



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

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Time and Attendance Fraud Not Identified for Employees on Extended Absence, But Matters of Concern Brought to EPA's Attention

Report No. 15-P-0167

June 15, 2015



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Report Contributors:

Angela Bennett
Jean Bloom
Safiya Chambers
Kevin Collins
Lisa McCowan
Leah Nikaidoh
Darren Schorer
Lela Wong

Abbreviations

AWL	Alternate Work Location
EPA	U.S. Environmental Protection Agency
IGEMS	Inspector General Enterprise Management System
OCFO	Office of the Chief Financial Officer
OEI	Office of Environmental Information
OIG	Office of Inspector General
RAC	Reasonable Accommodation

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EPA Office of Inspector General

1200 Pennsylvania Avenue, NW (2410T)
Washington, DC 20460
(202) 566-2391
www.epa.gov/oig

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At a Glance

Why We Did This Review

On August 27, 2013, a member of the Senate Committee on Environment and Public Works requested that the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), initiate work in connection with fraud committed by John C. Beale, a former Senior Policy Advisor with the EPA's Office of Air and Radiation. One of the areas we evaluated was the EPA's time and attendance process. This report addresses potential time and attendance fraud at the EPA in connection with employees who received salary payments while appearing to be on extended absence from their duties.

This report addresses the following EPA goal or cross-agency strategy:

- *Embracing EPA as a high-performing organization.*

Send all inquiries to our public affairs office at (202) 566-2391 or visit www.epa.gov/oig.

The full report is at: www.epa.gov/oig/reports/2015/20150615-15-P-0167.pdf

Time and Attendance Fraud Not Identified for Employees on Extended Absence, But Matters of Concern Brought to EPA's Attention

What We Found

Our audit did not identify any instances of time and attendance fraud for employees receiving salary payments while absent from their duties for an extended period of time. All employees interviewed provided evidence of login or had a valid explanation for not logging in to the agency's email system. We did not test for employees absent from their duties for less than 4 consecutive weeks; if our sample period was reduced to less than 4 consecutive weeks, additional issues may have been identified.

We identified concerns over the accuracy of time charges, use of a personal computer, and safety of telework space for reasonable accommodations.

We identified matters of concern that warrant the agency's attention. These matters pertain to:

- Accuracy of time charges in the PeoplePlus timekeeping system.
- Use of a personal computer to conduct official work.
- Safety of reasonable accommodation employees on fulltime telework.

We did not fully evaluate these matters because they are outside the scope of this audit. However, we are bringing these matters to the agency's attention due to the frequency of occurrences. In our professional judgment, the number of such occurrences is significant. We are bringing this to the agency's attention so that it can address the specific issues noted as appropriate.

Recommendation and Planned Agency Corrective Actions

We recommend that the Deputy Administrator address the concerns regarding the accuracy of time charges, use of personal computers for official work, and safety of telework space for reasonable accommodation employees. The agency concurred, has corrected the timekeeping errors, and is updating its policies and procedures to address the remaining matters.

Noteworthy Achievements

In response to our December 2013 early warning report on Beale, the agency identified corrective measures taken and planned regarding time and attendance. These measures included generating additional payroll reports for management review, conducting quarterly reviews and following up on employees who failed to enter their time three pay periods during the quarter, removing the group approval option in PeoplePlus, and amending the agency's time and attendance policy to eliminate system-generated default pay and mass approval processes.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

June 15, 2015

MEMORANDUM

SUBJECT: Time and Attendance Fraud Not Identified for Employees on Extended Absence,
But Matters of Concern Brought to EPA's Attention
Report No. 15-P-0167

FROM: Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is written over the printed name.

TO: A. Stanley Meiburg, Acting Deputy Administrator

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. In accordance with established audit-resolution procedures, EPA managers will make final determinations on matters in this report.

Action Required

In response to our discussion document, the agency provided an intended corrective actions plan that addresses the recommendation and establishes planned completion dates. Therefore, a response to the final report is not required. The agency should track unimplemented corrective actions in the Management Audit Tracking System.

This report will be available at <http://www.epa.gov/oig>.

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Purpose

We conducted this audit to identify potential time and attendance fraud at the U.S. Environmental Protection Agency (EPA) in connection with employees who received salary payments while on extended absence from their duties.

Background

On September 27, 2013, John C. Beale, a former Senior Policy Advisor with the EPA's Office of Air and Radiation, pleaded guilty to a federal charge stemming from a long-running scheme in which he defrauded the government in salary payments and other costs. From January 2000 to April 2013, Beale was absent from his duties at the EPA for about 2½ years but continued to receive his salary and benefits. On December 11, 2013, the EPA Office of Inspector General (OIG) issued an *Early Warning Report: Internal Controls and Management Actions Concerning John C. Beale Pay Issues*. The OIG report disclosed that one of the factors that facilitated Beale's fraud was the agency's lack of adequate controls over timekeeping. As a result, we initiated this audit to identify similar potential time and attendance fraud.

The EPA uses PeoplePlus as its official payroll system for reporting employee time and attendance. Employees are required to prepare biweekly time cards in PeoplePlus and attest to the accuracy of the data on the time cards. If employees cannot input their time, the timekeeper or approving official may prepare their time cards. Supervisors and managers are responsible for approving an employee's time once it has been attested or verified.

Employees must have an EPA-issued Active Directory Local Area Network user identification to log into the agency's computer network. Log-in authentication methods vary depending on the system. Access to PeoplePlus is authenticated through Novell Identity Vault and access to the agency's email system Outlook is through Active Directory. The agency's Active Directory database tracks all Outlook authentication, except for access through mobile phones, for approximately 6 months.

Responsible Offices

The EPA's Office of the Chief Financial Officer (OCFO) is responsible for formulating and providing time and attendance reporting policies. In addition, OCFO is responsible for the PeoplePlus system, including:

- Enforcing internal control policies and standards.
- Monitoring records to confirm that appropriate individuals are entering, attesting, submitting, verifying and approving time worked.
- Providing systems administration.
- Coordinating training.

The Office of Human Resources within the Office of Administration and Resources Management is responsible for providing policies and guidance on employment, pay and leave administration, and employee conduct. The Office of Human Resources also maintains data on employment and pay status.

The Office of Environmental Information (OEI) is responsible for maintaining the Active Directory database. OEI is also the agency's focal point for collecting, managing, providing and safeguarding environmental information. This includes establishing policies for the agency's information security and records management and overseeing the implementation of these policies.

Other OIG Audits

The OIG recently issued audit reports related to other aspects of time and attendance. These reports pertain to EPA employees on administrative leave, OIG compliance with its internal time and attendance reporting requirements, and OIG compliance with overtime policies. These reports are discussed in Appendix A.

Noteworthy Achievements

In response to our December 2013 early warning report on Beale, the agency identified corrective measures taken and planned regarding time and attendance.¹ These corrective measures include:

- Generating reports each pay period to identify and follow up on instances where the employee's time was not entered by the employee or his/her timekeeper, or were not approved by his/her supervisor or approver.
- Conducting quarterly reviews and following up on employees who failed to enter their time three pay periods during the quarter, and those instances where the time was approved by someone other than the employees' direct supervisors more than three times during the quarter.
- Removing the group approval option from PeoplePlus and requiring managers to approve each time card individually.
- Amending the agency's time and attendance policy to eliminate system-generated default pay and mass approval processes. The revised policy was implemented in June 2014 with the migration to the EPA's new payroll service provider—the Interior Business Center—which is a division of the U.S. Department of the Interior.

The OIG has not audited the above corrective measures reported by the agency; therefore, we are unable to provide, and we do not provide, any conclusions or opinions regarding the effectiveness of these corrective measures.

¹ Report of Evaluation and Corrective Actions, dated December 5, 2013, issued by former Deputy Administrator Bob Perciasepe to the OIG.

Scope and Methodology

We conducted this audit from November 5, 2013, to March 20, 2015, in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

To assess the risk of employees receiving salary payments while absent from their duties, we evaluated the agency's time and attendance policies. We also discussed the controls for time card review and approval with agency officials. Based on our evaluation and discussion, the controls over time and attendance vary depending on the time card approver. The approvers are usually at the supervisor or manager level. Each approver would have at least one alternate approver and a timekeeper. The EPA estimated that it has more than 3,300 supervisors, managers and timekeepers. Because of the large number of control points and lack of consistency among time card approvers, testing of the individual controls would be cost prohibitive and ineffective for projecting results. As a result, we decided to base our conclusions on substantive testing rather than trying to test the varying internal controls; we designed a substantive test to cover the maximum assumed control risk.

We selected two sample periods for testing—November 2013 and May 2014. Each sample period represents two consecutive pay periods, or 4 weeks. For each sample period, we compared employees who received salary payments to those who logged into the agency's email system—Outlook—at least once. We identified the employees receiving salary payments from the agency's accounting system—Compass Data Warehouse. To identify the employees who logged into Outlook, we used the Active Directory login data and computer user identification provided by OEI. Based on the comparison, we identified the initial exceptions for follow-up. We then used a multi-phased process to identify and eliminate any false exceptions (i.e., exceptions that could be justified or explained). We interviewed approximately 54 percent of the remaining employees to determine whether they could provide evidence that they logged into the agency's systems, or an explanation for not logging in. Details of our sampling methodology are in Appendix B.

The purpose of this audit was to identify potential time and attendance fraud at the EPA where employees may have received salary payments while on extended absence from their duties. We did not audit the agency's overall time and attendance system or payroll system and the related controls. As a result, we are unable to provide, and we do not provide, any conclusions or opinions regarding the agency's internal controls over time and attendance and payroll.

Results of Review

Time and Attendance Fraud Not Identified for Employees on Extended Absence

Our audit did not identify any instances of time and attendance fraud for employees receiving salary payments while absent from their duties for an extended period of time. All employees interviewed provided evidence of login or had a valid explanation for not logging into the agency's email system.

We interviewed 63 employees, of which 11 did not log into the network during our sample periods. One of the 11 employees chose to not log into the system unless necessary and he did not access the network during one of our sample periods. The remaining 10 employees were on extended sick leave, on temporary duty through Intergovernmental Personnel Action, or unable to access the system.

The remaining 52 employees were false positives. Five of the employees came up as exceptions because their user names changed, and we confirmed that the employees had logged into the network under their prior user names. Data obtained during interviews show that the remaining 47 employees also logged into the network and accessed Outlook.

We did not test for employees who were absent from their duties for less than 4 consecutive weeks; if our sample period was reduced to less than 4 consecutive weeks, additional issues may have been identified.

Additional Matters of Concern

We identified additional matters of concern that warrant the agency's attention. These matters pertain to the:

- Accuracy of time charges in PeoplePlus.
- Use of a personal computer to conduct official work.
- Safety of reasonable accommodation (RAC) employees on fulltime telework.

We did not fully evaluate these matters because they are outside the scope of this audit. However, we are bringing these matters to the agency's attention due to the frequency of occurrences. In our professional judgment, the number of such occurrences (11 percent, or seven occurrences of the total sample size of 63) is significant. We are bringing this to the agency's attention so that it can address the specific issues noted as appropriate.

Accuracy of Time Charges in PeoplePlus

Of the 63 employees interviewed, we identified three with a time card error. The three employees were on extended leave. However, the approved time cards showed the employees working regular hours, resulting in an overstatement of the employees' leave balances. In all three cases, the time cards were prepared by someone other than the employee.

One of the errors was detected by the employee upon her return from extended sick leave. The error was for the pay period ended May 17, 2014. The employee initiated a request for correction and the leave balance was corrected during the pay period ended September 6, 2014. The remaining two errors—one each in Region 5 and Region 9—were for the pay period ended November 30, 2013. The OIG notified agency officials in December 2014 and January 2015, respectively, and management officials took actions to correct the errors. In addition, Region 9 management issued new standard operating procedures to ensure similar errors would be detected and prevented in the future. The new standard operating procedures outline steps for the timekeeper to verify time card entries and monitor employee corrections.

Use of Personal Computer to Conduct Official Work

One of the interviewed employees chose to use his personal computer and tablet to conduct official work. The employee did not use his EPA-issued computer even when working in the office; the employee connected to the EPA network using his personal computer and/or tablet. His work, including any documents downloaded from the network, were stored in his personal computer and/or tablet. The employee emailed his work products to his supervisor from his personal devices using a personal email account. To meet records management requirements, the employee copied the emails to his work email account.

According to the agency's *Information Security – Interim Access Control Procedures V3.2*, dated July 13, 2012, all non-EPA mobile devices are prohibited from connecting to an EPA network unless the device has been approved, scanned and inspected. Mobile devices include portable computing and communications devices with information storage capability, such as notebook/tablet/laptop computers and personal digital assistants. The EPA's *Mobile Computing Policy: 6.1 Mobile Computing Requirements* states that EPA employees or other users who are granted permission to use the EPA's network must use government-furnished information management and technology solutions to access the EPA's network outside of the EPA's secured physical location, and states that no waivers will be accepted from the requirements of this policy.

Based on our review of the two policies, there appears to be a conflict regarding the use of personal computers for conducting EPA work. The *Information Security Procedures* appear to allow the use of a non-EPA device as long as the non-EPA device has been properly approved, scanned and encrypted. However, the *Mobile*

Computing Policy requires employees to use government-furnished devices when working remotely.

The agency explained that the two policies do not conflict. Both policies allow the employee to either use EPA-furnished equipment to directly access the EPA network, or use non-EPA equipment to connect to the resources on the EPA network through an EPA technology solution (such as the EPA's remote access solution). Employees are not allowed to directly access the EPA network using personal devices. The agency stated that the *Access Control Procedure* is in the process of being revised to mirror the language of the *Mobile Computing Policy*.

Safety of Employees on Reasonable Accommodation Telework

Of the 63 employees interviewed, the EPA had approved seven employees for fulltime RAC telework. We conducted interviews with these employees at their residences in the same manner and for the same purpose as those conducted with non-RAC employees at their EPA offices.

For three of the seven employees, we observed potentially unsafe conditions within the employee's work space and general work environment. We observed extremely cluttered and poorly lit work spaces, and pathways to the workspaces filled with boxes and miscellaneous items that made movement difficult and potentially unsafe. We believe the conditions observed put the employees at risk of injury and the agency at risk for potential liability claims if injury occurs. We discussed our concerns with the employees' supervisors, and they were unaware of the potentially unsafe conditions.

The supervisors provided us with the employees' approved telework agreements and the self-certification safety checklists on file. The supervisors also indicated that they had never conducted site visits to the employees' residences. The safety checklist is designed to assess the overall safety of the alternate work location (AWL) and must be completed by the employee and given to the employee's supervisor with the telework application. The form states that signing the form does not guarantee that the AWL is hazard free, but does verify that the employee has made a reasonably careful inspection for potential hazards. The form also states that the employees are responsible for informing their supervisors of any changes to their AWL which could impact on health and safety of the employee and others.

Based on the OIG's observations during the interviews, we believe that the employees are in potential noncompliance with some or all of the following checklist items shown in Table 1.

Table 1: Potential noncompliance items based on OIG observations

Checklist item no.	Checklist description
13.	Are aisles, doorways and corners free of obstructions to permit visibility and movement?
17.	Are the phone lines, electrical cords, and extension wires safely secured?
19.	Is there adequate electrical lighting to accomplish work assignments?

Source: EPA Flexiplace Policy, Employee Self-Certification Safety Checklist.

Our review of the safety checklists for the three employees showed that the employees had marked “yes” to each of the items in Table 1. Since the supervisors were unaware of the potentially unsafe conditions, we can assume that the employees did not provide notification of changes to their AWL, as agreed to by signing the form.

We reviewed the agency’s telework policy to determine whether telework requirements—including the employee self-certification safety checklist—are applicable to employees on RAC telework. Our review showed no specific reference to RAC telework.

The agency clarified that all governing telework policies and procedures apply to employees who telework as a RAC, unless these policies and procedures are modified by virtue of the disability/accommodation. The agency stated that any policy change involving employees who telework as a RAC would need to be a collaborative effort between the Office of Human Resources and the Office of Civil Rights and subject to bargaining requirements pursuant to collective bargaining agreements. The agency has been working with the American Federation of Government Employees—the EPA’s largest union—on an agreement that will confirm that employees teleworking as a RAC are required to meet telework recertification requirements, including annual safety checklist recertification.

Recommendation

We recommend that the Deputy Administrator:

1. Address the specific matters of concern noted in this report pertaining to:
 - Accuracy of time charges in PeoplePlus.
 - Use of a personal computer to conduct official work.
 - Safety of the work space for employees on RAC telework.

Agency Comments and OIG Evaluation

A discussion document was provided to the agency for comment on March 20, 2015. The agency provided us its initial response on April 9, 2015, and we held a final exit conference with agency officials on April 23, 2015. The agency followed up with a formal response on May 4, 2015.

The agency concurred with our recommendation and has corrected the timekeeping errors identified. The agency is currently updating its network access control procedures and evaluating its telework policies to address our concerns regarding the use of personal computers for official work and the safety of RAC employees.

The agency's full response to our discussion draft is in Appendix C of this report.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	7	Address the specific matters of concern noted in this report pertaining to: <ul style="list-style-type: none"> • Accuracy of time charges in PeoplePlus. • Use of a personal computer to conduct official work. • Safety of the work space for employees on RAC telework. 	O	Deputy Administrator	4/30/16		

¹ O = Recommendation is open with agreed-to corrective actions pending.

C = Recommendation is closed with all agreed-to actions completed.

U = Recommendation is unresolved with resolution efforts in progress.

Prior OIG Reports Related to Time and Attendance

In addition to the Beale report, the OIG recently issued three other reports related to time and attendance, as follows.

Early Warning Report: Some EPA Employees Found to Be on Paid Administrative Leave for Years (15-N-0025), issued November 19, 2014

This report identified eight employees who had recorded significant amounts of administrative leave. We issued the report to provide the information to the EPA Administrator.

No recommendations were made.

<http://www.epa.gov/oig/reports/2014/20141119-15-N-0025.pdf>.

EPA OIG Not Fully Compliant With OIG Policy on Time and Attendance Reporting (15-B-0074), issued February 4, 2015

The audit noted that the OIG did not always comply with its policy for using its Inspector General Enterprise Management System (IGEMS) as the official internal system for recording time and attendance in both its planning and timesheet modules. As a result, some employees did not submit or have approved planned or actual timesheets in IGEMS when required under OIG policy. This occurred because the policy needed clarity and OIG employees did not appear to view IGEMS time and attendance recording as a high priority. We recommended that the Deputy Inspector General require employees and management to correct the instances of noncompliance identified and review future IGEMS records for appropriateness, and review pertinent policy. The Deputy Inspector General agreed with our recommendations and provided corrective actions and planned completion dates to address all recommendations.

<http://www.epa.gov/oig/reports/2015/20150204-15-B-0074.pdf>.

EPA OIG Not Fully Compliant With Overtime Policies (15-B-0075), issued February 4, 2015

The audit disclosed that the OIG did not always use EPA Form 2560-7, *Request for Authorization of Overtime Work*, for overtime requests and authorization as required by EPA *Pay Administration Manual 3155*. Also, the OIG did not always comply with its own policy on the use of the planned timesheet for advance approval of overtime. This occurred because OIG management did not provide sufficient oversight, and OIG policies were not clear. We also noted the OIG did not retain EPA authorization forms supporting overtime requests. We recommended that the Deputy Inspector General revise OIG policy as needed and emphasize EPA policy to staff. The Deputy Inspector General agreed with our recommendations and provided corrective actions and planned completion dates to address all recommendations.

<http://www.epa.gov/oig/reports/2015/20150204-15-B-0075.pdf>

Sampling Methodology

The purpose of our sample testing was to identify employees who potentially received salary payments while absent from their duties for an extended period of time. We held numerous discussions with representatives from OEI, OCFO, and the Office of Administration and Resources Management to determine the availability of data and potential testing methodologies.

Based on these discussions, we developed the most feasible test to address our purpose. We shared our methodology with the agency and addressed its concerns. We also solicited ideas from the agency for alternative testing methodologies, but the agency provided no suggestions. The agency agreed with our general sampling methodology.

We selected two sample periods for testing—November 2013 and May 2014. Each sample period represented two consecutive pay periods, or 4 weeks. For each sample period, we compared payroll to computer login records to identify employees who received salary payments but had not logged into the agency's email system (Outlook) at least once. We based the test on the assumptions that if employees are logged into the agency's email system, there is some assurance that the employees are present to perform their duties.

For the sample periods November 2013 and May 2014, the number of employees receiving salary payments totaled 16,116 and 15,355, respectively, according to the agency's Compass Data Warehouse accounting system. We used the Active Directory login data and computer user names provided by OEI to identify employees who logged into the email system. Anyone who received a salary payment but had not logged into the system at least once during the sample period was identified as an exception. Initially, we identified 528 exceptions. We used a multi-phased process to identify and eliminate "false exceptions" (i.e., any exceptions that could be readily justified or explained). We reviewed time cards, personnel records, and additional information provided by the agency. Examples of a justified basis for the eliminations included:

- Employees who were on payroll but charged zero hours.
- Employees who were on leave most of the time.
- Special government employees who were hired on an as-needed basis and not issued a government computer for logging into the EPA's systems regularly.
- Employees who mistakenly came up in the initial exceptions due to computer user name changes.
- Employees who had an employment status change during the sample periods.
- Employees who were double counted because they were exceptions for both sample periods.

As a result of these justifications, we eliminated 412 exceptions from further review, reducing the exceptions requiring follow-up to 116. Based on employee availabilities and further risk assessment, we interviewed 63 employees, or 54 percent of our remaining 116 exceptions. We conducted the interviews to determine whether the employees actually logged into the agency's email system and to identify explanations for those who did not log in.

Agency Response to Discussion Draft

May 4, 2015

MEMORANDUM

SUBJECT: EPA Comments on Discussion Draft, *“No Instances of Time and Attendance Fraud Identified, But Other Matters of Concern Brought to EPA’s Attention,”* dated March 20, 2015

FROM: Stefan Silzer, Director */signed/*
Office of Financial Management

TO: Robert Adachi, Director
Forensic Audits
Office of Audits

Thank you for the opportunity to review the subject Discussion Draft. Below is a summary of the agency’s comments regarding the factual accuracy of the information, conclusions, and recommendations contained therein.

AGENCY’S COMMENTS ON DISCUSSION DRAFT LANGUAGE

OIG Issue: *“Safety of Employees on Reasonable Accommodation Telework”*

Agency Comments:

- All governing telework policies and procedures apply to employees that telework as a reasonable accommodation unless these policies and procedures are modified by virtue of the disability/accommodation.
- The safety checklist represents the employee’s signed certification that they have inspected their alternative work location (AWL) for potential hazards and that it is a safe space; however, this certification states that signing the form “does not guarantee that the AWL is hazard free.” The certification requires employees to inform their supervisors of any changes to their AWL which could impact their health and safety.
- Any policy change involving employees that telework as a reasonable accommodation would need to be a collaborative effort between OHR and OCR (who handles agency RA matters) and are subject to bargaining requirements pursuant to collective bargaining agreements.
- The Agency has been working with AFGE, EPA’s largest Union on an agreement that will confirm that employees teleworking as a reasonable accommodation are required to

meet telework recertification requirements, including annual safety checklist recertification.

AGENCY’S RESPONSE TO RECOMMENDATIONS

The agency concurs with the Discussion Draft recommendation.

Agreements

No.	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion by Quarter and FY
1	Address the specific matters of concern noted in this report pertaining to: <ul style="list-style-type: none"> • Accuracy of time charges in PeoplePlus • Use of a personal computer to conduct official work • Safety of the work space for employees on RAC telework 	1.1 The discussion draft identified 3 employees with timecard errors. Corrections to these timecards have been made by the employees and approved by their supervisors.	Complete
		1.2 A revised access control procedure is currently undergoing Agency wide review and is expected to be signed by the CIO later this year. The new access control procedure states that “users shall connect non-EPA owned mobile devices only to authorized EPA information management and technology solutions.”	September 30, 2015
		1.3 The agency will evaluate its telework policies and procedures related to reasonable accommodations and modify them, as needed, to ensure the safety of the work space for employees on RAC telework. Note that changes to RAC/ telework may be subject to the collective bargaining agreements.	April 30, 2016

cc: David Bloom
Renee Wynn
Donna Vizian
Kevin Minoli
John Reeder
Jeanne Conklin
John Showman
Meshell Jones-Peeler
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