



Federal Election Commission
Office of Inspector General

Final Report
Audit of the FEC's Telework Programs
June 2016
Assignment No. OIG-15-03

Office of Inspector General's Audit of The FEC's Telework Programs

Highlights

The overall objective for this Office of Inspector General (OIG) audit was to review and assess the Federal Election Commission's (FEC) telework programs to ensure they were being administered in accordance with applicable Federal law, regulations, and Office of Personnel Management (OPM) guidance, and to determine if the telework programs have been implemented within the spirit of the Federal telework guidance. The FEC has two telework programs: one for Bargaining Unit (BU) employees and one for Non Bargaining Unit (NBU) employees.

Noteworthy Accomplishments

- The FEC's telework programs and policies generally follow OPM guidance;
- As of July 2015, the FEC has expanded both telework programs to allow a maximum of four days of regular scheduled telework per pay period (for non-managers); and
- During the audit, a Telework Managing Officer was designated to have oversight of the Telework programs.

OIG Concerns

- Telework has not been implemented equitably
 - Management's interpretation and implementation of episodic telework is not aligned with the definition of "situational" telework according to the OPM Guide to Telework in the Federal Government. As a result, some employees' use of episodic telework equated to normal scheduled telework;
 - There is no formal policy to address how the FEC will handle situations related to employees who request or need special telework arrangements with the exception of employees who request and are approved for reasonable accommodations;
- Oversight, monitoring, and assessment of the telework programs are not adequate;
- Telework hours have not been accurately recorded in the time and attendance system; and
- Recordkeeping is inadequate to ensure compliance with telework policies and procedures.

OIG Audit of the FEC's Telework Programs

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Executive Summary

The OIG conducted the Audit of the FEC's Telework Programs based on the results of the OIG's annual risk assessment process and several concerns received from FEC staff members surrounding the FEC's telework practices. The primary objectives of the audit were to determine whether the agency's telework programs were being administered by the agency in accordance with related Federal law, regulations, guidance, and FEC policies and procedures; and to assess whether the telework programs have been implemented within the spirit of Federal telework guidance.

Overall, the OIG concludes that the FEC's telework programs and written policies have been designed to incorporate many of the **Key Telework Practices for Implementation of Successful Federal Telework Programs**.¹ During the period under review, the Telework Coordinator, a member of the Office of Human Resources (OHR), was responsible for the day-to-day management of the telework programs. However, there was no designated Telework Managing Officer (TMO)² at the time.

A significant finding concerns the approval of telework, especially episodic telework, in a less than equitable manner. Nearly one-third of telework survey respondents did not believe the programs were implemented equitably. One cause is that the interpretation and implementation of episodic telework by some supervisors and managers is not in accord with OPM's telework guidance, which states:

An employee can be approved for telework under the second type described above, i.e., situational, episodic, or ad-hoc as the need arises.... Examples include but are not limited to the following: 1) an employee has a short-term need for uninterrupted time to complete work on a complex project or report; 2) an employee is recovering from illness or an injury and is temporarily unable to physically report to the traditional office....

For example, some employees were allowed to telework on an episodic basis on a specific day or days of the week on such a frequent basis that it equated to regular scheduled telework. In other instances, employees were allowed to telework using a combination of regular scheduled telework and episodic so frequently that it circumvented both the BU and NBU policies concerning the maximum number of days that employees were allowed for regular telework. Not applying a standard basis for deciding whether to approve an employee's request for episodic telework increases the risk and the perception that telework is not equitably granted, and could be a contributing factor to the low employee morale at the FEC.

¹ Adopted by the OPM as a reference in the Reports and Studies section on its www.telework.gov website, the practices were developed by the Government Accountability Office for its report, "Key Practices to Increasing Federal Telework" (June 2004).

² Subsequent to the completion of fieldwork, the Acting Deputy Staff Director for Management was designated as the TMO.

Other findings and process improvement opportunities to ensure the telework programs are operating effectively include:

- Oversight and monitoring controls are not adequate;
- There was no formal policy to address how the FEC will handle those circumstances related to employees who request or need special telework arrangements with the exception of employees who request and are approved for reasonable accommodations;
- Telework pay categories and hours are not accurately recorded in the time and attendance payroll system;
- Some supervisors and employees are not consistently complying with internal telework policies and procedures, especially related to recordkeeping; and
- Existing WebTA telework reporting capabilities are not utilized to monitor and assess compliance with telework policies and procedures.

In order to ensure internal controls are achieving the desired results, periodic assessments are necessary. In fact, OMB Circular A-123 states ... *Agency managers should continuously monitor and improve the effectiveness of internal control associated with their programs.*

The detailed findings along with 11 recommendations to help management strengthen the effectiveness and oversight of the telework programs are included in the **Audit Findings and Recommendations** section beginning on page 5. Management generally agreed with all recommendations.

Audit Findings & Recommendations

I. Telework Has Not Been Implemented Equitably

Most FEC employees (91%) are eligible for telework, at least on an episodic basis, according to the OHR. However, based on a sample of 44 employees, some employees were granted an excessive amount of telework, while other employees were held to the policy limit of no more than two scheduled telework days per pay period. For example, some employees were allowed to work episodic telework, or a combination of regular scheduled and episodic telework, on such a consistent basis that over time it equated to normal scheduled telework in excess of the 2 days per pay period allowed by the telework policies then in place.

Some employees were allowed to telework more days per pay period than the policy limit.

A. Based on the sample of 44 employees selected for testing during the period under review (March 2014 to March 2015), OIG identified seven employees that were granted improper episodic telework. For example:

- An employee was teleworking full time, using a combination of scheduled and episodic telework, from an alternate duty station (ADS) located in another state for approximately seven months;
- An employee had a separate approved episodic telework agreement that allowed the employee to telework episodically on one specific day per pay period, in addition to the two regular scheduled telework days per pay period. This technically gave the employee 3 telework days per pay period; and
- Five other employees used either episodic telework or a combination of regular and episodic telework on multiple occasions that resulted in a total of four to five telework days per pay period. There were no indications that these instances were related to specific project needs.

The OIG concludes that the use of episodic telework at the FEC was not implemented in compliance with the intent of episodic which is synonymous with “situational or ad-hoc” telework as defined by OPM Federal telework guidelines. Also, the use of episodic telework is not consistent with the definition included in the FEC’s telework policies as follows:

- a. The definition of episodic telework according to the FEC Telework Policy for NBU employees states:
 - i. *Working at an ADS on a case-by-case basis for specific projects or assignments, where the hours worked are not part of a previously approved ongoing and regular telework schedule.*

- b. The FEC Labor Management Agreement (LMA) Article 23 Section 1 (which serves as the BU telework policy) states:
 - i. *Episodic Telework in which employees are permitted to telework on a temporary basis either for medical or work-related reasons.*

Furthermore, NBU Policy Section V.C.9 states: *Managers and supervisors shall approve or deny telework applications and assignments in a fair, equitable and objective manner.*

Recommendations

- 1. Managers should ensure that episodic telework is only used for its intended purpose, which is defined in the OPM Federal telework guidance and the FEC telework policies as “sporadic, or for a short period of time.”

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG’s concerns, by updating policies that deal with episodic telework and accurate recording of time in WebTA. The Corrective Action Plan (CAP) presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

- 2. The TMO or designee should periodically monitor telework activity to ensure episodic telework is being used properly, and to identify excessive use of episodic telework. The OIG suggests that WebTA telework reports could be generated to assist in this process.

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG’s concerns, by updating policies that deal with episodic telework and accurate recording of time in WebTA. The CAP presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective action once fully implemented by management to ensure that it fully addresses this recommendation.

- B. The FEC does not have a written policy or document that specifically addresses how special telework arrangements/requests should be handled, evaluated and approved, nor do the current policies indicate that all employees have the ability to request telework arrangements that fall outside of the normal policy guidelines.

The lack of formal policies to address these practices increases the risk and the perception that managers are implementing telework in an inequitable manner. For example, as mentioned above, one employee was allowed to telework full time from an ADS in another state. Without a policy that includes the circumstances under which an employee can request such an arrangement, the perception of favoritism could be concluded.

No written policy exists to address special telework arrangements with employees.

There was no prior evidence of a specific telework agreement or written documentation that included the terms and conditions of the employee's participation in this special telework arrangement, such as the duration of the ADS or who approved it.

Recommendations

3. FEC telework policies should state whether employees can request and/or be granted special telework arrangements (any arrangement outside the normal policy), as well as list the criteria that will be used for determining whether or not an employee can be approved for a special telework arrangement. If special telework arrangements are to be allowed, even if on a temporary basis, they should be documented in writing separate from the standard telework application and should include the anticipated timeframe of the special arrangement. Consideration should be given to have all special telework arrangements approved by the Staff Director, General Counsel, or Chief Financial Officer, as appropriate, along with notification to the TMO.

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG's concerns, by updating policies and the CAP presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective action once fully implemented by management to ensure that it fully addresses this recommendation.

II. Oversight, Monitoring, and Assessment of Telework Programs Are Not Adequate

Based on the results of the OIG's detailed testing, overall assessment of the FEC's telework program, and review of telework data compiled for reporting to OPM, internal controls to ensure proper oversight, monitoring, assessment, and reporting of the telework programs are not adequate. For example:

Telework programs are not monitored for effectiveness and compliance.

- There is no standard monitoring process to oversee the telework programs. The OIG review of the WebTA reports related to telework reveal that some employees may be teleworking more than the applicable policy allowed. However, these reports are only generated when the agency receives a data call from OPM and not used internally to monitor the telework programs for potential noncompliance or to ensure the telework programs are being implemented equitably across the entire agency;
- The FEC still has not implemented performance evaluation tools or processes contained in the Telework Assessment Process addendum to the NBU telework policy to determine employee satisfaction with telework, transit subsidy rate decreases due to telework, and overall effectiveness of the telework programs; and

- Minor discrepancies were identified with data reported to OPM during the 2013 data call.
 - The total number of employees that teleworked on a routine (regular scheduled telework) reported was 100 but the number the OIG verified to source data (WebTA reports) is 92;
 - The total number of employees who teleworked 3 or more days a pay period was reported as 97, but the number the OIG verified to WebTA reports was 109.

According to the FEC's Telework Assessment Process included in the NBU Telework Policy, and OPM Federal telework guidance, the FEC was supposed to develop tools and processes to perform an assessment of the progress the agency has made in meeting agency participation rate goals and other agency goals related to telework, such as the impact of telework on emergency readiness, Transit subsidy rate decreases, energy use, recruitment and retention, performance, productivity, and employee attitudes and opinions regarding telework.

The FEC's Telework Policy for NBU employees states the TMO shall:

Develop goals and metrics in order to evaluate the telework program

A provision of the Telework Enhancement Act of 2010, codified in 5 U.S.C. § 6505, requires a TMO to be designated by the FEC. Although there was a Telework Coordinator (an OHR staff member) assigned responsibility for the day to day management of the telework programs, during the time period under review, there was no senior level person designated as the TMO who was responsible for ensuring the telework programs were operating effectively. Subsequent to the start of audit fieldwork, the OIG was made aware that the FEC has appointed a designated TMO. However, FEC Management has not implemented the necessary tools or processes to effectively evaluate the telework programs.

During the period under review, the agency did not have a designated TMO.

Not having adequate controls and processes in place to monitor and evaluate the telework programs increases the risk of noncompliance to the telework policies and Federal telework laws/guidance.

Recommendations

4. The TMO or designee should perform monitoring of the telework programs at least annually. The WebTA telework activity reports could be generated and reviewed to perform monitoring and evaluation of the telework programs. Currently these reports are generated to respond to occasional OPM telework data calls. For example, some of the reports list the names of the employees who telework more days than the policies allow and break it down by the actual number of days teleworked. A sample of employees who appear to telework more days than are allowed per policy could be followed up on to determine if the data is accurate, proper documentation exists, explanations are reasonable, and/or telework activity is not in compliance with applicable policies.

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG's concerns, by

updating policies that deal with episodic telework and accurate recording of time in WebTA. The CAP presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

5. The TMO or designee should implement tools and processes to evaluate the effectiveness of the FEC's telework programs.³

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG's concerns and the CAP presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

III. Telework Hours Have Not Been Accurately Recorded in Time and Attendance (T&A) System

Based on the results of OIG's detailed testing and follow-up with employees and supervisors related to telework hours recorded in the T&A system, we identified the following:

- Telework hours were recorded for days employees were in the office (for two employees sampled). The employees validated the incorrect hours and the supervisors certified (approved) the time cards; and
- Employees used the wrong telework pay category and the T&A records were certified by their supervisor (for nine employees sampled). For example:
 - the scheduled telework category was used for episodic-project related telework;
 - the unscheduled/emergency telework category was used for episodic-project related telework; and
 - the episodic- medical telework category was used instead of episodic-project.

Based on discussions with employees and supervisors, it appears that there is confusion and no consensus as to when to use certain episodic telework pay categories (see description of all telework categories in the **Background** section page 14). For example:

- The episodic-medical pay category in WebTA is the pay code that should only be used when an employee has an approved medical telework application. However, some employees think that the episodic-medical pay category can be used when the employee is going to telework on a day the employee has a doctor's appointment. If an employee

³ While we are not making a recommendation, we suggest that the TMO or designee ensure the data included in future OPM telework data call reports are reviewed for accuracy.

simply has a medical appointment, the use of the regular episodic telework category is appropriate. As a result, based on review of the T&A records, it appears that some employees are teleworking without an approved medical telework agreement; and

- Two FEC staff members were allowed to use the regular scheduled telework pay as opposed to the episodic-project pay category whenever they were approved to telework for tasks that required them to be on duty for 24 hours or overnight. As a result, in a review of the T & A system, it appears that these employees were allowed to work regular scheduled telework in excess of the policy limits.

The Telework Policy for NBU employees, Section VI.B.7.a states:

Proper monitoring and certification of employee work time is critical to the success of the telework program.

The LMA Article 23 Section 5:A.20 states:

Employees working under a telework program arrangement must adhere to established rules, practices, procedures (including the Labor Management Agreement), and regulations governing time, attendance...

The OIG notes that the T&A system design could be contributing to the T&A recording errors. When a change in the regular work schedule (default schedule) occurs, the employee must manually make the change in WebTA. During the next pay period, the default schedule must be reset by the employee. WebTA does not automatically reset an employee's default schedule after a change. However, it is the employee's responsibility to ensure that all hours recorded in the T&A system agree to the type of and actual hours worked prior to validating timesheets. The fact that these errors went undetected by the supervisors during the certification process indicates the need for periodic reminders and training concerning their responsibilities in ensuring accurate reporting of their employees' time.

Failure to properly record telework in the T&A system would have an adverse effect on assessments of the telework programs, decreases management's ability to use telework data as a management tool, and increases the risk that telework data reported externally by the agency is not a true representation of the telework programs.

Recommendations

6. The TMO should reinforce the importance of ensuring telework hours are accurately recorded in WebTA before validating time sheets.

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG's concerns, by updating policies that deal with accurate recording of time in WebTA.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

7. Supervisors and managers should ensure telework hours are accurately recorded in WebTA before certifying time sheets.

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG's concerns by updating policies that deal with accurate recording of time in WebTA.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

8. Management should ensure telework policies and training materials give clear explanations as to when each type of telework pay category should be used. Also, the TMO should hold refresher training.

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG's concerns, by updating policies that deal with episodic telework and accurate recording of time in WebTA. The CAP presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

IV. **Recordkeeping Is Inadequate to Ensure Compliance with Telework Policies and Procedures**

Based on the sample of 44 employees selected for testing during the period under review (March 2014 to March 2015), OIG identified the following non-compliance issues:

- Of the employees sampled, 34% did not have an approved telework agreement in the central file maintained by the Telework Coordinator. Of those, OIG was able to obtain some agreements from the employee or supervisor, but there were some employees that did not have a telework agreement on file and could not produce one. Therefore, OIG was not able to verify that all sampled employees had telework agreements in place;
- Nine of the sampled employees lacked documentation to support episodic telework activity and/or demonstrate that special telework arrangements were approved in advance; and
- Three of the four employees who recorded time to the episodic- medical telework pay category did not have an approved medical telework application or a reasonable accommodation plan in place.

Some employees /supervisors are not maintaining adequate records to ensure compliance with Telework policies.

According to telework policies:

- Employees are required to complete a telework application and forward the approved telework application to the telework mail box. The Telework Coordinator is responsible for maintaining a central file for all applications;
- Employees must obtain advance approval in writing every time they want to use episodic telework. NBU employees can request and obtain approval via email. BU employees must complete and submit a separate episodic telework request form (Episodic Form 2) for each proposed episodic assignment; and
- Employees must obtain advance approval in writing for medical telework. Normally, a telework application with the medical telework option selected is completed and signed by the appropriate supervisor/manager. For BU employees, the Staff Director or, in the case of employees in the Office of the General Counsel, the General Counsel must approve.

FEC staff and supervisors did not consistently comply with the telework policies and procedures as mentioned above. Also, according to one manager interviewed, there was a change in the standard practice for requesting and approving episodic telework for BU employees which eliminated or suspended the need for BU employees to complete the Episodic Form 2 for each episodic telework request, but this change was not documented in BU Policy. Maintaining sufficient documentation is necessary to ensure telework programs are operating effectively and that telework activity is in compliance with current policies and procedures.

Recommendations

9. The TMO or designee should reinforce telework policies and procedures to supervisors and staff annually (and as needed based on results of monitored activity).

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG's concerns and the CAP presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

10. The TMO or designee should implement a control procedure to ensure all employees that are participating in the telework program have an approved telework application on file.

Management Response: Management generally concurs with the recommendation. Management has unilaterally taken action to correct some of the OIG's concerns and The CAP presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

11. The TMO or designee should periodically (at least annually) assess the telework programs and determine if policies and procedures need to be updated to reflect changes in standard practices and/or update for other reasons.

Management Response: Management generally concurs with recommendation. Management has unilaterally taken action to correct some of the OIG's concerns and The CAP presents a plan to address the other OIG concerns.

OIG Comment: The OIG looks forward to reviewing corrective actions once fully implemented by management to ensure that it fully addresses this recommendation.

Background

The FEC initially introduced the concept of telework in 2005 by providing FEC BU employees with the opportunity to telework by way of a Memorandum of Understanding (which was amended in 2008). The program was expanded in 2007 to include NBU employees and instituted the “Flexiplace” pilot program, which has since been developed into the BU Telework Program and the Telework Program for FEC NBU employees, to comply with *Public Law 106-346 §359, Department of Transportation and Related Agencies Appropriations Act, 2001* (the Appropriations Act). The Appropriations Act established a legislative mandate to allow eligible Federal employees the opportunity to telework. It also requires each executive agency to establish a policy under which eligible employees of the agency may participate in telework to the maximum extent possible without diminished employee performance.

On December 9, 2010, Congress passed the Telework Enhancement Act of 2010 (The Telework Enhancement Act). According to the Telework Enhancement Act, *the term 'telework' or 'teleworking' refers to a work flexibility arrangement under which an employee performs the duties and responsibilities of such employee's position, and other authorized activities, from an approved worksite other than the location from which the employee would otherwise work.* The Telework Enhancement Act establishes additional requirements for Federal telework programs, and many of the OPM key practices became legislatively mandated following its passage including the requirement for each agency to designate a senior official as the TMO. In addition OPM, in collaboration with each agency, is required to compile and submit an annual report on the telework programs of each agency.

Some of the key telework practices include but are not limited to:

- Designating a TMO;
- Notifying all employees of the agency of their eligibility to telework;
- Requiring all teleworkers to have a written agreement;
- Ensuring that an interactive telework training program is in place for all eligible employees, managers, and teleworkers;
- Submitting data to OPM reporting on the degree of telework participation; and
- Setting and reporting on telework related goals.

Pursuant to the Telework Enhancement Act, the FEC fully implemented two telework programs to replace the Flexiplace Pilot Program and a member of the OHR was designated as the Telework Coordinator with responsibility for implementing and managing the telework programs. However, during the period under review, no senior level person at the FEC was designated as the TMO which is a requirement of the Telework Enhancement Act. The FEC created two telework policies:

- One for NBU employees via the Telework Policy for Non-Bargaining Unit Employees which was approved by the Commission on July 14, 2011; and

- One for the BU employees pursuant to Article 23 of the 2013 edition of the Labor Management Agreement between the FEC and the National Treasury Employees Union (which represents the FEC's BU), which serves as the BU telework policy.

The FEC telework programs include two categories of telework:

1. Regular (Scheduled) Telework - which, during the time period covered by the review, permitted employees to work at an Alternative Duty Station (ADS) for one or two days during the same week up to a maximum of two days per pay period according to a set schedule;
2. Episodic Telework - which permits employees to telework at an ADS on a case by case basis, as determined by the supervisor, where the hours are not part of a previously approved scheduled telework agreement. There are several types of episodic telework which include:
 - Episodic Project – telework for a specific project or assignment on a temporary basis;
 - Episodic Medical – telework while recuperating from a short-term illness or medical condition on a temporary basis;
 - Unscheduled/Emergency Telework – telework which occurs when OPM announces that the Federal Government is “Open with Option for Unscheduled Leave or Unscheduled Telework.”

According to the telework policies in place during the audit period, eligible employees had the opportunity to work episodically in addition to their normal scheduled telework days. All telework eligible employees had to request approval to telework by completing and signing a telework program application (which also served as the telework agreement). The employee had to indicate on the telework application what type(s) of telework they were requesting, as well as which day(s) of the week. Before the employee could actually begin teleworking, the supervisor had to approve/sign the telework agreement, and the employee must complete the on-line telework training, and the Self-Certification Safety Check list. Eligible employees were also required to request advance approval when they wanted to telework episodically.

There were several differences between the NBU and BU telework programs during the review period. One was that BU employees could work both scheduled telework days in the same week, while NBU employees could only use scheduled telework one day per week. Also, BU employees had to complete a separate form (Episodic Form 2) every time they wanted to telework episodically whereas NBU employees could request advance approval via email. Last, NBU employees were required to recertify annually and could request adjustments to their telework schedule during this time. BU employees had open enrollment twice a year at which time they could request changes to their telework scheduled and/or recertify.

OBJECTIVES, SCOPE AND METHODOLOGY

Objectives

The primary objective of the audit was to determine whether the agency's telework programs were being administered in accordance with Federal telework law and regulations, OPM telework guidance, and FEC policies and procedures. The audit also focused on whether the telework programs were implemented within the spirit of Federal guidance.

Scope

The scope of the audit included the review of FEC's telework policies in place as of March 2015 and the status of all FEC employees' telework eligibility as of February 2015. The audit period used for detailed audit testing of actual employee telework activity was a twelve month payroll cycle from March 2014 to March 2015.

Methodology

The OIG conducted this performance audit 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. In order to meet our audit objectives, we used interviews, inquiries, review of supporting documentation, and judgmental sampling for items selected for detailed testing.

The OIG conducted the following audit steps:

Audit Planning

- Reviewed the FEC's policies and procedures related to the telework programs;
- Researched laws, regulations, and guidance related to Federal telework requirements; and
- Interviewed the Telework Coordinator to gain a better understating of the FEC's telework programs, including processes and procedures for granting and monitoring employee telework activity.

OIG FEC Telework Survey

- Developed an OIG survey related to the FEC's telework programs and provided the survey to all FEC staff to determine if staff is satisfied with the telework programs;
- Evaluated the results of the survey to identify any potential issues or improvements needed; and
- Used survey results to determine any areas to focus detailed audit testing.

Detailed Audit Testing

- Obtained and reviewed staffing reports modified by OHR that list telework eligibility for each position/staff member and performed the following:
 - Determined reasonableness of positions/employees listed as not eligible to telework; and
 - Identified employees not eligible for telework that are in similar positions of those who are eligible to telework, and then followed up with employees and/or supervisors to determine the reason why; and
- Selected a judgmental sample of 44 employees (to ensure a reasonable representation of the total population of BU and NBU employees from different divisions/offices) listed as eligible, as determined by OHR, to telework from the OHR-modified staffing report that were actually teleworking. Obtained a report generated from FEC's T&A system (WebTA) which included actual time recorded to all telework related pay categories for a 12 month pay cycle from March 2014 to March 2015. The detailed testing included the following:
 - Ensured required telework documentation was properly completed and approved prior to an employee starting telework;
 - Determined if employees' actual telework as recorded in WebTA was consistent and in line with telework agreements, as well as in compliance with the applicable telework policies;
 - Determined if employees had episodic telework approved in advance;
 - Followed-up with employees/supervisors on potential excessive episodic telework and/or regular scheduled telework beyond policy limits;
 - Determined if supporting documentation and/or explanations were reasonable or constituted noncompliance; and
 - Assessed the overall reasonableness of actual telework and whether telework had been implemented equitably.
- Obtained and reviewed the latest telework data reported to OPM and performed the following:
 - Traced and agreed telework data reported to OPM to source documents (reports generated from the WebTA system) for accuracy and completeness; and
 - Reviewed WebTA reports for indications of potential compliance issues.

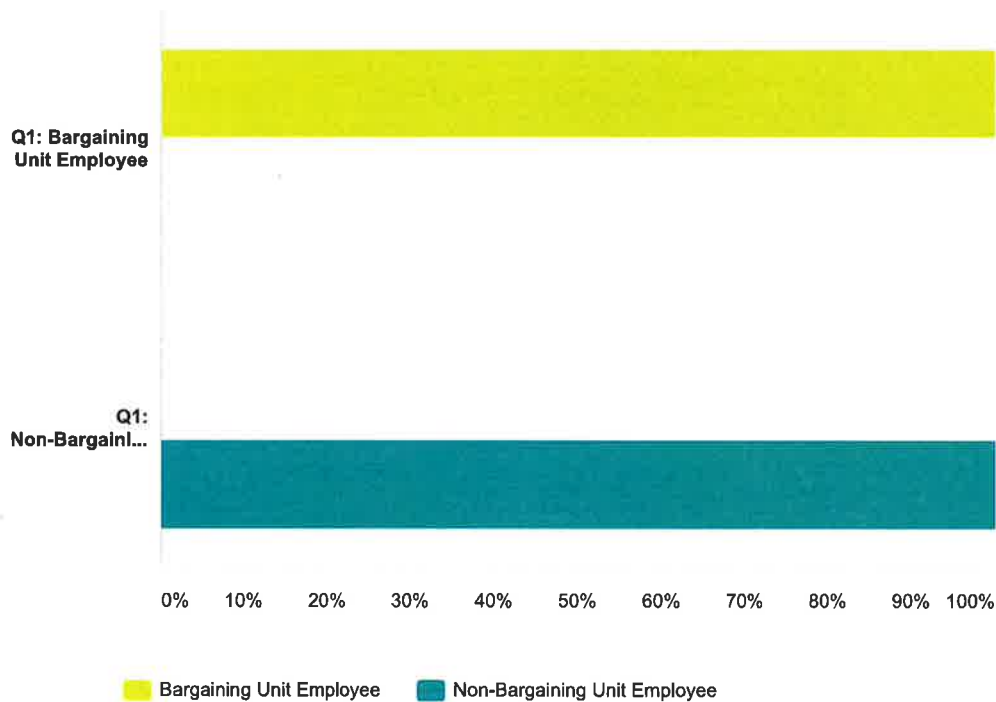
OIG Telework Survey

The OIG conducted an anonymous employee telework program survey in April 2015 to receive feedback from FEC staff on the effectiveness of the programs.

Out of approximately 314 FEC employees surveyed, the OIG received 126 responses to the survey, a response rate of 40%. Of the 126 respondents, 110 (87%) stated that they participate in at least one type of telework. We have redacted portions of some comments as we felt they may provide identification of specific employees. See **Appendix A** for the OIG survey results.

Q1 Are you a:

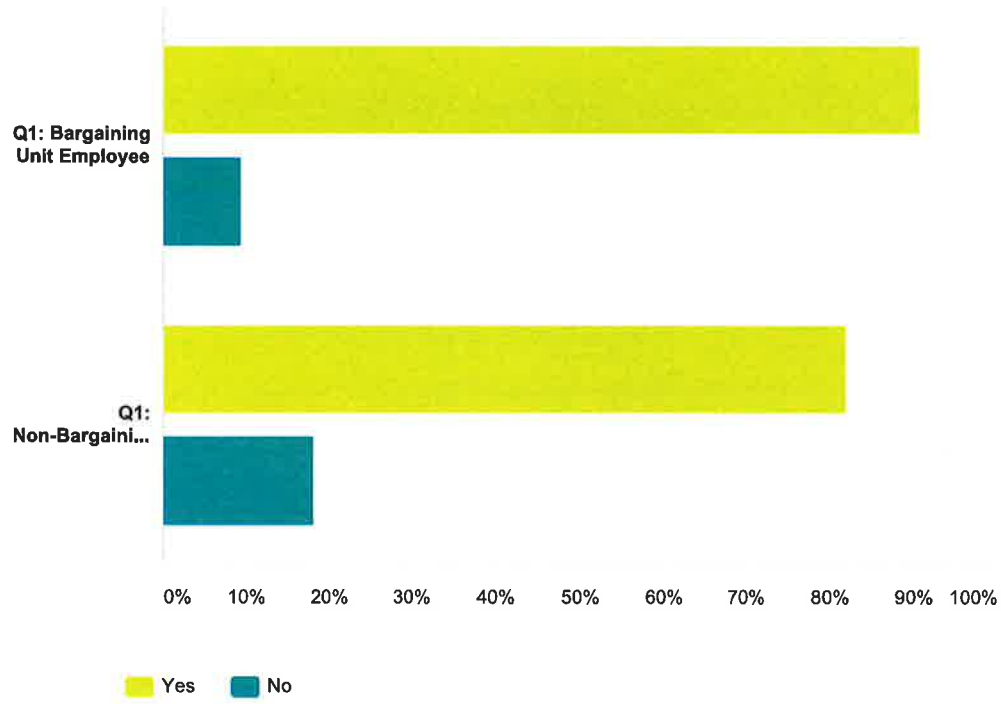
Answered: 126 Skipped: 0



	Bargaining Unit Employee	Non-Bargaining Unit Employee	Total
Q1: Bargaining Unit Employee (A)	100.00% 76	0.00% 0	60.32% 76
Q1: Non-Bargaining Unit Employee (B)	0.00% 0	100.00% 50	39.68% 50
Total Respondents	76	50	126

**Q2 Do you participate in at least one of
FEC's Flexiplace programs?**

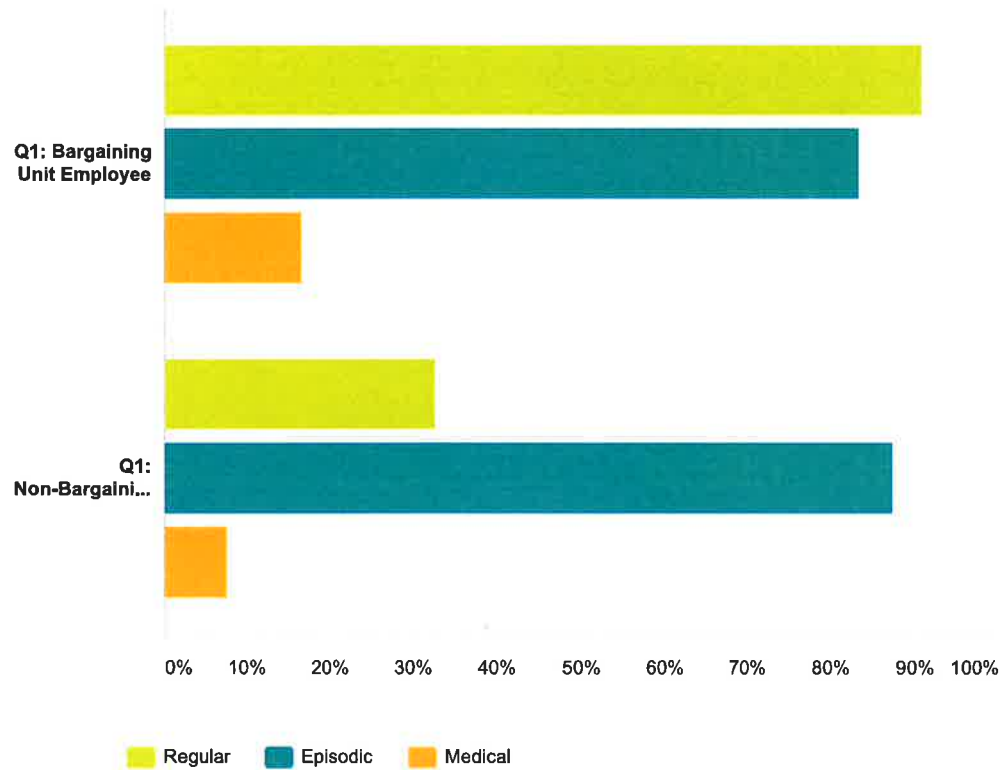
Answered: 126 Skipped: 0



	Yes	No	Total
Q1: Bargaining Unit Employee (A)	90.79% 69	9.21% 7	60.32% 76
Q1: Non-Bargaining Unit Employee (B)	82.00% 41	18.00% 9	39.68% 50
Total Respondents	110	16	126

Q3 Please select which Flexiplace program(s) you have been approved for (select all that apply).

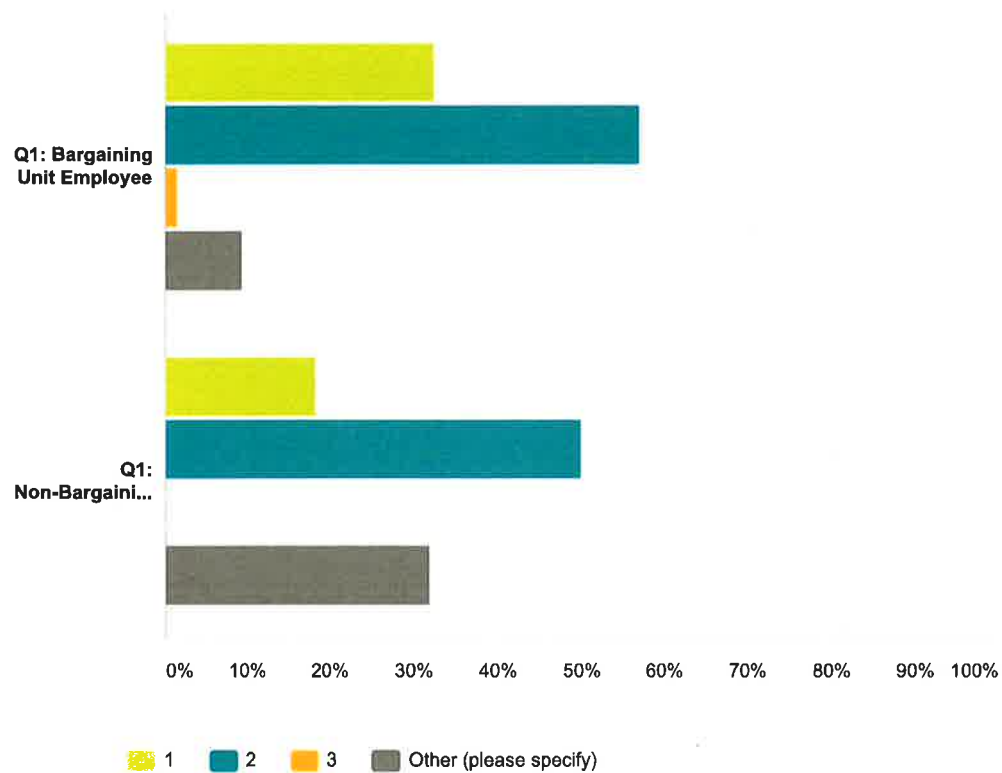
Answered: 107 Skipped: 19



	Regular	Episodic	Medical	Total
Q1: Bargaining Unit Employee (A)	91.04% 61	83.58% 56	16.42% 11	119.63% 128
Q1: Non-Bargaining Unit Employee (B)	32.50% 13	87.50% 35	7.50% 3	47.66% 51
Total Respondents	74	91	14	107

Q4 For Regular Flexiplace, how many days do you telework per pay period?

Answered: 87 Skipped: 39

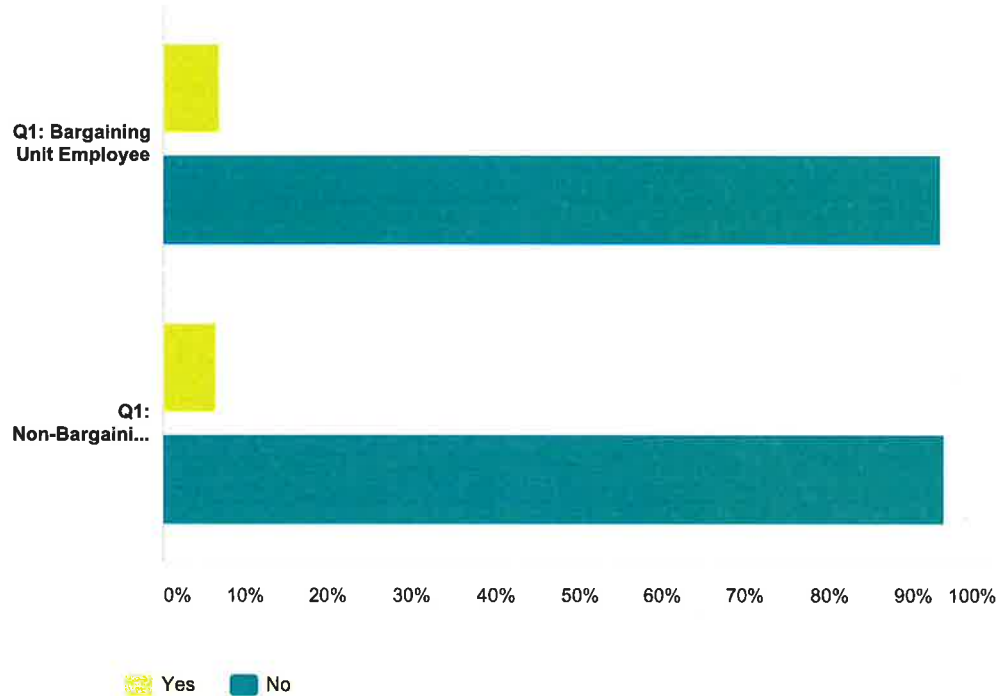


	1	2	3	Other (please specify)	Total
Q1: Bargaining Unit Employee (A)	32.31% 21	56.92% 37	1.54% 1	9.23% 6	74.71% 65
Q1: Non-Bargaining Unit Employee (B)	18.18% 4	50.00% 11	0.00% 0	31.82% 7	25.29% 22
Total Respondents	25	48	1	13	87

#	Q1: Bargaining Unit Employee	
1	Less than 1 per pay period on average	
2	4	
3	Periodically	
4	One or two days a year on average	
5	always on regular and sometime one episodic when I can!!	
6	5 days per week	
#	Q1: Non-Bargaining Unit Employee	
1	Episodic	
2	None	
3	only when necessary	
4	only during inclement weather	
5	sporadic	
6	none	
7	Infrequently, when it is necessary	

Q5 Have you ever requested and been denied participation in a Flexiplace program(s)?

Answered: 122 Skipped: 4



	Yes	No	Total
Q1: Bargaining Unit Employee (A)	6.76% 5	93.24% 69	60.66% 74
Q1: Non-Bargaining Unit Employee (B)	6.25% 3	93.75% 45	39.34% 48
Total Respondents	8	114	122

Q6 Please explain the reason Management gave for not approving your Flexiplace request.

Answered: 8 Skipped: 118

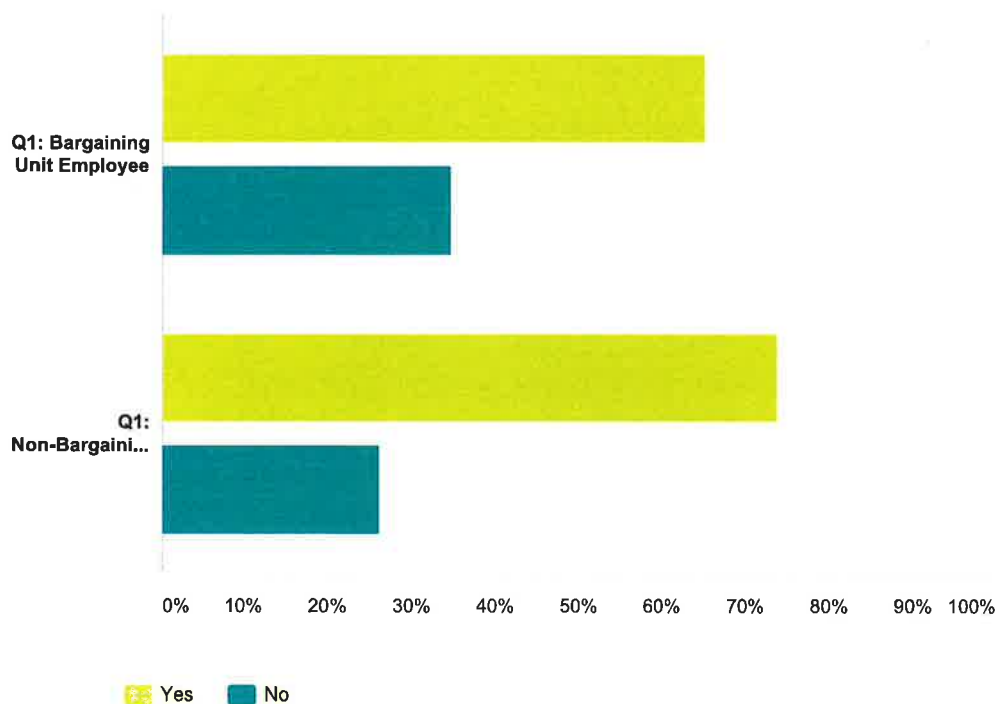
	Please explain the reason Management gave for not approving your Flexiplace request.	Total
Q1: Bargaining Unit Employee	100.00% 5	62.50% 5
Q1: Non-Bargaining Unit Employee	100.00% 3	37.50% 3
Total Respondents	8	8

#	Q1: Bargaining Unit Employee
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1	Not being timely in arrival	
2	My position doesn't require enough out-of-office work to participate.	
3	My manager has denied my episodic flexiwork requests in the past because they "established a pattern" which resembled regular telework (e.g. requesting to episodically telework several Mondays in a row).	
4	This occurred several years ago. I was given permission to work episodic for several days on a special project. After the first day, that permission was withdrawn. Senior management said it was because the supervisor only had approved - not the asst staff director.	
5	Did not qualify due to low score on annual appraisal.	
#	Q1: Non-Bargaining Unit Employee	
1	Contract employees are not allowed to work Flexiplace although it would be an excellent incentive for them as well as your employees.	
2	No reason given	
3	I was denied because the General Counsel would not let NBU employees telework despite the fact that NBU employees working for the Staff Directors had been teleworking for many years. My request was repeatedly denied. When telework pretty much became mandatory per OPM in sometime around 2010-2011, I believe, I was not told about it until about 6 months later. The whole issue was handled extremely poorly. [REDACTED]	

Q7 Do you believe the Flexiplace program(s) were implemented fairly and equitably?

Answered: 118 Skipped: 8



	Yes	No	Total
Q1: Bargaining Unit Employee (A)	65.28% 47	34.72% 25	61.02% 72

Q1: Non-Bargaining Unit Employee (B)	73.91% 34	26.09% 12	38.98% 46
Total Respondents	81	37	118
	If No, please explain		Total
Q1: Bargaining Unit Employee (A)		26	26
Q1: Non-Bargaining Unit Employee (B)		12	12

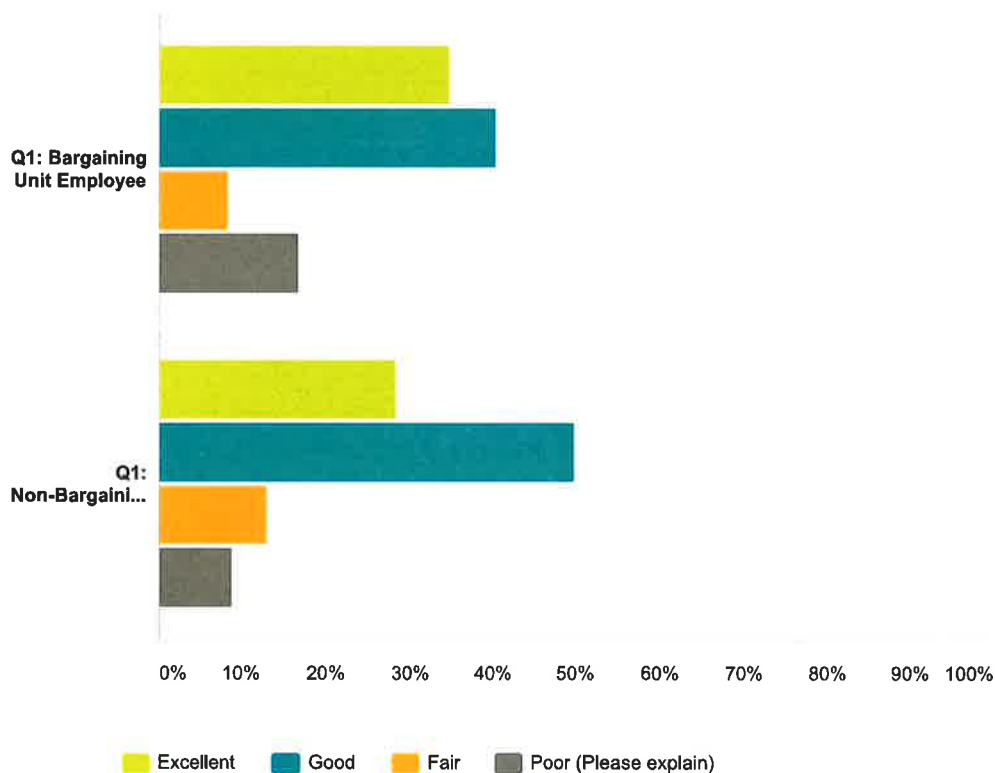
#	Q1: Bargaining Unit Employee	
1	I've heard rumors that a senior staffer is allowed to telework 24/7 from California. Is this true?!?	
2	The rules are very narrow and it does not allow much flexibility.	
3	Not all offices qualify. Either all offices should qualify or NO ONE should be allowed to participate.	
4	Management may stay home when minors are ill, while technically, I may not. My child is old enough both to distract and care for him/her self, and would understand that I cannot stop working.	
5	I don't really know the answer to this, I've heard of other divisions having issues and/or people being denied	
6	Even though I'm in an administrative position, I believe I have an adequate amount of work to participate in the program.	
7	The program is unequitable because managers are given the opportunity to telework several days of the week unlike their subordinates.	
8	It is my understanding that an OGC employee has been participating essentially full time while living out of state. This is way outside the parameters of the LMA Flexiplace agreement and creates, at minimum, the appearance of favoritism, along with how enforcement cases are assigned. Other OGC employees appear to telecommute more than once a week and some for days or a week at a time. I do not know the facts involved in those cases and discretion by supervisors should be allowed but that factor is not part of the Flexiplace agreement and results in the appearance of favoritism, minimally, and inequity if one's supervisor is not as flexible.	
9	Some employees' episodic requests are denied. Others are not.	
10	I believe some divisions are not allowed to telework, or can only do so occasionally. I think everyone should have that option across the board and levels.	
11	I have heard that some employees have been cleared for unlimited "episodic" telework permitting them to only come to the office on days that the Commission meets in Executive Session. There are rumors that this person lives out of state. Other people are held to the letter of the program and have been required to request multiple letters from their doctors - i.e. the form must contain certain management approved wording or the doctor's form is rejected.	
12	Management rarely does anything fairly or equitably.	
13	Not all employees are approved for Flexiplace (Regular and Episodic) while their colleagues performing the same type of work are. Approval of episodic flexiplace is a big problem in some divisions. Some supervisors are flexible and approve episodic applications frequently, while other supervisors pose hurdles and only approve episodic for "favorite" employees. The amount of episodic flexiplace granted is also inconsistent. In one division there is an employee who has been working a full time episodic telework arrangement from outside the DC area for months now but when others have asked for a similar arrangements for special circumstances and only for a short period of time (such as a week or two) they have been denied.	
14	I only say no as I do not know if they are or not. I have heard people complain that they are not allowed and I feel pretty certain that some of the same managers who don't want us using it more than once a week do use it whenever they feel like it. kinds, do as I say, not as I do..not good for morale	
15	*were	
16	I think that for the most part, it has been implemented fairly and equitably except for those instances where specific preferences are provided to certain employees that are not made available to others like being able to telework from a remote workplace outside of your designated work place, i.e., in another state for a prolonged period of time. That opportunity if afforded should be afforded to anyone who may request such an accommodation.	

17	Somtimes it is in my belief that managers hold telework and flexiplace schedules over regular employees heads due to their ability to "reward" employees versus having it a truely open program.
18	At first management made it seemed that only people with a medical condition could work a flexi schedule.
19	I know that some secretaries in some divisions are allowed to telework, but not in others. Why isn't this consistent?
20	I feel everyone should be able to do flexiplace because all of our work is monitored on the server and I believe that even with a low score, if a person gets to do flexiplace, they may end up being more productive. Some managers and some divisions have more episodic and some are not allowed to take episodic as much or not at all.
21	Some of my colleagues report being able to telework (beyond one day per week) to address day care issues, child care issues, spousal convenience/coordination issues and personal scheduling issues. My supervisor generally only permits me to telework on my one scheduled day and anything more requires a good deal of explanation and justification while at the same time, a team member of mine appears to only need to mention that she has a sick child, school is closed or her spouse can't pick up the kids in order to be granted additional teleworking days. [REDACTED] [REDACTED] it would make my days a lot easier, as well, if I could have additional teleworking days like some employees are permitted. Some people on "medical" teleworking seem to be milking the situation for all it's worth because they don't want to come into the office to perform their [REDACTED] any more than anyone else. Some of these folks just seem to have doctor's where getting a "note" is no problem and resulting in their medical "advantage" continuing for months or years. If additional/regular teleworking days are permitted, as a rule, the program would feel more fair and the handful of people "working" the flexiplace program might stop doing so.
22	I have a wonderful team leader who has implemented the Flexiplace program for our team fairly and equitably. But I am aware of any number of other bargaining unit members who are not so fortunate. Their managers construe the Labor Management Agreement as narrowly as possible to limit their opportunities to participate in the Flexiplace program, or else erect hurdles to make the program less effective. For example, certain managers ignore those employees who are working Flexiplace, even if they are available to work, or they will implement additional administrative procedures to prevent more members of a particular team from teleworking on the same day.
23	I don't know.
24	It appears that some individuals have been granted flexiplace more extensively than others without explanation, and not consistent with current flexiplace terms.
25	Flexiplace should be available to employees in all positions.
26	Depends on current negotiations
#	Q1: Non-Bargaining Unit Employee
1	I believe that non bargaining staff should be allowed to take advantage of the telework the same as bargaining staff
2	Support staff have not been included. Only since the renovations. It seems as though some staff are considered more important and are offered this program on a regular basis. When the water main break occurred, certain staff were informed that if they deemed it necessary for health reasons, they were permitted to telework until ? Support staff did not seem to be included. Totally unfair.
3	No because if they were fairly and equitably, contract employees would also be allowed to participate which would allow them an opportunity to work at home. If they abuse it, by all means it should be taken away. I feel they should be given similar benefits provided for your employees because for the length of their contract they have pledged their loyalty to FEC.
4	Seems like a lot of managers get to telework a lot.
5	The participation in the Flexiplace program is currently tied to annual performance. Many believe that it should not be so.
6	My office doesn't allow it
7	I am disturbed by the number of managers who are regularly teleworking "episodically." I wonder who is authorizing their telework.
8	If seems at first the policy was fair but it appears recently an OGC employee has been allowed full time telework from Boston. This isn't fair since it was denied to several past employees.

9	Within teams in the same division there is a wide variance between who can use it and under what conditions.	
10	For the most part, I believe it is, however, I think that anyone should be allowed to telework (if eligible) episodically if there is a project that they can perform at home and would not cause any inconvenience to the agency. The supervisor should be able to determine if a project qualifies for telework and make the call.	
11	No, because of my experience before 2012. In 2012 I was finally allowed to telework and I have been very happy with it, but I also have a different supervisor who is very reasonable.	
12	Some employees get to telework more than 1 day per week and it is not known if the reason is due to episodic.	

Q8 How would you rate the Flexiplace program(s)

Answered: 118 Skipped: 8



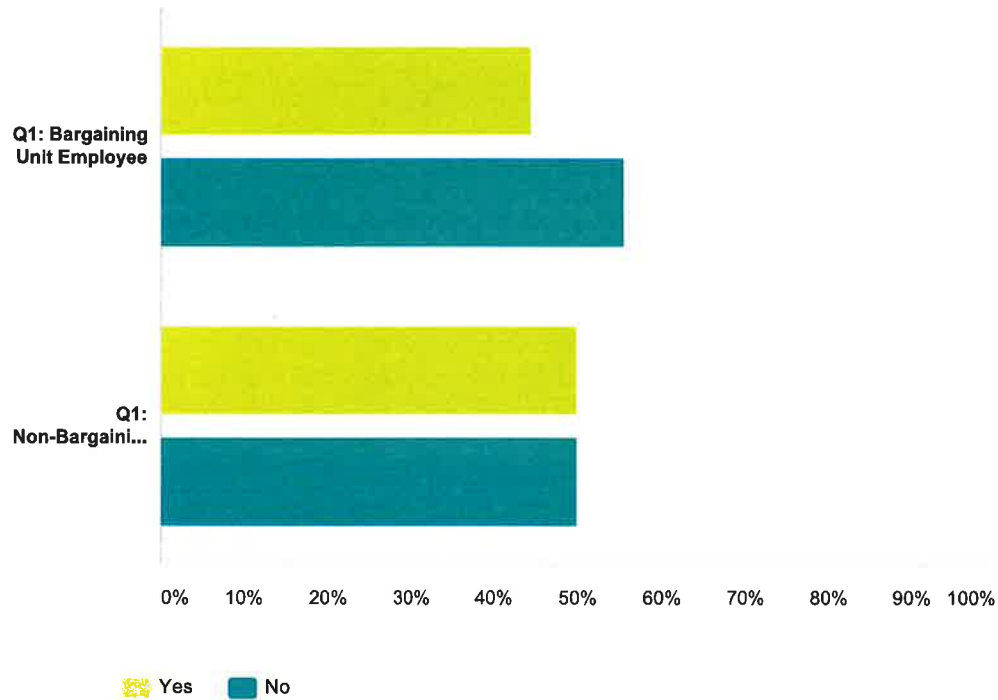
	Excellent	Good	Fair	Poor (Please explain)	Total
Q1: Bargaining Unit Employee (A)	34.72% 25	40.28% 29	8.33% 6	16.67% 12	61.02% 72
Q1: Non-Bargaining Unit Employee (B)	28.26% 13	50.00% 23	13.04% 6	8.70% 4	38.98% 46
Total Respondents	38	52	12	16	118

#	Q1: Bargaining Unit Employee	
1	Too restrictive as to where I work offsite. Why can't I work from my parent's home as well as mine? Why does the commission care whose dining room table I'm sitting at?	
2	I rate poor because of where I work, I am not eligible.	

3	Not enough days available and restrictive as to where you can actually work. With a phone and secure internet connection my job could be done anywhere	
4	I am happy to have the option to telework, but most other agencies have better telework policies.	
5	It is a decent start, it just needs to expand. I commute more than 3 [REDACTED] a day. And truthfully, there is no reason for it. I could work at home alot more, be more rested, [REDACTED] [REDACTED]	
6	The schedules of the staff have overtaken the mission of the agency. When people are allowed to have schedules that vary all times each day it is difficult to get work completed. While only a few in my division are in the program, the schedules of a few dictate meetings for all.	
7	We should be allowed several more days per pay period, like almost all other agencies. If management has legitimate reasons for not expanding telework, they should communicate it to all staff in a public forum. Absent that, it appears they just mistrust their staff and it's an issue about power and control.	
8	There should be more flexibility on starting and ending times and you should be able to take longer breaks as long as you complete the total hours of work for the day. We should be able to work 2 days from home as regular flexi and any day where we do not have to attend meetings in person, we should be granted episodic flexiplace as requested. Total flexi days should be allowed to taken in any days during the 2-week payroll period. There should be better training for all employees that is mandatory on using technology such as sametime, adobe acrobat, online meetings, and teleconference. Too many people who do not support flexiplace and do not request flexiplace still want to conduct business when those on flexiplace come back into the office because they are not familiar with the technology to use where you can work together online on documents and/or conduct meetings online.	
9	Poor because we are only permitted to telework one day a week. Poor because the program is not administered fairly within teams nor across teams.	
10	I would rate the Flexiplace program as good, but this program forces me to rate it as poor in order to leave comments. As noted above, my manager maximizes our team's opportunities to utilize Flexiplace. But I know there is inconsistent implementation of the program within divisions and throughout the Commission. It appears that managers would benefit from additional training on how to implement flexiplace, and should be encouraged by senior management to allow employees to maximize flexiplace to benefit all Commission employees. The program would be better if there were more opportunities for regularly-scheduled flexiplace, better training for managers regarding the use of flexiplace and the value it adds for the Commission, and if the budget could provide additional and improved technology to support flexiplace.	
11	More flexiplace days and more flexibility for episodic would be good.	
12	I do not participate myself, but man others desire more opportunities	
#	Q1: Non-Bargaining Unit Employee	
1	No benefits for the contract employees but otherwise fair to the employees of FEC.	
2	Disparity in who gets to use it. Managers are treated inconsistently. NBUs aren't sure where they stand on the ability to use it.	
3	Being in the office matters. People say too often it's my flexi day so I'll get you that when I'm back in the office. Or it's his flexi day so check back tomorrow.	
4	Not enough days to telework, need to have at least two	

Q9 Do you have any other issues/concerns related to the Flexiplace programs?

Answered: 114 Skipped: 12



	Yes	No	Total
Q1: Bargaining Unit Employee (A)	44.44% 32	55.56% 40	63.16% 72
Q1: Non-Bargaining Unit Employee (B)	50.00% 21	50.00% 21	36.84% 42
Total Respondents	53	61	114
	If Yes (please explain)		Total
Q1: Bargaining Unit Employee (A)	34		34
Q1: Non-Bargaining Unit Employee (B)	23		23

#	Q1: Bargaining Unit Employee	
1	Access to FEC electronic in-house files and e-mail keeps going down.	
2	Should be expanded to permit more regular days per pay period.	
3	I would prefer more days per week.	
4	See my answer to question 4	
5	I feel as though it is still somewhat stigmatized in my office, although I get as much or more work done at home.	
6	Should be allowed more days per pay period.	
7	I think the Flexiplace program has very valuable to the agency. The program enhances productivity, while also providing some additional family-friendly flexibility to staff.	
8	Using episodic flexiplace is discouraged by our division. We are allowed the one day a week for regular flexiplace but are discouraged from asking for more than one day.	
9	I believe administrative positions should be allowed to participate in the flexiplace program.	
10	I think it would be efficient to allow employees at least four telework days per pay period, two per week. Both employees and the agency would save money from eliminating an additional day of commuter costs.	

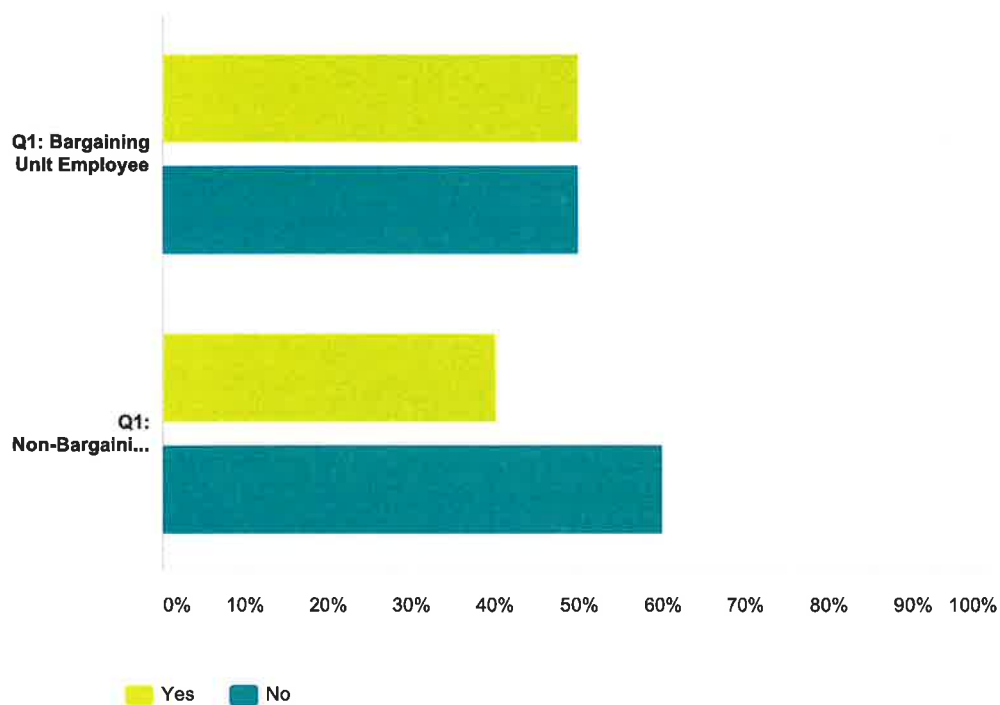
11	I would hope that the number of days that non-managerial employees are allowed to telework increases in the future. Also, IT should increase the number of "spaces" allowed for users to log into the remote system so that telework eligible employees are not "fighting" for slots. This issue potentially leads to a slow in productivity.	
12	There are some technical problems with accessing certain programs while teleworking that we have to use frustrating work arounds to solve. Some example are: log back out and in of VPN to start Bria every time, open the home folder to log on to Lotus Notes, and VPN time out after eight hours. These issues are small, but since they are small, it seems like they should not be difficult to fix. The amount of work arounds we have to perform to log on for telework keep building up with no permanent solutions.	
13	Lack of training/information on phone usage while teleworking. Many of us forward our work phones to our home phones on our regular telework day. If you forget to do it, IT's assistance is required. Also, no one has ever explained whether our personal home phone numbers appear in a call recipient's caller id if we use our home phones, forwarded from our work phones, to make business calls. If so, this can breach of our privacy. There also seems to be a program either tied to our digital phone service or via software to notify one that someone has left a voicemail and possibly to display the v-mail message. Some OGC divisions appear to have this capability but it has never been widely explained or offered to everyone.	
14	There should be 2+ days added per pay period for telework. The work being performed in the office during the week is all on the computer. Coworkers and external business can be contacted by phone or by email the same in the office as they would be at home. The flexibility of working at home increases morale and efficiencies at work. By adding 2+ telework days per pay period, production and employee satisfaction can increase.	
15	Not sure why its tied to the performance evaluation and the overall score is more than it is for a promotion.	
16	Why does the FEC management place so many restrictions on telework? If I can do my work from home, why does it matter how many day I am physically in the office?	
17	I would like to see more telework options (for example, 4 per pay period). I would also like to see better quality in our technologies to allow more telework options for everyone. For example, being able to conduct required meetings remotely.	
18	They discriminate against parents by not allowing them to work at home while monitoring sick kids. Parents should be allowed to be the best judge of when they can work and for how long under those conditions.	
19	Managers need more training on how to supervise remote employees. Many times they deny flexiplace applications because they want you to be available for face-to-face communications, but we can go an entire work week without even seeing our supervisors at the office. Even when we are in the office they still communicate by e-mail or phone. What is the difference if they communicate with you by phone and e-mail and you are simply responding from your telework location. Many other agencies offer more expansive telework pograms, and there are many employees who are actively looking for positions at those agencies in order to increase their work flexibility and work-life balance. The FEC should consider expanding the program in order to retain employees.	
20	Please see comments above.	
21	I think we should be able to take episodic flexiplace when we are mildly sick (like with a cold virus), rather than have to use up our sick leave.	
22	I seriously question how much work is getting done from people who work those long hours.	
23	I think that where appropriate, employees should be afforded the opportunity to take advantage of the program for more than one day per week as long as you are performing your work duties satisfactorily.	
24	Sometimes when you work 5 days a week via telework you lose the feeling of being a part of the team. You lose the viability and sense of what your purpose is. Their should be programs that include those that have to work 5 days via telework and bring them back into the FEC family.	
25	Bria is awful	
26	I would like to be able to work more days at home on a regular basis. If possible, the commission should consider additional online meeting collaboration software to make out of office communications/meetings easier. Flexiplace schedules often need to be adjusted or work at home days are cancelled based on short meetings that could just as easily be handled over the telephone, if communcation software was better. These unscheduled adjustments make it difficult to determine transit subsidy requests a month in advance. One suggestions would be to revise the transit subsidy policy to reflect actual costs incurred, rather than the number of days in office. Another suggestion to revise this policy would be to allow prorated adjustments in the following month, if necessary.	

27	That a supervisor can take away the privilege based on performance. In my case when this happened to me, I became less productive as it ended up costing me more financially for transit, dry cleaning, food, etc. and decreased my personal time for relaxation which created more stress in my personal life and in turn made me less productive at work. My work-life balance was terrible. Employees in secretarial jobs and admin jobs in one division are all off on the same days and these are the jobs where someone needs to physically be in to type or mail or do some other task that cannot be done from a remote location. If there are 3 admin people, only one should be on flexiplace each day so that the other 2 are backups in case one of them is sick.	
28	See above comments.	
29	Would like to increase number of telework days per pay period.	
30	Managers who stigmatize employees for using Flexiplace need additional training. Flexiplace provides significant cost savings to employees and the Commission, as well as reduces stress and environmental impacts of commuting. Flexiplace programs are only increasing within government as well as in the private sector, and the Commission should get on board to maximize the value of such programs.	
31	Some people get lots of episodic. Others do not.	
32	There needs to be better IT support for people working from home.	
33	See question 6 response, above.	
34	Give us more telework days/pay period!	
#	Q1: Non-Bargaining Unit Employee	
1	The program doesn't clearly address provisions for inclement weather. During inclement weather, the expectation is that episodic teleworkers continue working as normal, without consideration for the fact that driveways and sidewalks need to be shoveled within two hours of snow stopping. If the Federal Government is closed, I don't think it should be mandatory that anyone perform work simply because they had an approved telework day (episodic or regular).	
2	How do you measure its success in terms of both productivity and work/life balance	
3	it relates to those who answer the main phones for each division -- is there a program, software, or some kind of work-around that will allow a flexiplace participant to answer the main phone lines from their off-site location?	
4	I believe the could be expanded to allow for more telework days.	
5	Throughout the FEC it completely carries as to who and how telework is implemented. Two division especially have no program in place, the CIO & CFO division. Some telework 3 days or more a week, even a contractor...	
6	As a manager, it strikes me that one loses both an element of sponteneity and the subtleties of non-verbal communication when communicating with people who are teleworking. I think it would work far better if everyone had Skype or some other ability to videoconference.	
7	How come managers get to telework so much?	
8	I think everyone should have that option, considering how bad traffic is here and if we're sick we can still work from home without having to take leave	
9	Reduces efficiency and increases administrative tasks of professional staff and managers who are required to perform certain tasks on hard copies.	
10	I don't think people are following the proper protocols, including forwarding their office phones to their home numbers.	
11	Although some staff are quite productive on their telework days, others treat them like vacation days. There needs to be a quick, simple process for supervisors to revoke telework privileges for the employees who abuse them.	
12	It has become very difficult to schedule meetings with staff in different divisions because of different telework days. Some managers demand a full accounting of everything done on a telework day and others nothing. Needs much more oversight.	
13	The Commission should think about approving more regular telework days per week other then just one day.	
14	For the most part, productivity is significantly down since the program's implementation. It's almost impossible to locate people when the are flexing and scheduling meetings is also difficult.	

15	The technology is not completely compatible for those working more than episodic.	
16	I don't participate in the flexiplace program because I don't feel it is easily accessible to my work. However, sometimes I feel like I am being pressured into it when I choose not to participate.	
17	Managers need ensure that there are enough staff people available, especially support staff. This puts too much of a burden on the few support staff in the office. Those teleworking need to make sure they forward their phones, take necessary materials they need to complete their tasks at home. It seems that I have assisted in a lot of key tasks that an attorney should be responsible for doing. It is inconvenient, especially if other support staff are teleworking as well. They should be able to complete most of their tasks without too much inconvenience to those at the office. Managers are not following up to ensure that whatever tasks should have been completed are completed, whether or not the employee actually has enough work to do while at the ADS. I am also not sure if the follow up with the managers second signature as to whether the task(s) was completed successfully or not, are being submitted.	
18	I think we should be allowed to work regular flexiplace more than one day per week, as many other agencies are permitted to.	
19	I understand that there are individuals who are teleworking more than the program generally permits in this division, either because they were granted additional teleworking due to illness and that illness has ended but they have continued to telework more than the standard program permits, or because they moved away from the Washington, DC, area and they now telework nearly full time. While I do not begrudge teleworking beyond the standard program, the above-noted exceptions raise questions of fairness and favoritism. I am not aware, however, of anyone being unfairly denied standard participation in the program.	
20	Supposedly, OGC has staff working from other sites (Boston). Why are some staff allowed to work from remote sites and others are not? Same rules should apply for all employees.	
21	It's a huge productivity loss, especially the regularly scheduled	
22	The VPN is not always reliable.	
23	Employees teleworking are sometimes non-responsive to requests from other employees in the office.	

Q10 Have you ever reported your concerns/issues related to the Flexiplace program?

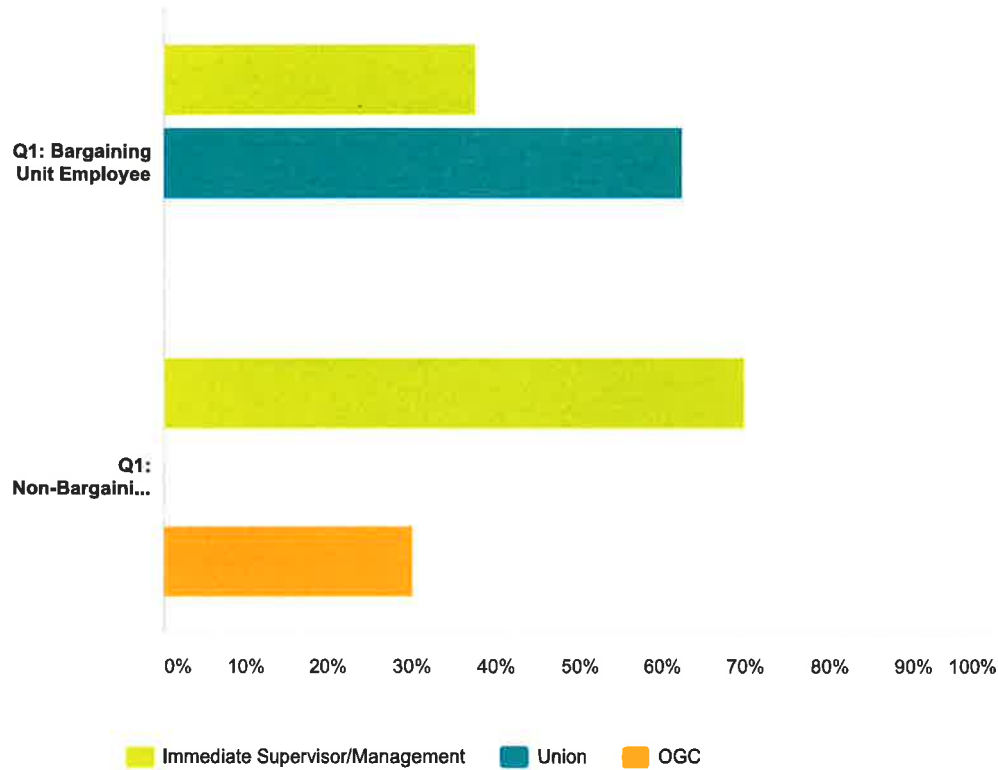
Answered: 59 Skipped: 67



	Yes	No	Total
Q1: Bargaining Unit Employee (A)	50.00% 17	50.00% 17	57.63% 34
Q1: Non-Bargaining Unit Employee (B)	40.00% 10	60.00% 15	42.37% 25
Total Respondents	27	32	59

Q11 Who did you report your concerns to?

Answered: 26 Skipped: 100



	Immediate Supervisor/Management	Union	OGC	Total
Q1: Bargaining Unit Employee (A)	37.50% 6	62.50% 10	0.00% 0	61.54% 16
Q1: Non-Bargaining Unit Employee (B)	70.00% 7	0.00% 0	30.00% 3	38.46% 10
Total Respondents	13	10	3	26

	Other (please specify)	Total
Q1: Bargaining Unit Employee (A)	3	3
Q1: Non-Bargaining Unit Employee (B)	1	1

#	Q1: Bargaining Unit Employee
1	IG
2	I have told UNion, direct manager and upper manager
3	also IT
#	Q1: Non-Bargaining Unit Employee
1	head of HR

Q12 What was the outcome?

Answered: 26 Skipped: 100

	What was the outcome?	Total
Q1: Bargaining Unit Employee	100.00% 16	61.54% 16

Q1: Non-Bargaining Unit Employee		100.00%	38.46%
		10	10
Total Respondents	26		26

#	Q1: Bargaining Unit Employee	
1	They're working on it.	
2	The issues are still being work on.	
3	It is an IT issue that we have no control or ability to solve.	
4	Only with regard to the phone issue. My supervisor has not had a chance to ask about it. With regard to the employee who lives out of state, my understanding is that it was fairly widely suspected given the employee's absence from the office.	
5	Not sure - I think negotiations are going on now	
6	contract negotiations, arbitration	
7	I believe theyare in the process of union contract re-negotiations for parts of the labor agreement.	
8	My concern was rebuffed by senior management.	
9	The union addressed the specific situation with the supervisor and clarified misunderstandings about the flexiplace program. I don't know what the outcome was with any reports made to the IG.	
10	All seemed to take it under consideration and be open to expanding it.	
11	Nothing, because the contract doesn't permit the use of flexiplace instead of taking a sick day.	
12	told that mid-term negotiations were upcoming and these type of issues would be addressed	
13	Nothing has changed yet.	
14	no update so far	
15	Still working on this.	
16	I was told that the issue would be addressed and clarified through Union negotiations with management. It's been more than a year, there has not been any change.	
#	Q1: Non-Bargaining Unit Employee	
1	I was told that this was the interpretation of the Bargaining Agreement verbiage.	
2	They agreed, but we also all agreed that it wasn't realistically going to happen any time soon due to budget constraints.	
3	Flexiplace keeps on expanding at the insistence of the union even though it hinders mission accomplishment.	
4	Pending.	
5	Nothing	
6	It was used in prep for Union negotiations	
7	Nothing happened. I repeatedly spoke with my supervisor, [REDACTED] no resolution. I was repeatedly told I could not telework even though I did not supervise employees and had an outstanding rating.	
8	Employee is still working from Boston as far as I know.	
9	wide spread agreement, but resignation that we have no choice	
10	VPN has worked better more recently.	

Q13 Is there anything else you wish to add?

Answered: 47 Skipped: 79

	Is there anything else you wish to add?	Total
Q1: Bargaining Unit Employee	100.00% 33	70.21% 33
Q1: Non-Bargaining Unit Employee	100.00% 14	29.79% 14
Total Respondents	47	47

#	Q1: Bargaining Unit Employee	
1	it is very efficient and increases productivity. you are not risking your life in traffic, you can be productive right away.	
2	I'm currently on detail and thus not participating in flexiplace for the moment, so I'm answering these questions based on my pre-detail experience.	
3	The Flexiplace program is a valuable asset to the agency. The amount of time and resources gained by eliminating one or more days of commuting per pay-period is a decidedly positive contribution to the efficiency of the workplace, the environmental impact of commuting, and the work-life satisfaction of professionals.	
4	As I said earlier, it should be available to all, not just the "select few".	
5	I would like to have another day to telework.	
6	No	
7	For regular flexiplace, I would like to see an increase in the number of telework days available per pay period.	
8	It is an excellent program that should be expanded if possible. I would like to be issued a second laptop (to be kept at home) so that I do not need to carry mine back and forth and so that I am flexiplace ready when there is a weather closure or other emergency.	
9	NO	
10	No.	
11	No.	
12	I would like the agency to evaluate whether some of the positions could qualify for 100% telework. It would be very helpful to be able to live outside of the DC commuting area.	
13	Inequitable treatment, real or perceived, is one of the few controllable factors that contribute to low morale. Discretion shouldn't be discouraged, but it should be made known to everyone the types of circumstances under which it may be granted (without violating any specific person's medical privacy).	
14	[REDACTED]	
15	It would be nice to have an additional telework day.	
16	No	
17	A lot of our work is increasingly able to be completed electronically. I hope that having more telework options will soon be available across the agency. I also hope with the increase demand of teleworking, our technologies will offer adequate support to keep a healthy balance of communication among peers and management within the agency.	
18	Some of the questions in this survey were unclear. For example, it was unclear whether the question asking if you've ever been denied for a flexiplace program pertained to an application for regular, episodic or medical telework.	
19	[REDACTED] [REDACTED] [REDACTED] [REDACTED] The Flexiplace program allowed me to fulfill my responsibilities as an FEC employee without causing undue harm/stress to myself.	

20	Lets move our agency into the 21st century. Lets have happier more productive employees. make our lives just a bit easier so that we don't spend 15 hours a week commuting to do the same job we could do at home.	
21	Hope the FEC continues to expand its use of flexiplace and upgrades the VPN server.	
22	Are problem employees being allowed in the program. Allowing Flexiplace to inconvenience and/or unfairly burden non-participating employees. Inadequate planning and preparation can lead to this situation which causes both morale and job performance problems. Allowing employees in the program without adequate Flexiplace training. Employees and their supervisors need to understand the relevant policies, procedures, and other factors associated with successful operation of Flexiplace. While policies are in place, to many people have special privileges that should not be granted.	
23	It would be nice to participate in at least two telework days per week.	
24	Telework is a great option for an agency like the FEC. it would be a great benefit for employees tp increase the number of allowed regular telework days per pay peiod.	
25	no	
26	No	
27	no	
28	Flexiplace is better for the entire agency. It should not be a management boon that they can gift those whom they like and not give to those who they do not like or those they consider low performers. Flexiplace increases an employees free time and lowers their expenses and therefore I feel it is generally a great morale builder for all employees, creating long-term increases in productivity with a happier workforce.	
29	We should be permitted to regularly telework a minimum of two days a week. Three or more, without having to jump through hoops would be even better.	
30	No	
31	No.	
32	It would be great if the LMA allowed bargaining employees to telework atleast 4 times a payperiod.	
33	Great program that adds work/life flexibility	
#	Q1: Non-Bargaining Unit Employee	
1	No.	
2	I am in a management role and the telework program for managers is not in a formal document.	
3	Again as a non bargaining employee I would like to take advantage of the flexiplace the same as the bargaining employees	
4	Please consider allowing the contract employees this benefit. It would be most rewarding to anyone to have the option to work from home.	
5	Thank you for looking into this. As some really follow the policies put in place in their divisions, others have nothing.	
6	Further expansion of flexiplace will further decrease efficiencies and increase administrative burdens on supervisors and professional staff.	
7	Please don't expand regular telework beyond one day per week. It would be too disruptive of the collegiality and collaboration of the office.	
8	If the union gets additional days the policy should be revised to make it clear that if needed, staff must change a scheduled day. More training for managers to oversee work that is not measured.	
9	This program is one of the largest frauds I have witnessed at the FEC. IT personnel who use the program can never be reached. OGC attorneys basically use the program as an off-day. Staff believe it's a right to stay home and will not come in when work load demands require it.	
10	Regular flexiplace has been a difficult transition and the results have been spotty. Puts too much pressure on first line supervisors to maintain productivity.	
11	I do feel there should be more accountability in some areas of the program.	

12	I think having this program is very useful, especially on those days when there is bad weather and the option for telework is given. It allows work to continue so that we are able to be productive and meet the Commission's objectives.	
13	I do not beleive that all positions have sufficient work to do at home.	
14	This isn't about management doing a better job--the whole world knows its more or less a dodge.	



MEMORANDUM

To: Lynne McFarland
Inspector General

Through: Alec Palmer *AP*
Staff Director

From: Edward W. Holder *EWH*
Telework Management Officer

Date: June 13, 2016

Subject: Management Response to Audit of FEC's Telework Programs Draft Report

The Telework Management Officer (TMO) has reviewed the subject report, and is in general concurrence with the findings and recommendations contained therein. Attached is a draft corrective action plan (CAP) that addresses each finding individually, with a date of estimated compliance. Management has unilaterally taken action to correct some of the OIG's concerns, by updating policies that deal with episodic telework and accurate recording of time in WebTA. The CAP presents a plan to address the other OIG concerns, as well as each of the 11 recommendations.

Telework Audit Corrective Action Plan

No.	Recommendation	Management Response	Current Status	OIG Comment
1	Managers should ensure that episodic telework is only used for its intended purpose, which is defined in the OPM Federal telework guidance and the FEC telework policies as "sporadic, or for a short period of time."	Both the Bargaining Unit and Non-Bargaining Unit Telework policy defines episodic telework and that it should not coincide with regularly scheduled telework to expand the limits of regular telework. Telework training stresses this point as well. Non-compliance is part of the annual program review guidance to be developed.	To be incorporated in a to be determined annual review procedures. Estimated completion Sept 2016	
2	The TMO or designee should periodically monitor telework activity to ensure episodic telework is being used properly, and to identify excessive use of episodic telework. The OIG suggests that WebTA telework reports could be generated to assist in this process.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTa reports to be developed.	To be incorporated in a to be determined annual review procedures. Estimated completion Sept 2016	
3	FEC telework policies should state whether employees can request and/or be granted special telework arrangements (any arrangement outside the normal policy), as well as list the criteria that will be used for determining whether or not an employee can be approved for a special telework arrangement. If special telework arrangements are to be allowed, even if on a temporary basis, they should be documented in writing separate from the standard telework application and should include the anticipated timeframe of the special arrangement. Consideration should be given to have all special telework arrangements approved by the Staff Director, General Counsel, or Chief Financial Officer, as appropriate, along with notification to the TMO.	Special telework requests are handled through the FEC's Reasonable Accommodation Process through the EEO office, with documented evidence that special circumstances exist.	No further action required. Recommend close	
4	The TMO or designee should perform monitoring of the telework programs at least annually. The WebTA telework activity reports could be generated and reviewed to perform monitoring and evaluation of the telework programs. Currently these reports are generated to respond to occasional OPM telework data calls. For example, some of the reports list the names of the employees who telework more days than the policies allow and break it down by the actual number of days teleworked. A sample of employees who appear to telework more days than are allowed per policy could be followed up on to determine if the data is accurate, proper documentation exists, explanations are reasonable, and/or telework activity is not in compliance with applicable policies.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTa reports to be developed.	To be incorporated in a to be determined annual review procedures. Estimated completion Sept 2016	
5	The TMO or designee should implement tools and processes to evaluate the effectiveness of the FEC's telework programs.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTa reports to be developed.	To be incorporated in a to be determined annual review procedures. Estimated completion Sept 2016	
6	The TMO should reinforce the importance of ensuring telework hours are accurately recorded in WebTA before validating time sheets.	Concur with recommendation. New time accounting categories to reflect accurate WebTA documentation have been incorporated in WebTA	Recommend close	
7	Supervisors and managers should ensure telework hours are accurately recorded in WebTA before certifying time sheets.	Concur with recommendation. New time accounting categories to reflect accurate WebTA documentation have been incorporated in WebTA	Recommend close	
8	Management should ensure telework policies and training materials give clear explanations as to when each type of telework pay category should be used. Also, the TMO should hold refresher training.	WebTa and telework training will be updated to reflect additional WebTA categories	Estimated completion Sept 2016	

Telework Audit Corrective Action Plan

9	The TMO or designee should reinforce telework policies and procedures to supervisors and staff annually (and as needed based on results of monitored activity).	Concur with recommendation. TMO to send periodic reminder emails to all staff concerning Telework procedures	On-going	
10	The TMO or designee should implement a control procedure to ensure all employees that are participating in the telework program have an approved telework application on file.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTa reports to be developed.	To be incorporated in a to be determined annual review procedures. Estimated completion Sept 2016	
11	The TMO or designee should periodically (at least annually) assess the telework programs and determine if policies and procedures need to be updated to reflect changes in standard practices and/or update for other reasons.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTa reports to be developed.	To be incorporated in a to be determined annual review procedures. Estimated completion Sept 2016	

Federal Election Commission Office of Inspector General



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