



AUDIT REPORT

Payments to Employees Covered by the Federal Employee Compensation Act



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Report Number 23-06

June 05, 2023



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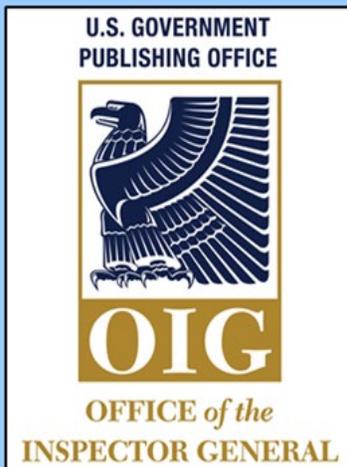
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**OFFICE of the
INSPECTOR GENERAL**
U.S. GOVERNMENT PUBLISHING OFFICE

MEMORANDUM
OIG-23-058

Date

June 05, 2023

To

Director, U.S Government Publishing Office

From

Acting Inspector General

Subject

Audit Report: Payments to Employees Covered by the Federal Employees' Compensation Act, Report Number 23-06

Attached is the subject final report. The U.S. Government Publishing Office (GPO), Office of the Inspector General (OIG) conducted an audit of payments to injured employees at GPO. Our objective was to determine whether GPO is properly paying employees who have sustained work-related injuries or diseases covered by Federal Employees' Compensation Act (FECA).

We reported one finding and three recommendations designed to improve controls of GPO's oversight and management of continuation of pay and review of its FECA cases. Management agreed with the finding and recommendations. We made no substantive changes to the final report, from the draft, based on Management's comments. We include a summary and analysis of Management's comments on page eight and they are included in their entirety in Appendix D. The planned corrective actions should resolve the issues identified in the report.

If you have any questions or need additional information, please contact Lori Lau Dillard, Assistant Inspector General for Audit, at llaillard@gpo.gov.

A handwritten signature in cursive script that reads "Nathan J. Deahl".

NATHAN J. DEAHL
Acting Inspector General

Attachment

RESULTS IN BRIEF

What We Did

The Office of the Inspector General (OIG) Audit Division reviewed the U.S. Government Publishing Office's (GPO) payments to injured employees (Project Number A-2021-002). Our objective was to determine whether GPO is properly paying employees who have sustained work-related injuries or diseases covered by the Federal Employees' Compensation Act (FECA).

What We Found

Finding 1. Oversight and Management of COP and Case Review under FECA.

In general, GPO is properly paying employees who have sustained work-related injuries or diseases covered by FECA. However, opportunities exist for GPO to improve its oversight and management of continuation of pay (COP) and review of its FECA cases. Specifically, we found that GPO paid COP benefits to 12 ineligible employees (8 percent) out of a total of 152 FECA cases filed with the DOL OWCP from September 1, 2016, to October 31, 2021. In addition, we identified missing required medical documentation for nine (18 percent) of the 51 FECA cases that received compensation benefits for the Department of Labor 2021 chargeback year (July 1, 2020, to June 30, 2021). These issues occurred because GPO's workers' compensation office has outdated and/or inadequate policies and procedures to ensure controls are in place for conducting oversight of COP and review of FECA cases. As a result, GPO improperly paid 12 ineligible employees COP benefits, totaling \$51,332 in questioned costs. In addition, without a systematic process for conducting and documenting reviews of its FECA cases, GPO is at risk of missing opportunities to identify inconsistencies over the life of a case for continued eligibility. Lastly, we believe increased controls and documentation of reviews could help improve confidence in the data used to pay COP and reimburse the Department of Labor (DOL) annually through the chargeback process for benefits paid under FECA.

What We Recommended

Our report contains three recommendations designed to strengthen GPO's oversight and management of its Workers' Compensation Program. Specifically, we recommended that GPO remedy improper continuation of pay benefits totaling \$25,111 to six ineligible employees; establish standard operating procedures for employees accountable for its Workers' Compensation Program; and update GPO Directive 665.5B.

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INTRODUCTION

Objective

This report presents the results of our self-initiated audit of payments to injured employees at GPO (Project Number A-2021-002). Our objective was to determine whether GPO is properly paying employees who have sustained work-related injuries or disease covered by the Federal Employees' Compensation Act (FECA). See Appendix A for additional information about this audit.

Background

GPO employees are covered by the FECA. Enacted in 1916,¹ FECA provides workers' compensation benefits for federal civilian employees who have sustained work-related injuries or disease. The U.S. Department of Labor (DOL), Office of Workers' Compensation Programs (OWCP) administers FECA and adjudicates the injured employee's eligibility for benefits. The DOL OWCP uses its Employees' Compensation Funds² to pay the claimants' compensation benefits and/or medical expenses on behalf of the employing agency for approved claims. The employing agencies reimburse the DOL OWCP annually through a chargeback report process. The chargeback year covers the period of July 1 of the previous year through June 30 of the current year.

In 1974,³ Congress amended the FECA by adding the continuation of pay (COP) provision requiring the employing agencies, and not the DOL OWCP, to pay eligible employees their regular pay for up to 45 calendar days of wage loss. The intent of COP is to avoid interruption of the employee's income while the case is being adjudicated by the DOL OWCP.

As part of the Human Capital business unit at GPO, the Workers' Compensation Office (WCO) has broad responsibility for the GPO Workers' Compensation Program. This includes establishing policies, procedures, and guidelines. The WCO is responsible for providing claims assistance, managing cases including evaluating claims for COP eligibility and monitoring long-term cases for continued eligibility. Further, the WCO identifies reemployment opportunities to assist GPO in returning injured employees to work when possible.

¹ Public Law 64-267.

² 5 U.S. Code §8147.

³ 5 U.S. Code §8118.

AUDIT RESULTS

Finding 1. Oversight and Management of COP and Case Review under FECA.

In general, GPO was properly paying employees who have sustained work-related injuries or diseases covered by FECA. However, opportunities exist for GPO to improve its oversight and management of COP and review of its FECA cases. Specifically, we found that GPO paid COP benefits to 12 ineligible employees (8 percent) out of a total of 152 FECA cases filed with the DOL OWCP from September 1, 2016, to October 31, 2021. In addition, we identified missing required medical documentation for nine (18 percent) of the 51 FECA cases that received compensation benefits for the DOL 2021 chargeback year (July 1, 2020, to June 30, 2021). These issues occurred because the WCO has outdated and/or inadequate policies and procedures to ensure controls are in place for conducting oversight of COP and review of FECA cases. As a result, GPO improperly paid 12 ineligible employees COP benefits, totaling \$51,332 in questioned costs. In addition, without a systematic process for conducting and documenting reviews of its FECA cases, GPO is at risk of missing opportunities to identify inconsistencies over the life of a case for continued eligibility. Lastly, we believe increased controls and documentation of reviews could help improve confidence in the data used to pay COP and reimburse the DOL annually through the chargeback process for benefits paid under FECA.

Continuation of Pay

From September 1, 2016, to October 31, 2021, GPO paid 16,997 hours of COP benefits for 152 FECA cases filed with the DOL OWCP. We analyzed all 152 FECA cases and found that for 12 cases (8 percent), GPO improperly paid \$51,332 to 12 employees who were not eligible to receive COP benefits. Specifically, GPO paid COP benefits for five cases that did not meet COP eligibility requirements. For another five cases, GPO overpaid COP benefits by not reverting COP payments when DOL denied said cases. For the remaining two cases, GPO paid the COP benefits even though the cases did not meet COP eligibility requirements and were subsequently denied by DOL. See the improper payments on [Table 1](#) below.

Table 1. Improperly Paid COP

Case Number	Did Not Meet COP Eligibility Requirements	Case Denied by DOL	Hours	Hourly Rate	Amount Paid
1	√	√	16	\$24.25	\$388.00
2	√		12	\$44.06	\$528.72
3	√		8	\$25.21	\$201.68
4	√		8	\$25.94	\$207.52
5		√	16	\$28.82	\$461.12
6		√	264	\$25.52	\$6,737.28
7	√	√	44	\$39.12	\$1,721.28
8		√	256	\$40.88	\$10,465.28
9	√		248	\$44.91	\$11,137.68
10	√		3	\$45.29	\$135.87
11		√	240	\$30.22	\$7,252.80
12		√	248	\$48.77	\$12,094.96
Total			1,363		\$51,332.19

Source: OIG Analysis

Under the FECA, injured employees that meet certain requirements are eligible for COP benefits for up to 45 calendar days. To be eligible, an employee must meet all of the following requirements:⁴

- Sustain a work-related traumatic injury;⁵
- Timely report the injury to the employing agency within 30 days from the date of injury;
- Begin losing time from work due to the injury within 45 days from the date of injury; and,
- Present medical evidence to support the injury to the employing agency within 10 calendar days after filing a claim.

According to WCO employees, in order to claim COP for a work-related incident at GPO, the employee or their designee reports the incident to the WCO and files a claim in the DOL

⁴ 20 CFR § 10.205 and 20 C.F.R. §10.210(b).

⁵ Traumatic injury for purposes of FECA is defined in 20 C.F.R. §10.5(ee) as a wound or other condition of the body caused by external force, including stress or strain. The injury must be identifiable by time and place or occurrence and member of the body affected. It must be caused by a specific event or incident or series of events or incidents within a single day or work shift.

employees' compensation operations and management portal⁶ (DOL portal). WCO employees review the incident for COP eligibility. If WCO employees determine that the employee meets the COP eligibility requirements, they will notify the employee's supervisor and the Office of Finance (Finance) authorizing the use of COP benefits. WCO employees added that beginning in September 2017, following the WCO notification, Finance will activate the administrative account, Code 67 – OWCP Injury Leave, in the GPO's time and attendance (T&A) system⁷ for up to 45 days. The injured employee or their designee will use Code 67 to request COP leave in the T&A system for their supervisor to approve time missed from work due to the work-related injury as shown in [Figure 1](#).

Figure 1. COP Process at GPO



The intent of COP under FECA is to avoid interruption of the employee's income while the case is being adjudicated by the DOL OWCP. If a claim is ultimately denied by the DOL OWCP, any previously paid COP benefits should be reverted and charged to the employee's leave balance. If the employee does not have a sufficient leave balance, the previously paid COP benefits are reclassified to leave-without-pay and deemed an overpayment, and are subject to repayment by the employee.

According to WCO employees, they rely on the employee's supervisor and Finance to ensure that COP benefits are only provided to the injured employee within the authorized period. In addition, WCO employees asserted that they do not conduct any follow-up on COP pay and do not have access to the T&A system to monitor COP usage. When we informed WCO employees that Finance sends bi-weekly T&A reports with detailed timesheet activities to the Chief Human Capital Officer, they asserted that they were not aware of said reports. Based on the detailed information in the bi-weekly T&A reports, we believe WCO employees can monitor COP usage by employees and take timely corrective actions when appropriate.

Based on our audit, the WCO began remedial actions to recover the improper payments. As of February 2023, the WCO in coordination with Finance reverted \$26,221 in COP benefits for cases 6, 10,11, and 12 from four employees and charged their hours to accrued leave or leave without pay. For the remaining eight cases totaling \$25,111, WCO has not completed remedial actions through the date of this report.

⁶ The DOL portal is a website hosted by the DOL OWCP that provides federal agencies with an electronic system for recording workplace injuries and illnesses, and processing claims under FECA.

⁷ The official record of time and attendance for all GPO employees, including leave balances.

FECA Case Review

We judgmentally selected 51 cases that received compensation benefits for the DOL 2021 chargeback year (July 2020 through June 2021) and reviewed documentations maintained in the DOL portal for calendar years 2018 to 2021. We found nine (18 percent) of the 51 cases were missing required medical documentation to support continued eligibility as shown in [Table 2](#) below.

Table 2. Required Medical Documentation

Case Number	Medical Document Requirement	2021	2020	2019	2018
1	Biennial	x	x	x	✓
2	Annual	✓	✓	✓	x
3	Annual	x	✓	✓	✓
4	Biennial	x	x	x	x
5	Annual	✓	x	✓	✓
6	Annual	x	✓	✓	✓
7	Annual	✓	x	✓	✓
8	Annual	✓	x	✓	x
9	Annual	✓	✓	x	x

x Missing ✓ Not missing

Source: OIG Analysis

In all nine cases identified in Table 2, the injured employees were on the DOL OWCP's periodic roll (PR). According to the DOL's procedure manual,⁸ PR is an efficient method of ensuring regular payment of compensation to those with long-term compensable disabilities. When medical evidence indicates that the temporary total disability is expected to continue for more than 60-90 days, compensation is usually paid on a PR. Once on the PR, the frequency in which medical evidence is required may vary. For example,

- For case status PR, medical evidence is required at least once a year.
- For case status PW,⁹ medical evidence is required every two years.
- For case status PN,¹⁰ medical evidence is required every three years.

In response to our inquiry, WCO employees could not explain why the medical evidence necessary to support the continuation of benefits was missing. In addition, WCO employees acknowledged that they do not document their reviews. We also noted that there was no standard level of review. Therefore, the types of reviews conducted by each WCO employee vary. For example, WCO employees informed us that they prioritize their case reviews to newer cases and review older cases as needed, as well as when they receive DOL chargeback reports. One WCO employee stated that they used their inbox to set up

⁸ Division of Federal Employees' Compensation Procedure Manual, [DFEC Chapter 2-0812](#), *Periodic Review of Disability Cases*.

⁹ PW: Compensation payment at a reduced rate, reflecting partial wage-earning capacity or actual earnings.

¹⁰ PN: Payment on periodic roll, formally determined to have no wage earning-capacity or re-employment potential for indefinite future.

reminders for follow-up items with the DOL OWCP. The same WCO employee asserted that they look for items that strike them as odd or red flags, such as high compensation but no medical payments, when they receive the chargeback report. This WCO employee added that they review the oldest cases for any missing medical reports. Another WCO employee stated that they review cases for updated medical and earning documents when they receive the DOL chargeback report. The WCO employee added that, however, they never finish reviewing the entire chargeback report. Finally, WCO employees also stated that GPO is limited in the action that it can take to address missing required documentation. We recognized that DOL is responsible for the administration of medical evidence. However, it is prudent for GPO to have a consistent and standard process for reviewing its case files for reporting any issues to DOL for appropriate actions.

Why Did It Occur

While GPO Directive 665.5B, *Workers' Compensation Program*, describes the responsibilities of the WCO, it does not identify how they are to be accomplished. Directive 665.5B assigns the WCO with the responsibility for program administration, management, and operations. This includes establishing policies, procedures, and guidelines that ensure effective and efficient management of the Workers' Compensation Program. Inherent in the management of a program is monitoring controls and activities. However, Directive 665.5B has not been updated since September 2008 and is not in compliance with GPO Directive 001.1D,¹¹ which requires all active GPO Directives to be reviewed for applicability by the Directive's originating office at least once every four years. In 2019, the WCO issued several standard operating procedures memos, however, they lacked clear roles and responsibilities and standardization for the day-to-day management of workers' compensation cases.

We recognized that the DOL OWCP is responsible for administering and adjudicating the injured employee's eligibility for benefits under FECA. We also recognize that GPO has flexibility in how they establish and implement the Workers' Compensation Program. It's important for GPO to strike the right balance between relying on institutional knowledge and standardizing processes to improve productivity, efficiency, and effectiveness. Without a systematic process for conducting and documenting reviews of its FECA cases, GPO is at risk of missing opportunities to identify inconsistencies over the life of a case for continued eligibility. Lastly, we believe increased controls and documentation of reviews could help improve confidence in the data used to pay COP and reimburse the DOL annually through the chargeback process for benefits paid under FECA.

¹¹ GPO Directive System, dated January 25, 2022

Recommendations for the Director:

Recommendation 1: Take appropriate actions to remedy the remaining improper payments of \$25,111 identified in this audit.

Recommendation 2: Develop and implement written standard operating procedures to include but not limited to establishing clear roles and responsibilities for employees who are accountable for the Workers' Compensation Program to:

1. Ensure only eligible claimants receive continuation of pay benefits and any previously provisioned continuation of pay is rescinded when the Federal Employees' Compensation Act claim is formally denied by the Department of Labor.
2. Monitor and track all workers' compensation-related activities recorded in the Government Publishing Office time and attendance system and take timely actions to remedy ineligible activities under Federal Employees' Compensation Act.
3. Standardize processes to provide a consistent approach for conducting and documenting case reviews.

Recommendation 3: Review and update Government Publishing Office Directive 665.5B in compliance with Government Publishing Office Directive 001.D.

MANAGEMENT'S COMMENTS

Management agreed with the finding and all recommendations. See [Appendix D](#) for management's comments in their entirety.

Regarding recommendation 1, management stated that remedial actions to recover payments have begun and will continue for the remaining cases where the payee is still employed with the agency. In cases where the employee is no longer with the Agency, management stated they will not pursue repayment. The target implementation date is September 30, 2023.

Regarding recommendation 2, management stated they will develop and implement new standard operating procedures to establish clear roles and responsibilities throughout the case lifecycle. The target implementation date is September 30, 2023.

Regarding recommendation 3, management stated they will promulgate an updated Directive 665.5B that complies with GPO Directive 001.D and take into consideration the totality of the recommendation in the report. The target implementation date is July 31, 2023.

EVALUATION OF MANAGEMENT'S COMMENTS

The OIG considers management's comments responsive to recommendations 1 through 3 and corrective actions taken and planned should resolve the issues identified in the report. All recommendations require OIG concurrence before closure. The OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed until the OIG provides written confirmation that the recommendations can be closed.

APPENDICES

Appendix A. Objective, Scope, and Methodology

Our objective was to determine whether GPO is properly paying employees who have sustained work-related injuries or disease covered by FECA.

To accomplish our audit, we:

- Reviewed applicable sections of the FECA and policies and procedures promulgated by GPO's Workers' Compensation Office.
- Reviewed payment information in case documentation in the DOL portal.
- Conducted walkthroughs to evaluate processes and procedures GPO officials used to manage workers' compensation.
- Held discussions with applicable key personnel involved with the management of the workers' compensation program at GPO.
- Reviewed GPO's 2017 to 2021 DOL Chargeback Reports
- Reviewed and discussed each case exception with GPO officials.

We selected and reviewed 152 FECA cases associated with 116 employees that charged COP hours from September 1, 2016, through October 31, 2021, in GPO's time and attendance system. We also judgmentally selected and reviewed 51 out of 138 FECA cases found on GPO's 2021 Chargeback Report. The judgmental selection of the 51 case files excluded cases that did not have compensation, denied cases, cases involving OIG employees, and case statuses that indicated no potential for re-employment. For all 51 sample cases, we reviewed case files in the DOL portal.

We conducted this performance audit from September 2021 through June 2023,¹² in accordance with generally accepted government auditing standards, and included such tests of internal controls as we considered necessary under the circumstances. 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. We discussed our observations and conclusions with management on April 27, 2023, and considered their comments where appropriate.

Internal Controls

We assessed internal controls and compliance with laws and regulations necessary to satisfy audit objectives.

¹² We suspended the audit pending access to the DOL portal from January to May 2022.

Computer-Generated Data

We assessed the reliability of time and attendance data in the T&A system by tracing them to source and supporting documentation and discussing and verifying the data with knowledgeable management officials. We determined that the data were sufficiently reliable for the purposes of this report.

Prior OIG Coverage

The OIG did not identify any prior audits, inspections, or investigations related to the objective of this audit within the last five years.

Appendix B. Table of Recommendations

Recommendation	Management Response	Status	Return on Investment
Director, GPO			
1. Take appropriate actions to remedy the remaining improper payments of \$25,111 identified in this audit.	Concur. Target Implementation Date (TID) September 30, 2023.	Open	Monetary impact. <i>By taking remedial actions, GPO will be correcting an overpayment.</i>
2. Develop and implement written standard operating procedures to include but not limited to establishing clear roles and responsibilities for employees who are responsible for the Workers' Compensation Program to: <ol style="list-style-type: none"> 1. Ensure only eligible claimants receive continuation of pay benefits and any previously provisioned continuation of pay are properly rescinded when the FECA claim is formally denied by DOL. 2. Monitor and track all workers' compensation-related activities recorded in the GPO's time and attendance system and take timely actions to remedy ineligible activities under FECA. 3. Standardize processes to provide a consistent approach for conducting and documenting case reviews. 	Concur. TID September 30, 2023.	Open	Nonmonetary - Improve management controls and processes. <i>By developing and implementing written standard operating procedures, it will provide consistency and standardization to improve overall program oversight. In addition, it can help improve confidence in the data used to pay COP and reimburse the DOL annually through the chargeback process for benefits paid under FECA.</i>
3. Review and update GPO Directive 665.5B in compliance with GPO Directive 001.D	Concur. TID July 31, 2023.	Open	Nonmonetary - Improve management controls and processes. <i>Performing periodic reviews of existing directives will ensure continuing</i>

Recommendation	Management Response	Status	Return on Investment
			<i>applicability and provide an opportunity to update standardized processes to improve productivity, efficiency, and effectiveness.</i>

Appendix C. Abbreviations

COP	Continuation of Pay
CFR	Code of Federal Regulations
DOL	Department of Labor
FECA	Federal Employees' Compensation Act
GPO	U.S. Government Publishing Office
OIG	Office of the Inspector General
OWCP	Office of Workers' Compensation Program
PR	Periodic Roll
T&A	Time and Attendance
WCO	Workers' Compensation Office

Appendix D. Management's Comments

MEMORANDUM

Date: May 24, 2023
To: Inspector General
Subject: Agency Response to the OIG Draft Audit Report on Payments to Employees Covered by Federal Employee Compensation Act (FECA)

Thank you for the opportunity to offer the Agency's response to the Draft Audit Report on Payments to Employees covered by the Federal Employee Compensation Act (FECA).

In General

Human Capital's Workers' Compensation Office (WCO) is responsible for administering the workers' compensation program under the Federal Employee Compensation Act (FECA) for the Agency. WCO serves in a program management role coordinating between multiple responsible parties in each FECA case, to include Agency managers, the U.S. Department of Labor and GPO Finance. In their role, providing claims assistance, guidance, oversight and follow-up are critical.

Agency Response to Recommendations in the Draft Report

Recommendation 1

Take appropriate actions to remedy the remaining improper payments of \$25,111 identified in this audit.

GPO concurs with this recommendation.

WCO, in close coordination with Finance, has begun remedial actions to recover improper payments in accordance with GPO Directive 445.20. WCO will continue this partnership with Finance to remediate the remaining cases where the payee is still employed with the Agency. In those cases where the employee is no longer with the Agency, we will not pursue repayment due to the inherent difficulty involved.

The Agency expects to complete the review and collection process by the end of this fiscal year (FY23).

Recommendation 2

Develop and implement written standard operating procedures to include but not limited to establishing clear roles and responsibilities for employees who are responsible for the Workers' Compensation Program to:

- 1. Ensure only eligible claimants receive continuation of pay benefits and any previously provisioned continuation of pay are properly rescinded when the FECA claim is formally denied by DOL.*

MEMORANDUM

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2. *Monitor and track all workers' compensation-related activities recorded in the GPO's time and attendance system and take timely actions to remedy ineligible activities under FECA.*
3. *Standardize processes to provide a consistent approach for conducting and documenting case reviews.*

GPO concurs with this recommendation.

Human Capital will develop and implement new SOPs to establish clear roles and responsibilities throughout the case lifecycle. This will enable improved transparency and efficiency in program management as well as ensuring greater understanding of roles and decision-making authority from all parties involved in the program. Human Capital will accomplish this recommendation in coordination with Recommendation 3.

The Agency expects to complete the development and implementation of new FECA SOPs by September 30, 2023.

Recommendation 3

Review and update GPO Directive 665.5B in compliance with GPO Directive 001.D

GPO concurs with this recommendation.

The Human Capital team has already begun work on this recommendation and will promulgate an updated Directive 665.5B that is in compliance with GPO Directive 001.D and takes into consideration the totality of the recommendations in this report.

The Agency expects to complete the updated Directive by July 31, 2023.

Thank you for the opportunity to provide the Agency's input on this product from your office. The Agency spent approximately 4 hours preparing this response. If you have any questions, please contact me.



HUGH NATHANIAL HALPERN

**cc: Deputy Director
Chief of Staff
General Counsel**