



Office of Audits  
Office of Inspector General  
U.S. General Services Administration

# GSA's Program for Managing Virtual Employees and Teleworkers Needs Improvement

*Report Number A130019/C/6/F15001  
January 16, 2015*



Office of Audits  
Office of Inspector General  
U.S. General Services Administration

## REPORT ABSTRACT

### OBJECTIVE

Our objective was to determine whether GSA has sufficient controls over its program for virtual employees and teleworkers to ensure compliance with laws, regulations, policies, and procedures.

**Heartland Region  
Audit Office**  
1500 E. Bannister  
Road, Suite 2075  
Kansas City, MO  
64131  
(816) 926-7052

### GSA's Program for Managing Virtual Employees and Teleworkers Needs Improvement

Report Number A130019/C/6/F15001

January 16, 2015

#### WHAT WE FOUND

Finding 1 – GSA does not know the number of virtual employees it has, and some virtual employee work arrangements were not fully approved.

Finding 2 – Travel costs related to virtual work arrangements were not assessed annually.

Finding 3 – Official duty stations were incorrect for some virtual employees.

Finding 4 – Virtual employee hours were not accurately reported.

Finding 5 – GSA needs to improve controls over transit subsidies.

Finding 6 – Many GSA teleworkers have not taken the required training.

#### WHAT WE RECOMMEND

We recommend that the Chief Human Capital Officer:

1. Implement controls to ensure compliance with GSA Chief People Officer (CPO) Instructional Letter (IL) 12-04; specifically:
  - a. Ensure all virtual employees have properly approved arrangements.
  - b. Ensure all virtual arrangements are reviewed annually by appropriate levels of management. The review should include comparison of actual to estimated travel costs and evaluation of whether current travel policies and budgets can adequately support the virtual arrangement.
  - c. Establish controls to maintain an accurate list of virtual employees.
2. Verify official duty stations for all virtual employees and correct any errors, including collection of amounts owed or payment of amounts due.
3. Enhance controls over timekeeping; specifically:
  - a. Ensure that GSA employees and timekeepers correctly record telework time.
  - b. Consider establishing a separate time and attendance code for virtual employees.
4. Enhance controls over transit subsidies; specifically:
  - a. Review approved transit subsidy recipients to ensure that virtual employees are not receiving transit benefits and collect any overpayments from the employees.
  - b. Remind GSA employees that regularly scheduled telework days are to be deducted when computing requested subsidy amounts and that they are to notify their regional telework coordinator if their telework status changes.
5. Ensure that GSA employees complete required telework training in accordance with GSA policy prior to beginning or continuing to telework. Employees failing to complete all required telework training within a reasonable time should be removed from telework.
6. Incorporate the requirements of CPO IL-12-04 into required telework training courses.

#### MANAGEMENT COMMENTS

The Chief Human Capital Officer concurred with our recommendations. Management's comments can be found in their entirety in **Appendix B**.



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**Office of Audits  
Office of Inspector General  
U.S. General Services Administration**

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DATE: January 16, 2015

TO: Antonia T. Harris  
Chief Human Capital Officer (C)

FROM: Erin P. Priddy *Erin P. Priddy*  
Audit Manager, Heartland Region Audit Office (JA-6)

SUBJECT: GSA's Program for Managing Virtual Employees and Teleworkers  
Needs Improvement  
*Report Number A130019/C/6/F15001*

This report presents the results of our audit of GSA's telework program. Our findings and recommendations are summarized in the Report Abstract. Instructions regarding the audit resolution process can be found in the email that transmitted this report.

Your written comments to the draft report are included in **Appendix B** of this report.

If you have any questions regarding this report, please contact me or the Auditor-in-Charge at the following:

Erin P. Priddy	Audit Manager	<a href="mailto:erin.priddy@gsaig.gov">erin.priddy@gsaig.gov</a>	(816) 926-8610
John Pollock	Auditor-In-Charge	<a href="mailto:john.pollock@gsaig.gov">john.pollock@gsaig.gov</a>	(816) 926-8616

I would like to thank you and your staff for your assistance during this audit.

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## Introduction

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Telework was authorized in 2000 by Public Law 106–346, which states, “Each executive agency shall establish a policy under which eligible employees of the agency may participate in telecommuting to the maximum extent possible without diminished employee performance.” Public Law 111-292, the Telework Enhancement Act of 2010, further encourages telework and defines the structure surrounding it by requiring executive agencies to have a written agreement with each teleworking employee, a Telework Managing Officer, and an annual report on telework.

GSA’s Mobility and Telework Policy states that GSA supports the broadest possible use of telework, including full-time telework, by eligible Agency employees. Over 10,000 GSA employees (78 percent) charged time to telework from August 2012 to July 2013.

Telework is an arrangement whereby employees perform their duties from an approved worksite that differs from the Agency worksite where they would otherwise work (often the employee’s home). Full-time teleworkers are referred to as virtual employees, and their alternate worksite becomes their official duty station for purposes of locality pay and travel reimbursement.

In 2012, there were several media reports on excessive travel by virtual GSA employees. GSA’s Chief People Officer<sup>1</sup> (CPO) issued Instructional Letter (IL), Virtual and Satellite Work Arrangements (CPO IL-12-04), on August 1, 2012, to provide improved controls over approval of virtual arrangements. The IL provided additional guidance for GSA in establishing: (1) the criteria and process for assessment, approval, and management of all new virtual work arrangements for current and new GSA employees; (2) the requirement for development and management of a virtual travel budget for all virtual work arrangements; (3) the criteria and process for termination of virtual work arrangements; (4) the requirement for annual review of virtual work arrangements; and (5) the requirement for review of all currently existing virtual work arrangements within 60 days of the date of the IL.

The IL requires the approving official to approve: the Agency worksite for the position; the official worksite/duty station of the virtual employee; the annual cost to travel to the Agency worksite (which becomes the employee’s virtual travel budget); the overall direct cost (or savings) of the virtual work arrangement; and the justification for the virtual work arrangement. Work arrangements in which the total direct costs are more than 10 percent higher than the costs would be if the employee were located at the Agency worksite must be approved by the CPO, the Chief Financial Officer, and the GSA Administrator.

## Objective

Our objective was to determine whether GSA has sufficient controls over its program for virtual employees and teleworkers to ensure compliance with laws, regulations, policies, and procedures. See **Appendix A** for additional details.

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<sup>1</sup> Now known as Chief Human Capital Officer.

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## Results

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### **Finding 1 – GSA does not know the number of virtual employees it has, and some virtual employee work arrangements were not fully approved.**

GSA does not know how many virtual employees it has, and some virtual employees did not have fully approved work arrangements in place.

GSA policy (CPO IL-12-04) requires that the Office of the Chief People Officer (OCPO)<sup>2</sup> maintain the master tracking of all GSA virtual employees and that all virtual work arrangements be reviewed annually. The OCPO maintains a list of virtual and satellite<sup>3</sup> employees and whether they have approved work arrangements. At the time of our review, the list contained 454 names; however, the OCPO did not know whether the employees were virtual or satellite. In addition, the OCPO was uncertain of the accuracy of the list because it was based a manual data call.

Since GSA did not know which GSA employees were virtual, we used several techniques to identify virtual employees. The audit procedures were not intended to identify a complete universe of virtual employees, rather, to identify a set of confirmed virtual employees to test GSA's compliance with the requirements outlined in CPO IL-12-04. We were able to identify 76 virtual employees based on the following method:

- Of the GSA employees that were on the OCPO's list of virtual and satellite employees, we identified employees with significant travel and significant telework hours.<sup>4</sup> Based on this methodology, we contacted 102 of the 454 individuals on the OCPO list. Through this process, we determined that 57 of the 102 were working as virtual employees.<sup>5</sup>
- We also identified GSA employees who were not on the OCPO list of virtual and satellite employees but recorded significant telework hours. Based on our contact with these individuals, we identified another 19 employees who were working in a virtual capacity, for an overall total of 76.

For 19 of the 76, there was no evidence of a completed GSA Form 3703, Virtual and Satellite Work Arrangement Analysis Tool. This form is required by CPO IL-12-04 and documents estimated costs associated with the proposed arrangement and required approvals. All 19 employees had been working as virtual employees for over 1 year.

Although a GSA Form 3703 had been prepared for the remaining 57 virtual employees, documentation indicated that the forms were not fully approved as required by CPO IL-12-04. For example, documentation indicated that the arrangement for one virtual

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<sup>2</sup> Now known as the Office of Human Resources Management.

<sup>3</sup> Satellite employees work at a GSA facility that is different from the organization for which they work.

<sup>4</sup> We considered more than 1,600 telework hours from August 2012 to July 2013 and/or 80 telework hours in specific pay periods to be significant.

<sup>5</sup> The other 45 were satellite employees.

employee was not approved by the Administrator, when CPO IL-12-04 required it. The OCPO should ensure GSA employees working in a virtual status are properly approved.

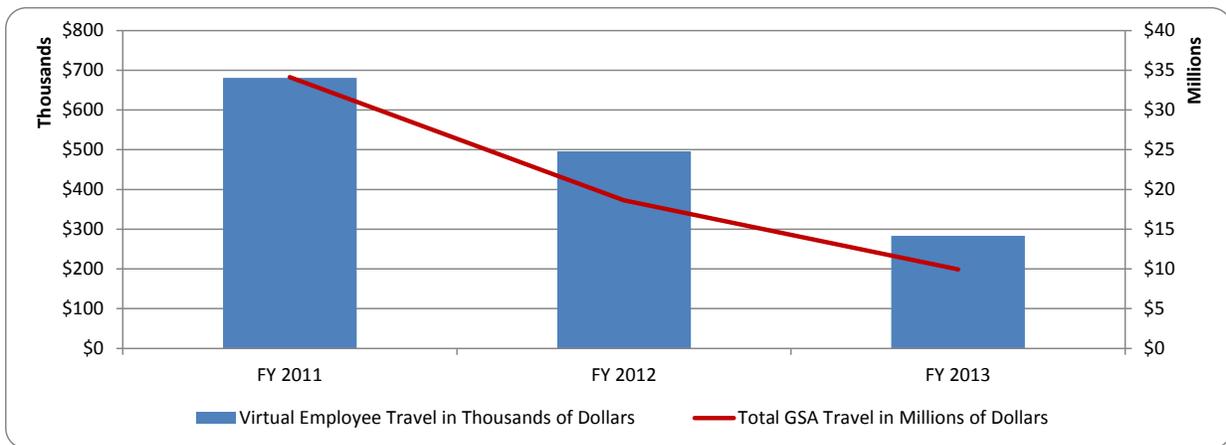
**Finding 2 – Travel costs related to virtual work arrangements were not assessed annually.**

Travel costs for some virtual employees have significantly exceeded the estimates upon which the virtual work arrangement was approved. In addition, some virtual employees advised that travel restrictions have affected their ability to perform their duties.

Travel expenses are an important part of the cost-benefit analysis for determining whether an employee’s virtual work arrangement should be approved or continued. Virtual employees incur reimbursable travel from their duty station to the Agency worksite to effectively perform their official duties and meet mission requirements. We reviewed fiscal years (FYs) 2012 and 2013 travel costs for the 57 employees who had submitted a GSA Form 3703. For 29 of the 57 virtual employees, actual travel costs to the Agency worksite exceeded the cost estimates reflected on the forms. For 13 employees, the actual costs were more than double the estimate. In some instances, the increase in travel costs would require additional justification and a higher level of management approval to continue the virtual work arrangement; there was no evidence of this approval.

Conversely, some virtual employees and a GSA supervisor indicated that restricted travel throughout the Agency since FY 2012 had negatively affected their ability to perform their duties effectively. As demonstrated in *Figure 1*, GSA travel costs declined dramatically for virtual employees and the Agency as a whole from FY 2011 to 2013.

**Figure 1 – Decline in Virtual Employee Travel Mirrors Overall Agency Decline**



GSA should annually reassess its virtual work arrangements while taking into consideration estimated and actual travel costs to meet mission requirements and determine whether it is in the best interest of the Agency to continue or terminate the virtual work arrangements.

### **Finding 3 – Official duty stations were incorrect for some virtual employees.**

Official duty stations were incorrect for 24 (32 percent) of the 76 virtual employees we identified. However, the errors resulted in incorrect pay to the virtual employee in only two instances. One employee was underpaid by \$4,323, and the other employee was overpaid by \$7,883 in FY 2013.<sup>6</sup>

All GSA employees are assigned an official duty station in GSA's time and attendance and personnel management systems. Duty station accuracy is critical because it determines locality pay and eligibility for travel reimbursement to the Agency worksite. Accordingly, GSA should verify official duty stations for all virtual employees and correct any errors, including collection of amounts owed or payment of amounts due.

### **Finding 4 – Virtual employee hours were not accurately reported.**

We found that some virtual employees were not using the correct telework codes to properly record their hours worked. This caused inaccuracies in telework data GSA reported to the Office of Personnel Management.

In accordance with the Telework Enhancement Act of 2010, the Office of Personnel Management issues an annual report to Congress presenting various quantitative and qualitative information on the status of telework in the federal government. The primary basis for the data presented in the report is a data call to the agencies. GSA relies on the recorded telework data in its time and attendance system to respond to the Office of Personnel Management's data call.

For the 76 virtual employees we identified, 63 (83 percent) properly recorded their time in GSA's time and attendance system.<sup>7</sup> For the remaining 13 employees, 10 recorded only a limited number of telework hours and 3 did not use a telework code at all.

In addition, we noted that GSA's time and attendance system does not have a unique code to identify virtual employees. This contributed to the OCPO's inability to provide a definitive list of the Agency's virtual employees. Considering the potential effect on travel costs, locality pay, and reporting requirements, GSA should consider establishing a code that would facilitate identification and monitoring of virtual employees.

### **Finding 5 – GSA needs to improve controls over transit subsidies.**

Controls over transit subsidies have improved in recent years through the use of smart cards where unspent monthly allowances drop off the card automatically. However, we identified some errors that indicate GSA could further strengthen these controls.

GSA's Desk Guide to Mobility and Telework, dated December 9, 2011, states that transit subsidies are provided specifically for the use of GSA employees commuting to

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<sup>6</sup> The incorrect duty stations did not have a direct impact on travel reimbursements.

<sup>7</sup> GSA timekeeping procedures include four telework codes: 90 - Telework-Period Intermittent, 91 - Telework-Short Term, 92 - Telework-Long Term, or 93 - Telecommuting Center.

and from work by public transportation. Therefore, employees should not claim transit benefits for days they will be teleworking.

Some transit subsidy beneficiaries received excess subsidies because the employees' transit subsidy requests did not reflect telework time.<sup>8</sup> Additionally, we identified a virtual employee in Chicago who received a transit subsidy in June 2013; however, virtual employees are ineligible for transit subsidies since they telework 100 percent of their time.

GSA should review approved transit subsidy recipients to ensure that virtual employees are not receiving transit benefits and collect any overpayments from the employees. GSA should also remind GSA employees that regularly scheduled telework days are to be deducted when computing requested subsidy amounts and that they are to notify their regional telework coordinator if their telework status changes.

### **Finding 6 – Many GSA teleworkers have not taken the required training.**

Hundreds of GSA employees and supervisors had not taken two telework training courses required by GSA. Accordingly, these employees do not comply with GSA policy and may be unaware of important telework definitions and policies. Further, GSA has not updated telework training to reflect important telework policy changes.

In 2011, GSA developed two GSA Online University training courses for teleworkers. One course, titled "Telework Works," is required for GSA employees who telework. The second course, titled "Managing Distributed Teams," is required for all GSA supervisors. GSA's Mobility and Telework Policy and the telework agreement require completion of the training prior to beginning telework.

As of June 24, 2013, 11,811 GSA employees had taken "Telework Works" but 614 had not. Over half of those who had not completed the course teleworked during June 2013. In addition, while 1,732 GSA supervisors had taken "Managing Distributed Teams," 285 supervisors had not.

Further, we noted that GSA has not updated these courses to reflect requirements of CPO IL-12-04 or changes to the Electronic Time and Attendance Management System telework codes. For example, the CPO IL-12-04 requirement for preparation and approval of GSA Form 3703 was not discussed in the training, and after the training was developed, telework codes 91 and 92 were redefined and codes 90 and 93 were added.

### **Recommendations**

We recommend that the Chief Human Capital Officer:

1. Implement controls to ensure compliance with GSA CPO IL-12-04; specifically:

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<sup>8</sup> In addition, Department of Transportation data for June 2013 showed that 13 teleworkers received transit subsidies over their approved amounts.

- a. Ensure all virtual employees have properly approved arrangements.
  - b. Ensure all virtual arrangements are reviewed annually by appropriate levels of management. The review should include comparison of actual to estimated travel costs and evaluation of whether current travel policies and budgets can adequately support the virtual arrangement.
  - c. Establish controls to maintain an accurate list of virtual employees.
2. Verify official duty stations for all virtual employees and correct any errors, including collection of amounts owed or payment of amounts due.
  3. Enhance controls over timekeeping; specifically:
    - a. Ensure that GSA employees and timekeepers correctly record telework time.
    - b. Consider establishing a separate time and attendance code for virtual employees.
  4. Enhance controls over transit subsidies; specifically:
    - a. Review approved transit subsidy recipients to ensure that virtual employees are not receiving transit benefits and collect any overpayments from the employees.
    - b. Remind GSA employees that regularly scheduled telework days are to be deducted when computing requested subsidy amounts and that they are to notify their regional telework coordinator if their telework status changes.
  5. Ensure that GSA employees complete required telework training in accordance with GSA policy prior to beginning or continuing to telework. Employees failing to complete all required telework training within a reasonable time period should be removed from telework.
  6. Incorporate the requirements of CPO IL-12-04 into required telework training courses.

## **Management Comments**

The Chief Human Capital Officer concurred with our recommendations. Management's written comments to the draft report are included in their entirety as **Appendix B**.

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## ***Conclusion***

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GSA has developed telework policies and controls as required by law. However, GSA has not followed some of its own telework procedures and should strengthen its controls to ensure that all telework complies with applicable policies and procedures. Specifically, we identified improvement opportunities over controls for virtual employees in the areas of approvals, duty station accuracy, and timekeeping. We also identified opportunities for improving controls over transit subsidies and training for all GSA teleworkers.

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## ***Appendix A – Purpose, Scope, and Methodology***

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### **Purpose**

This audit was included in the Office of Inspector General's Annual Audit Plan for FY 2013.

### **Scope and Methodology**

Our scope included evaluating controls related to GSA teleworkers during FYs 2012 and 2013, with an emphasis on virtual employees. We reviewed the Agency's controls over the approval of virtual work, travel related to virtual work, duty station accuracy, and the proper recording of telework time. Our scope also included controls over transit subsidies and training for teleworkers.

To accomplish our objective, we:

- Reviewed relevant laws, regulations, policy, and guidance and reports issued by other government agencies;
- Researched telework through various online websites;
- Interviewed cognizant GSA officials, including those responsible for telework in the Office of Human Resources Management and the Office of the Chief Financial Officer;
- Contacted 122 GSA employees to determine whether they were virtual;
- Performed automated analyses of data related to about 40,000 travel vouchers filed by GSA associates in FYs 2012 and 2013. The data resided in CW Government Travel's E2 Solutions travel system;
- Analyzed June 2013 transit subsidies for GSA employees based on data in GSA's Electronic Time and Attendance Management System and the Department of Transportation's reports related to transit subsidies for GSA employees;
- Gained an understanding of controls related to transit subsidies from GSA officials and GSA websites and by reviewing agreements between GSA and the Department of Transportation;
- Analyzed GSA's June 2013 reports related to telework training, such as comparing the data to GSA employees who charged time to telework in GSA's Electronic Time and Attendance Management System;
- Reviewed GSA's efforts to publicize and track the requirement for telework training;
- Analyzed GSA reports on virtual teleworkers, along with guidance for virtual telework, such as CPO IL-12-04;
- Evaluated duty station accuracy by reviewing data in GSA's Payroll Accounting and Reporting system and contacting a judgmental sample of GSA employees;

- Computed the impact of duty station errors on locality pay for 2013; and
- Evaluated the accuracy of time recorded in GSA's Electronic Time and Attendance Management System from August 2012 to July 2013 for virtual employees.

We conducted the audit between April 2013 and January 2014 in accordance with generally accepted government auditing standards. 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.

### **Internal Controls**

Our review of internal controls was limited to those necessary to address the specific objectives and scope of the audit. Thus, our assessment and evaluation of internal controls are structured to those issues identified in the results section of this report.

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## Appendix B – Management Comments

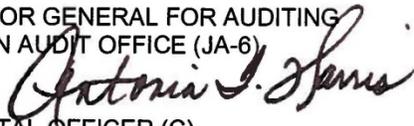
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GSA Office of the Chief Human Capital Officer

JAN 02 2015

MEMORANDUM FOR JOHN F. WALSH  
REGIONAL INSPECTOR GENERAL FOR AUDITING  
HEARTLAND REGION AUDIT OFFICE (JA-6)

FROM: ANTONIA T. HARRIS   
CHIEF HUMAN CAPITAL OFFICER (C)

SUBJECT: GSA's Program for Managing Virtual Employees and  
Teleworkers Needs Improvements  
*Report Number A130019*

The Office of Human Resources Management (OHRM) appreciates the opportunity to review and comment on the draft report entitled *GSA's Program for Managing Virtual Employees and Teleworkers Needs Improvements*, Report Number A130019, dated December 4, 2014.

OHRM does not dispute the findings and accepts the recommendations stated in the report. In advance of this audit, OHRM had undertaken several actions to improve overall implementation of, and to strengthen internal controls associated with, telework, full time telework and satellite work arrangements. They included:

- Annual review requirement of all virtual arrangements to ensure budget and performance compliance with the agreement
- Review agency Mobility and Telework policy, request input from agency stakeholders, and initiate planning for policy update
- Initiation of review and verification of official duty stations and locality pay for full time teleworkers
- Update and enhance communication efforts in regard to capture of telework participation through ETAMS, and
- Incorporate instructions to "back out" telework days from calculation of transit subsidy benefit on application form.

The actions outlined below are underway and planned to respond to the recommendations included in the draft report.

**IG Recommendation 1** - Implement controls to ensure compliance with GSA Chief People Officer (CPO) Instructional Letter (IL) 12-04; specifically:

- a. Ensure all virtual employees have properly approved arrangements.



- b. Ensure all virtual arrangements are reviewed annually by appropriate levels of management. The review should include comparison of actual to estimated travel costs and evaluation of whether current travel policies and budgets can adequately support the virtual arrangement.
- c. Establish controls to maintain an accurate list of virtual employees.

**OHRM's Response**

Actions in-progress

- Updated GSA Mobility and Telework policy. Draft policy update is currently being vetted by Services and Staff Offices prior to signature. Changes include:
  - o Require new employees to complete training and telework agreement within 60 days
  - o Require annual telework agreement review and approval
  - o Clarify requirement to telework in response to emergency situations
  - o Require annual training
  - o Clarify supervisory responsibility to review and approve agreements
  - o Reinforce requirement to enter telework in ETAMS, and
  - o Reinforce employee responsibilities in regard to GSA Transit Subsidy Program.

Actions planned

- Update CPO IL-12-04 to more closely fit agency needs when agency telework policy update is finalized. Focus of that update will include:
  - o Improve submission, evaluation, and approval process
  - o Enhance review and GSA value/cost assessment process
  - o Enhance internal controls, and
  - o Improve reporting capabilities.

**IG Recommendation 2** - Verify official duty stations for all virtual employees and correct any errors, including collection of amounts owed or payment of amounts due.

**OHRM's Response**

Actions completed

- Verified and corrected as appropriate locality pay for full time telework and satellite workers.

Actions in-progress

- Partnering with the Office of the Chief Information Officer to build additional capability in the future state Human Resources Information Technology (HRIT) solution for better internal controls and reporting. New HRIT solution is scheduled for implementation in fiscal year 2017.

**IG Recommendation 3** - Enhance controls over timekeeping; specifically:

- a. Ensure that GSA employees and timekeepers correctly record telework time.
- b. Consider establishing a separate time and attendance code for virtual employees.



**OHRM's Response**

Actions completed

- OHRM has updated and enhanced communication to support recording of telework.

Actions planned

- Partner with the Office of the Chief Financial Officer to explore the development of payroll codes for full time telework to better track and verify time reporting accuracy. Assessment to be completed by second quarter fiscal year 2015.
- Update telework training highlighting full time telework/satellite agreements.

**IG Recommendation 4 - Enhance controls over transit subsidies, specifically:**

- a. Review approved transit subsidy recipients to ensure that virtual employees are not receiving transit benefits and collect any overpayments from the employees.
- b. Remind GSA employees that regularly scheduled telework days are to be deducted when computing requested subsidy amounts and that they are to notify their regional telework coordinator if their telework status changes.

**OHRM's Response**

Actions in-progress

- Exploring movement to automated Department of Transportation transit subsidy application and administration system to save money, reduce GSA resources supporting the program, and improve internal controls and reporting. Assessment to be completed by second quarter fiscal year 2015.

**IG Recommendation 5 - Ensure that GSA employees complete required telework training in accordance with GSA policy prior to beginning or continuing to telework. Employees failing to complete all required telework training within a reasonable time period should be removed from telework.**

**OHRM's Response**

Actions completed

- Conducted an agency review to ensure compliance with GSA Mobility and Telework policy requirements for training completion and telework agreement approvals for all employees. Review resulted in approximately 90 percent completion for telework agreements and approximately 96 percent completion for training.
- Developed reports for tracking telework participation and training completion.
- Updated draft policy to require annual training, as well as annual review and approval of telework and full time telework agreements.
- Updated draft policy requiring new hires complete telework training and have a telework agreement in place within 90 days of onboarding.

**IG Recommendation 6 – Incorporate the requirements of CPO IL-12-04 into required telework training course.**



GSA Office of the Chief Human Capital Officer

**OHRM's Response**

**Actions planned**

- Issue updated telework training by third quarter fiscal year 2015.

Again, thank you for the opportunity to respond. If you have any questions, please contact me or Kimberly Lewis, Director, Office of Human Resources Strategy and Services at [kimberly.lewis@gsa.gov](mailto:kimberly.lewis@gsa.gov) or 202-501-0651.

cc: GAO/IG Audit Response Branch (HIC)

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## ***Appendix C – Report Distribution***

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Chief Human Capital Officer (C)

Audit Liaison, Office of the Chief Human Capital Officer (CD)

Branch Chief, GAO/IG Audit Response Division (H1C)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Investigations (JID)

Director, Audit Planning, Policy, and Operations Staff (JAO)