



U.S. Department of the Treasury Office of Inspector General



Management Implication Report

Date of Report: March 24, 2020

Prepared by: (b) (7)(C)
Special Agent

Associated Case: BEP-17-0824-I

Approved by: (b) (7)(C)
Special Agent in Charge

Background

The Department of the Treasury, Office of Inspector General, Office of Investigations (TIG), received a referral from the Bureau of Engraving and Printing (BEP) alleging that BEP Police Officer (b) (7)(C) (b) (7)(C) is committing fraud related to the Federal Employee Health Benefits (FEHB) program.

Findings

Finding #1 – TIG investigations determined that neither the BEP, nor the Department of the Treasury (Treasury), require verification documentation to substantiate a common law marriage when an employee elects a common law spouse and/or dependents to Federal Employee Health Benefits. The BEP and Treasury should consider implementing the following recommendations.

Basis of Finding – TIG investigations found that the BEP does not require documentary evidence of a common law marriage before processing employee benefit forms, allowing unauthorized personnel to be included on an employee's health plan.

Potential Impact – Requiring verification documentation of a common law marriage would prevent Treasury employees from adding unauthorized individuals to the FEHB program.

Recommendation

The BEP and Treasury should consider requiring employees to provide documentation substantiating the existence of a common law marriage when electing a common law spouse and/or dependents to receive employee health benefits. This documentation should be included with the FEHB election form (SF 2809).

The employee may substantiate a common law marriage and associated dependents by including any two (2) of the following documents when submitting a SF 2809:

- A personal affidavit stating when and where the employee and common law spouse mutually agreed to become husband and wife; whether they were ever married, ceremonially or otherwise,

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to anyone else, and the details surrounding the end of any previous marriages (how they were ended, where, and when); and any other details that will help to establish the existence of a husband and wife relationship.

- Affidavits from other persons who know the employee and are familiar with their relationship, setting forth particulars such as the length of time they lived together; their address(es); whether there was any public announcement of their marriage; and whether their friends, neighbors, and relatives regard you as married.
- Deeds showing title to property held jointly by both parties to the common law marriage.
- Bank statements and checks showing joint ownership of the accounts.
- Insurance policies naming the other party as beneficiary.
- Birth certificates naming the employee and their common law spouse as parents of their child(ren).
- Employment records listing the common law spouse as an immediate family member.
- School records listing the names of both common law spouses as parents.
- Credit card accounts in the names of both common law spouses.
- Loan documents, mortgages, and promissory notes evidencing joint financial obligations of the parties.
- Any documents showing that the wife has assumed the surname of her common law husband.
- Church records indicating familial status, including membership information, baptismal certificates of the parties' child(ren), Sunday School registration forms, etc.

Signatures

Case Agent: (b) (7)(C) Date: 03/24/20

Supervisor: (b) (7)(C) Date: 03/24/20