8
Houston, TX	5,693.80	4	6	5,490.90	4	6	4,742.90	3	6
Cleveland, OH	5,147.90	3	6	4,955.00	3	6	4,567.70	3	6
Omaha, NE	6,013.00	4	6	5,136.80	3	6	4,509.60	3	6
Covina, CA	6,125.10	4	7	5,783.30	4	7	4,395.10	3	6
Indianapolis, IN	3,297.30	2	4	4,246.60	3	4	4,060.80	3	4
St. Louis, MO	6,518.20	4	7	4,744.30	3	6	4,002.30	3	5
Roanoke, VA	4,263.40	3	5	3,916.60	3	4	3,892.50	3	5
Kansas City, MO	4,828.50	3	5	4,521.80	3	5	3,865.70	3	5
Birmingham, AL	3,290.00	2	3	2,799.90	2	4	3,711.80	3	4
Salt Lake City, UT	3,664.30	3	4	3,449.00	2	4	3,583.10	3	5
Tampa, FL	4,406.10	3	5	4,544.60	3	5	3,548.70	3	4
Pittsburgh, PA	2,699.40	2	3	2,879.90	2	4	3,539.10	3	5
Scranton, PA	3,275.60	2	3	3,101.10	2	3	3,280.50	2	3
Nashville, TN	2,979.80	2	2	2,164.20	2	3	3,246.10	2	5
Mesa, AZ	4,156.70	3	4	3,499.20	3	4	3,242.70	2	5
Buffalo, NY	5,428.80	4	5	4,146.90	3	4	3,200.20	2	4
Newark, NJ	3,830.50	3	4	3,955.50	3	4	3,199.30	2	4
Harrisburg, PA	3,657.40	3	3	2,739.10	2	3	3,187.50	2	3
Joliet, IL	3,734.20	3	4	3,510.50	3	4	3,182.50	2	4
Central Islip, NY	3,963.20	3	4	3,077.70	2	3	3,165.00	2	4
Portland, OR	3,675.30	3	4	2,262.40	2	2	3,164.80	2	5
Philadelphia, PA	3,307.00	2	3	2,848.10	2	3	3,073.80	2	4
Huntington, WV	6,301.30	4	7	4,843.80	3	5	3,002.80	2	4
Cincinnati, OH	2,602.10	2	3	2,685.00	2	3	2,991.30	2	4
Boston, MA	2,819.90	2	3	2,998.20	2	4	2,911.10	2	4

⁶⁸ When calculating the minimum number of FTEs, all calculations were rounded up to the nearest whole number.

⁶⁹ Source information included workload and FSO Agent Queue Annual reports by field office.

Field Office	FY 2019 Total Working Hours	FY 2019 Minimum FTEs	FY 2019 Actual Number of FTEs	FY 2020 Total Working Hours	FY 2020 Minimum FTEs	FY 2020 Actual Number of FTEs	FY 2021 Total Working Hours	FY 2021 Minimum FTEs	FY 2021 Actual Number of FTEs
Duluth, MN	3,002.30	2	3	2,891.40	2	3	2,882.70	2	4
Roseville, CA	2,941.50	2	3	2,790.40	2	3	2,741.70	2	4
New Orleans, LA	1,671.20	1	2	3,702.50	3	5	2,543.60	2	3
Decatur, IL	3,299.20	2	3	2,514.10	2	3	2,475.10	2	4
Little Rock, AR	2,544.30	2	3	1,549.00	1	2	2,343.50	2	4
Richmond, VA	1,603.30	1	2	1,640.50	1	2	2,265.10	2	3
Baltimore, MD	3,933.40	3	4	2,841.40	2	2	2,149.80	2	3
Oakland, CA	2,181.20	2	3	1,516.50	1	2	2,142.60	2	4
New York, NY	1,361.30	1	1	1,496.50	1	2	2,100.90	2	3
Spokane, WA	1,997.70	2	3	2,317.10	2	3	2,091.60	2	3
Albuquerque, NM	2,612.80	2	3	2,144.60	2	3	2,072.60	2	3
Milwaukee, WI	1,676.90	1	2	2,784.80	2	3	1,909.40	2	2
Seattle, WA	1,425.70	1	2	1,285.60	1	2	1,828.10	2	3
Billings, MT	1,728.20	1	2	1,749.20	2	3	1,802.60	2	3
Louisville, KY	1,748.70	2	2	2,770.00	2	3	1,758.00	2	2
Wichita, KS	2,107.40	2	3	1,528.70	1	2	1,629.10	1	3
Fargo, ND	1,974.80	2	2	2,175.50	2	3	1,520.20	1	3
Altoona, PA	3,773.70	3	4	2,388.80	2	2	1,508.30	1	2
Albany, NY	753.1	1	1	1,111.50	1	2	1,352.10	1	2
Des Moines, IA	1,788.50	2	2	1,676.00	1	2	1,264.90	1	2
St. Paul, MN	2,890.10	2	3	2,579.20	2	3	970.2	1	1
Total		135	207		126	205		124	226

In **Table 8**, RMA calculated the FTEs based on a quota for the expected number of calls handled per day. RRB management provided the data for the total accepted calls on September 26, 2022. RRB network managers used a quota for several field offices.

Table 8: Number of FTEs for Each Field Office Sorted Highest to Lowest for Fiscal Year 2021 Total Accepted Calls Based on a Quota of 16 Calls per Day per FTE^{70,71}

Field Office	FY 2019 Total Accepted Calls	FY 2019 FTEs based on Quota	FY 2020 Total Accepted Calls	FY 2020 FTEs based on Quota	FY 2021 Total Accepted Calls	FY 2021 FTEs based on Quota
Chicago, IL	24,340	7	28,034	9	24,447	8
Atlanta, GA	17,137	5	21,756	7	17,344	6

⁷⁰ When calculating the number of FTEs based on a quota of 16 calls per day per FTE, calculations were rounded up to the nearest whole number.

⁷¹ Source information included the FSO Agent Queue Annual reports by field office.

Field Office	FY 2019 Total Accepted Calls	FY 2019 FTEs based on Quota	FY 2020 Total Accepted Calls	FY 2020 FTEs based on Quota	FY 2021 Total Accepted Calls	FY 2021 FTEs based on Quota
Houston, TX	19,240	6	18,748	6	15,170	5
Cleveland, OH	16,434	5	16,651	5	15,118	5
Buffalo, NY	20,821	6	18,561	6	13,977	5
Detroit, MI	7,174	3	13,670	4	13,082	4
Indianapolis, IN	7,851	3	13,883	4	12,184	4
Covina, CA	10,259	3	13,061	4	11,185	4
Jacksonville, FL	11,241	4	12,734	4	11,061	4
Scranton, PA	9,537	3	8,493	3	10,524	4
Fort Worth, TX	15,486	5	11,208	4	10,208	3
Birmingham, AL	10,674	4	5,558	2	10,093	3
Roanoke, VA	6,626	2	8,793	3	9,841	3
Joliet, IL	5,245	2	8,004	3	9,791	3
Central Islip, NY	9,124	3	9,827	3	9,650	3
Harrisburg, PA	11,610	4	6,984	3	9,575	3
Omaha, NE	16,444	5	12,032	4	9,483	3
Charlotte, NC	9,703	3	10,619	4	9,253	3
Philadelphia, PA	6,838	2	6,912	2	9,092	3
Kansas City, MO	12,167	4	11,430	4	9,068	3
Pittsburgh, PA	8,605	3	7,377	3	9,020	3
Tampa, FL	9,649	3	11,219	4	8,642	3
St. Louis, MO	15,146	5	10,592	4	8,621	3
Newark, NJ	8,676	3	11,147	4	8,516	3
Boston, MA	5,647	2	6,570	2	7,644	3
New Orleans, LA	3,228	1	8,506	3	7,117	3
Huntington, WV	10,971	4	10,869	4	6,851	2
Roseville, CA	5,348	2	5,925	2	6,732	2
Baltimore, MD	9,781	3	10,979	4	6,582	2
Nashville, TN	12,390	4	5,264	2	6,578	2
Denver, CO	10,035	3	9,924	3	6,524	2
Milwaukee, WI	5,697	2	9,982	3	6,329	2
Richmond, VA	2,945	1	3,954	2	6,268	2
Salt Lake City, UT	8,878	3	7,320	3	6,233	2
Cincinnati, OH	5,386	2	6,497	2	6,041	2
Duluth, MN	6,577	2	6,430	2	5,653	2
Albuquerque, NM	6,766	2	4,436	2	5,277	2
Louisville, KY	2,427	1	6,938	2	5,206	2
Little Rock, AR	5,943	2	4,224	2	5,197	2
Mesa, AZ	12,069	4	8,936	3	5,132	2

Field Office	FY 2019 Total Accepted Calls	FY 2019 FTEs based on Quota	FY 2020 Total Accepted Calls	FY 2020 FTEs based on Quota	FY 2021 Total Accepted Calls	FY 2021 FTEs based on Quota
Altoona, PA	10,888	4	8,634	3	5,119	2
Decatur, IL	8,719	3	5,424	2	4,564	2
Spokane, WA	2,602	1	4,414	2	4,428	2
Portland, OR	10,201	3	6,794	2	4,390	2
Albany, NY	1,824	1	4,253	2	3,756	2
Billings, MT	4,434	2	2,065	1	3,529	2
Des Moines, IA	5,644	2	5,528	2	2,997	1
New York, NY	4,493	2	1,711	1	2,901	1
St. Paul, MN	8,031	3	5,868	2	2,766	1
Seattle, WA	3,626	2	2,114	1	2,643	1
Oakland, CA	5,236	2	3,740	2	2,523	1
Wichita, KS	4,249	2	4,017	2	2,494	1
Fargo, ND	6,390	2	5,513	2	1,835	1
Total		160		164		144

Appendix G: Glossary of Acronyms

Acronym	Full Name
BAR	Bureau of the Actuary and Research
BFO	Bureau of Fiscal Operations
BFS	Bureau of Field Service
BIS	Bureau of Information Services
COBOL	Common Business Oriented Language
CFO	Chief Financial Officer
CFO Act	Chief Financial Officers Act of 1990
DBD	Disability Benefits Division
FRPC	Federal Real Property Council
FTE	Full-Time Employee
FY	Fiscal Year
GAO	Government Accountability Office
Green Book	Standards for Internal Control in the Federal Government
LEP	Limited English Proficiency
NARA	National Archives and Records Administration
OA	Office of Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
OP	Office of Programs
OPM	Office of Personnel Management
PEMS	Program Evaluation and Management Services
RMA	RMA Associates, LLC
RRA	Railroad Retirement Act
RRB	Railroad Retirement Board
RUIA	Railroad Unemployment Insurance Act
SSA	Social Security Administration
SRPO	Senior Real Property Officer
VA	U.S. Department of Veterans Affairs
VBA	Veteran Benefits Administration