United States General Accounting Office

GAO

Report to the Chairman, Committee on Government Reform, House of Representatives

July 2003

HUMAN CAPITAL

Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts

G A O
Accountability ★ Integrity ★ Reliability

G A O
Accountability·Integrity·Reliability

Highlights

HUMAN CAPITAL

Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts

Why GAO Did This Study

Telework—work done at a location other than a traditional office—has gained widespread attention over the past decade as a human capital flexibility offering various potential benefits to employers, employees, and society. Using such flexibilities as management tools can help the federal government address its human capital challenges. GAO did this study in response to a congressional request to assess the federal government's progress in implementing telework programs and to determine what else can be done to give federal employees the ability to telework under appropriate circumstances.

What GAO Recommends

GAO makes recommendations to the Director, OPM, and the Administrator, GSA, regarding further guidance and assistance they can provide to executive agencies in implementing telework programs. In joint comments, the administrator and director generally agreed with our recommendations and committed to taking steps towards their implementation. Both agencies disagreed with several findings on both their governmentwide and internal telework efforts. Comments from the Secretary, VA, and Director, Human Resources Services, Education, also generally agreed with our report, but VA disagreed with several findings. Our characterizations were generally accurate, but we made changes in response to agencies' comments, as appropriate.

www.gao.gov/cgi-bin/getrpt?GAO-03-679.

To view the full report, including the scope and methodology, click on the link above. For more information, contact J. Christopher Mihm at (202) 512-6806 or mihmj@gao.gov.

What GAO Found

The statutory framework for federal telework requires agencies to take certain actions related to telework, provides agencies with tools for supporting telework, and provides both the Office of Personnel Management (OPM) and the General Services Administration (GSA) with lead roles and shared responsibilities for the federal telework initiative. Both agencies offer services and resources to support and encourage telework in the federal government. However, these agencies have not fully coordinated their telework efforts and have had difficulty in resolving their conflicting views on telework-related matters. As a consequence, agencies have not received consistent, inclusive, unambiguous support and guidance related to telework.

After we discussed the issues created by the lack of coordination between GSA and OPM with both agencies, a GSA official then indicated that GSA and OPM expressed a new commitment to coordination. Such a commitment reflects a promising start for better assisting federal agencies in improved implementation of their telework programs. However, the key to success will be sustained efforts by both agencies to work together in assisting agencies and providing consistent and straightforward guidance, services, and resources on the governmentwide telework initiative.

GAO identified 25 key practices in telework-related literature and guidelines as those that federal agencies should implement in developing telework programs and grouped these practices under seven categories. While the four selected executive agencies we reviewed—the Department of Education (Education), GSA, OPM, and the Department of Veterans Affairs (VA)—have taken at least some steps to implement most of the key practices, only 7 of the 25 key practices, such as establishing a cross-functional project team and establishing an agencywide telework policy, had been fully implemented by all four agencies.

Although some telework-related resources from GSA and OPM provide federal agencies with information on how to implement several of the key practices we identified, agencies may need additional guidance, guidelines, and/or individualized technical support to fully implement these practices.

Contents

Table

Figures

Abbreviations

CFO	Chief Financial Officers
DOE	Department of Energy
DOI	Department of the Interior
EIRO	E-Connected Intelligent Remote Operations
EPA	Environmental Protection Agency
GSA	General Services Administration
IT	information technology
ITAC	International Telework Association and Council
OPM	Office of Personnel Management
MSPB	U.S. Merit Systems Protection Board
VA	Department of Veterans Affairs

G A O

Accountability ★ Integrity ★ Reliability

United States General Accounting Office
Washington, D.C. 20548

July 18, 2003

The Honorable Tom Davis, Chairman
Committee on Government Reform
House of Representatives

Dear Mr. Chairman:

Telework, also referred to as telecommuting or flexiplace, has gained widespread attention over the past decade in both the public and private sectors as a human capital flexibility that offers a variety of potential benefits to employers, employees, and society.[1,2] The term telework refers to work that is performed at an employee's home or at a work location other than a traditional office. Using such readily available flexibilities as management tools is critical to addressing the federal government's human capital challenges. In the Office of Personnel Management's (OPM) 2003 report to Congress on the status of telework in the federal government, the Director of OPM described telework as "an invaluable management tool which not only allows employees greater flexibility to balance their personal and professional duties, but also allows both management and employees to cope with the uncertainties of potential disruptions in the workplace, including terrorist threats."[3]

This report is in response to your request that we assess various aspects of the progress federal agencies have made in implementing telecommuting initiatives. In this regard, and as agreed with your staff, the objectives of this report were to (1) characterize the federal laws and their requirements that currently apply to telecommuting within the federal agencies in the executive branch, (2) determine what the General Services Administration (GSA) and OPM are doing, as lead agencies, to coordinate and promote telecommuting in the federal government, (3) determine the extent to

---

[1]Throughout this report, the terms telework, telecommuting, and flexiplace are used interchangeably.

[2]For more information on telework in the federal government, see U.S. General Accounting Office, *Federal Workforce: Agencies' Policies and Views on Flexiplace in the Federal Government*, GAO/GGD-97-116 (Washington, D.C.: July 3, 1997) and *Telecommuting: Overview of Challenges Facing Federal Agencies*, GAO-01-1116T (Washington, D.C.: Sept. 6, 2001).

[3]U.S. Office of Personnel Management, *Report to the Congress: The Status of Telework in the Federal Government* (Washington, D.C.: Jan. 2003).

which selected federal agencies are implementing key practices in developing telecommuting programs, and (4) identify additional governmentwide actions that could be taken to encourage federal agencies to increase telecommuting participation.

We took several steps to address these objectives. In order to characterize the federal laws and their requirements that currently apply to telecommuting within the federal agencies in the executive branch, we identified and analyzed the relevant laws and discussed the requirements of selected laws with agency officials. To determine what GSA and OPM are doing to coordinate and promote telecommuting in the federal government, we interviewed GSA and OPM officials regarding their governmentwide telework efforts and analyzed documents related to these efforts. We determined the extent to which selected federal agencies are implementing key practices in developing telecommuting programs by first conducting a review of literature and guidelines to identify these practices. Then, we interviewed agency officials and analyzed documents related to telework implementation at four agencies—the Department of Education (Education), the Department of Veterans Affairs (VA), GSA, and OPM. These agencies were selected for various reasons, including function, size, and reported level of telework participation.[4] This agency selection process was not designed to produce findings that could be considered representative of telework implementation in the federal government as a whole, but rather to provide illustrative examples of the extent to which selected individual agencies had used the key practices identified in our literature review. To identify additional governmentwide actions that could be taken to encourage federal agencies to increase telecommuting participation, we interviewed officials and union representatives from the four selected agencies, as well as other unions representing federal employees. Our review was conducted in accordance with generally accepted government auditing standards. (See app. I for additional information on our scope and methodology.)

---

[4]Size and level of telework participation were determined from survey data collected by OPM for its January 2002 report to Congress, entitled *The Status of Telework in the Federal Government*.

Results in Brief

A statutory framework including legislation on a wide range of issues related to telework began to emerge from Congress in 1990. Within this statutory framework, there are provisions that require agencies to take certain actions related to telework, provide agencies with tools for supporting telework, and provide both GSA and OPM with lead roles in the implementation of telework in the federal government. The most significant congressional action related to telework was the enactment of Sec. 359 of Pub. L. No. 106-346 in October 2000, which provides the current mandate for telework in the executive branch of the federal government by requiring each executive agency to establish a policy under which eligible employees may participate in telework.[5] OPM issued guidance to agencies in 2001 related to the implementation of this law. However, until recently, OPM had not defined a statement contained in that guidance which told agencies that eligible employees who wanted to telework must be allowed that opportunity. Without such a definition, we found that the agencies we reviewed did not use equivalent interpretations of this statement, resulting in their reporting incomparable data to OPM. These data were subsequently included in OPM's 2003 report to Congress on the status of telework in the federal government. After we discussed this issue with OPM officials, OPM reacted promptly by issuing new telework guidelines that defined what it meant by allowing this opportunity. If this new definition is properly applied by all agencies in reporting data to OPM, this should address the issue we found.

As lead agencies for the governmentwide telework initiative, both GSA and OPM offer services and resources to support and encourage telework in the federal government. Some of the services and resources are offered jointly by both GSA and OPM, while others are offered individually by both agencies or uniquely by either GSA or OPM. Although GSA and OPM share responsibilities for the governmentwide telework initiative and a GSA official recently indicated that GSA and OPM have expressed a new commitment to working together, their past efforts were not well coordinated. For example, a GSA official told us that agencies had expressed concern about conflicting messages they had received from GSA and OPM on several topics, including dependent care and emergency government office closings. With regard to dependent care, officials from both GSA and OPM confirmed that they had different positions on this

---

[5]Section 359 of Pub. L. No. 106-346, October 23, 2000. Hereafter, this section of the law will be referred to as Pub. L. No. 106-346.

GAO-03-679 Improving Federal Telework Efforts

issue. GSA's position is that employees can care for dependents when teleworking, as long as it does not interfere with accomplishing tasks, while OPM's position was, until recently, that dependents should not be in the home when an employee is teleworking. After we discussed these conflicting messages with OPM officials, OPM revised its position on this issue in the new telework guidelines it released shortly thereafter. These guidelines state that while teleworkers should not generally be engaged in caregiving activities when working at home, teenagers or elderly dependents might be at home when the employee is teleworking, as long as those dependents are independently pursuing their own activities. Because such lack of coordination can create confusion for agencies and employees, we are recommending that the Administrator, GSA, and the Director, OPM, ensure that their offices with responsibilities for the governmentwide telework initiative better coordinate efforts to provide federal agencies with consistent, inclusive, unambiguous support and guidance related to telework.

We identified 25 key practices in telework-related literature and guidelines that federal agencies should implement in developing successful telework programs. For purposes of analysis, we grouped these practices under seven categories. (See fig. 1.)

Figure 1: Key Telework Practices for Implementation of Successful Federal Telework Programs

Program planning
- Designate a telework coordinator.
- Establish a cross-functional project team, including, for example, information technology (IT), union representatives, and other stakeholders.
- Establish measurable telework program goals.
- Develop an implementation plan for the telework program.
- Develop a business case for implementing a telework program.
- Provide funding to meet the needs of the telework program.
- Establish a pilot program.

Telework policy
- Establish an agencywide telework policy.
- Establish eligibility criteria to ensure that teleworkers are selected on an equitable basis using criteria such as suitability of tasks and employee performance.
- Establish policies or requirements to facilitate communication among teleworkers, managers, and coworkers.
- Develop a telework agreement for use between teleworkers and their managers.
- Develop guidelines on workplace health and safety issues to ensure that teleworkers have safe and adequate places to work off-site.

Performance management
- Ensure that the same performance standards, derived from a modern, effective, credible, and validated performance system, are used to evaluate both teleworkers and nonteleworkers.
- Establish guidelines to minimize adverse impact on nonteleworkers before employees begin to work at alternate worksites.

Managerial support
- Obtain support from top management for a telework program.
- Address managerial resistance to telework.

Training and publicizing
- Train all involved, including, at a minimum, managers and teleworkers.
- Inform workforce about the telework program.

Technology
- Conduct assessment of teleworker and organization technology needs.
- Develop guidelines about whether organization or employee will provide necessary technology, equipment, and supplies for telework.
- Provide technical support for teleworkers.
- Address access and security issues related to telework.
- Establish standards for equipment in the telework environment.

Program evaluation
- Establish processes, procedures, and/or a tracking system to collect data to evaluate the telework program.
- Identify problems and/or issues with the telework program and make appropriate adjustments.

Source: GAO analysis of telework-related literature and guidelines.

While all four agencies we reviewed have taken at least some steps to implement most of the key practices, many practices remain in need of attention. Seven of the key practices, such as establishing a cross-functional project team and establishing an agencywide telework policy, had been fully implemented by all four agencies. However, in each of the categories, there were practices that some or all of the agencies had not implemented or had only partially implemented. For example, none of the agencies reviewed have established measurable program goals or fully implemented the practice of training all involved. To enable agencies to more effectively implement these practices, we are recommending that GSA and OPM use their lead roles in the federal telework initiative to assist executive agencies in implementing the key telework practices.

In addition to the key practices we identified as being integral to developing successful federal telework programs, we asked agency and union officials from the four agencies we reviewed to identify governmentwide actions that could be taken to encourage federal agencies to increase telework participation. Some of the actions they identified are closely related to the key practices we identified, such as the need for funding of telework programs, the need for training, and the importance of obtaining top-level support for telework. Several officials also commented on the need for clarification regarding the implementation of the telework provisions in Pub. L. No. 106-346.

We provided a draft of this report in June 2003 to the Secretaries of Education and VA, the Administrator, GSA, and the Director, OPM. The Director of Human Resources Services from Education provided comments via e-mail (see app. III for a summary of these comments). In addition, we received written comments from the Secretary, VA, and joint written comments from the Administrator, GSA, and the Director, OPM, in response to a draft of this report (see app. IV and V). Where appropriate, we made changes in our report in response to these comments.

Education generally agreed with the contents of the draft report and stated that the department was pleased that we recognized its efforts to advance telework. VA agreed with our conclusion that there is a need for further guidance and assistance from GSA and OPM regarding federal telework implementation and suggested two areas where such guidance would be helpful. VA disagreed with several of our findings related to the status of VA's implementation of the telework practices we identified. However, when we asked for documentation to support the statements that VA made in its comments, VA was unable to provide such information. Absent any

evidence that would support VA's comments, our assessment remains unchanged.

In their combined comments, GSA and OPM agreed to implement our recommendation that they use their lead roles in the federal telework initiative to assist agencies in implementing the key telework practices we identified. In addition, GSA agreed with our recommendation that it work with Congress to determine what was meant by the phrase "GSA telecommunication center" in Section 314, Division F, title III of Pub. L. No. 108-7 and whether this provision is in conflict with the provision contained in 40 U.S.C. 587(d)(2). GSA stated that it will coordinate internally and with the appropriate congressional committees to resolve the conflicting language in the statutes and then provide clarification to its customer agencies. On the other hand, both GSA and OPM disagreed with several of our findings relating to their lead roles in the governmentwide telework initiative. For example, GSA and OPM strongly disagreed with our finding that they have not fully coordinated their governmentwide telework efforts in the past. This contradicts information that was conveyed to us by agency officials during our review. However, we have added to the report, where appropriate, to reflect the agencies' new position on the issue of coordination. GSA and OPM also said in their comments that they have recognized the need to better outline separate and shared responsibilities and that a Memorandum of Understanding was among the options they were considering to clearly designate each agency's responsibilities.

OPM also raised a number of issues with our analysis of its internal telework program. In its comments, OPM stated "[E]ach comment listed was conveyed to GAO during the interview process." On the contrary, OPM's written comments, for the most part, contain new information and/or information that does not correspond with what was conveyed to us by OPM officials during our review. Much of this information contradicts what was conveyed to us by agency officials during our review. However, we have revised the report where appropriate to reflect OPM's new positions on some issues. While GSA did not disagree with our findings pertaining to its internal telework program, the agency did note several areas where it would like us to revise statements relative to its implementation of the key practices we identified. We considered these comments and incorporated new language into the report where appropriate.

Background

Over the last decade, telework has emerged as a management tool in the federal government. Congress and the executive branch have shown interest in telework, primarily based upon the belief that its use will benefit the federal government. Benefits of telework include reducing traffic congestion and pollution, improving recruitment and retention of employees, increasing productivity, and reducing the need for office space. Employees also can realize benefits from teleworking, including reduced commuting time; lowered costs in areas such as transportation, parking, food, and wardrobe; removal of barriers for those with disabilities who want to be part of the workforce; and improvement in the quality of worklife and morale accruing from the opportunity to better balance work and family demands. Guidance issued by the Federal Emergency Management Agency,[6] along with telework-related literature, also suggests that telework programs can facilitate emergency preparedness by helping agencies to maintain continuity of operations in emergency situations, thereby increasing agencies' effectiveness. In light of the uncertainties facing the United States today, telework can be a particularly relevant and useful tool.

The importance of telework to federal employees has been highlighted in recent studies. Based on its 2000 Merit Principles Survey, the U.S. Merit Systems Protection Board (MSPB) reported that, of all the family-friendly programs studied, telework showed the greatest disparity between importance and availability, potentially making it the most desired but least available family-friendly program. In addition, the MSPB said that, of all the work-life programs it asked about in the survey, only telework appeared to have a relationship to employees' intentions regarding leaving their employment in the coming year, with those who considered telework important being more likely to plan to leave when it is not available (55 percent) than when it is available (44 percent).[7] According to OPM's 2002 Federal Human Capital Survey, almost 74 percent of federal employee respondents said that telework was at least somewhat important to them.

---

[6]The Federal Emergency Management Agency has recently become part of the new Department of Homeland Security under the department's Emergency Preparedness and Response Directorate.

[7]U.S. Merit Systems Protection Board, *Issues of Merit* (Washington, D.C.: Dec. 2000), 4.

Despite this level of importance, more than 59 percent of the respondents reported that this flexibility was not available to them.[8]

Since 1990, Congress has supported the telework initiative by holding hearings and passing a number of laws related to telework, including laws that provided for the establishment and funding of the GSA telework centers.[9] Most significant was the Department of Transportation and Related Agencies Appropriations Act, 2001, Pub. L. No. 106-346, October 23, 2000. Section 359 of this law provides the current mandate for telework in the executive branch of the federal government. This law, which was to be implemented in 25 percent increments over 4 years, required each federal agency to "establish a policy under which eligible employees of the agency may participate in telecommuting to the maximum extent possible without diminished employee performance" and instructed OPM to provide for the law's requirements to be met.

Telework has also received significant attention in the executive branch since 1990, when the President's Council on Management Improvement approved plans for the implementation of a governmentwide pilot flexiplace program. In the executive branch, telework has been proposed as a tool to address a number of issues, including establishing a family-friendly workplace, reducing traffic congestion and pollution, and enabling people with disabilities to join the federal workforce. Currently, GSA and OPM share responsibilities for the federal government's telework initiative, providing federal agencies with services and resources related to this initiative. To this end, both GSA and OPM have included strategies, goals, and measures directly related to their efforts to support the governmentwide telework initiative in their fiscal year 2003 annual performance plans and their related strategic plans. For example, GSA's fiscal year 2003 performance plan includes a goal to increase the percentage of federal employees that telework to 5 percent by the end of fiscal year 2003 under its performance goal to increase the number of

---

[8]U.S. Office of Personnel Management, *What do Federal Employees Say: Results from the 2002 Federal Human Capital Survey* (Washington, D.C.: Mar. 2003).

[9]See Pub. L. No. 102-393, October 6, 1992, and Sections 5 and 6 of title V of Pub. L. No. 104-52, November 19, 1995. According to House Report No. 102-618, June 25, 1992, that accompanied Pub. L. No. 102-393, telework centers make alternative office-like environments available to federal employees to perform their office functions at a site closer to their homes. These centers are intended to address traffic congestion issues, as well as to confer other benefits, including reduced government real estate costs and a better work/life balance for federal employees.

agency programs meeting their social and environmental responsibilities in areas of GSA's Office of Governmentwide Policy responsibility.

Also among efforts in the executive branch was the formation of an Interagency Telework Issues Working Group, with participants from 15 federal agencies. GSA and OPM jointly established and led this group, which canvassed agencies to identify policy actions needed to facilitate agency use and expansion of telework. A final report, issued in August 2002, contained a series of recommendations related to such policy actions.[10]

Interest in and implementation of telework programs has also occurred in states and foreign countries. Several states piloted telework programs in state government agencies in the mid- to late 1990s and have since implemented telework in individual agencies or on a statewide basis. For example, in Florida, telework became a permanent option for state employees in October 1998 after two 3-year pilot studies. In Europe, about 6 percent of the workforce was teleworking as of 1999 and, in some countries, the participation rate for telework was higher. Finland, for example, had a telework participation rate of about 17 percent of the workforce in 1999. However, only 4 percent of all teleworkers in European countries worked for government entities.

According to OPM's January 2003 report to Congress on the status of telework in the federal government, 77 executive agencies reported that, as of November 2002, 90,010 of their employees teleworked on either a regular or episodic basis,[11] which is 5 percent of those agencies' 1,806,192 employees.[12] The U.S. Department of Labor reported that, in May 2001, 19.8 million persons, accounting for 15 percent of total employment, usually did some work at home as part of their job. However, only 17 percent of these

---

[10]Interagency Telework Issues Working Group, *Interagency Governmentwide Policy Review on Telework and Telework-Related Issues* (Washington, D.C.: Aug. 2002).

[11]Episodic telework refers to a situation in which a teleworker does not telework on a regularly scheduled basis. This type of arrangement is also referred to by a variety of names, including "ad hoc," "intermittent," "occasional," and "as needed."

[12]U.S. Office of Personnel Management, *Report to the Congress: The Status of Telework in the Federal Government* (Jan. 2003).

workers had a formal arrangement with their employer to be paid for the work they did at home.[13]

Federal Laws and Their Requirements Cover a Gamut of Telework Issues

Legislation related to telework began to emerge from Congress in 1990.[14] Since then, these provisions have typically, but not always, been included in a variety of appropriations acts and have covered a wide range of issues related to telework. The statutory framework for telework includes provisions that require agencies to take certain actions related to telework, provide agencies with tools for supporting telework, and provide both GSA and OPM with lead roles in the implementation of telework in the federal government.

Within this framework, the most significant congressional action was the enactment of Section 359 of Pub. L. No. 106-346 in October 2000, which provides the current mandate for telecommuting in the executive branch of the federal government. This law, for the first time, required each executive branch agency to establish a telework policy "under which eligible employees of the agency may participate in telecommuting to the maximum extent possible without diminished employee performance."[15] It also directed OPM to provide that the law's requirements were applied to 25 percent of the federal workforce by April 2001 and to an additional 25 percent of the federal workforce in each subsequent year, until 2004 when the law is to be applied to 100 percent of the federal workforce. The requirements of this law should also be considered in combination with its conference report and guidance that has been issued by OPM.

---

[13]U.S. Department of Labor, Bureau of Labor Statistics, *Work at Home in 2001*, USDL 02-107 (Washington, D.C.: Mar. 1, 2002), http://www.bls.gov/news.release/homey.nr0.htm (downloaded July 1, 2003). Half of those who usually worked at home were wage and salary workers who took work home on an unpaid basis. Another 30 percent of those who worked at home were self-employed.

[14]Congressional committees have also held hearings on telework. The House Education and the Workforce Committee, Subcommittee on Oversight and Investigations, held a series of hearings in 1999 and 2000 to examine barriers to telework implementation in federal agencies. In 2001, the House Government Reform Committee, Subcommittee on Technology and Procurement Policy, held two hearings to examine the efforts of federal government agencies in creating and promoting telework programs. GAO testified at one of these hearings in September 2001. (See GAO-01-1116T.)

[15]Section 359 of Pub. L. No. 106-346, October 23, 2000.

The conference report accompanying Pub. L. No. 106-346 stated that agencies shall "develop criteria to be used in implementing [a telecommuting] policy" and "ensure that managerial, logistical, organizational, or other barriers to full implementation and successful functioning of the policy are removed."[16] Furthermore, it stated that agencies "should also provide for adequate administrative, human resources, technical, and logistical support for carrying out the policy." It also clarified what constitutes eligibility for telework by defining an eligible employee as "any satisfactorily performing employee of the agency whose job may typically be performed at least one day per week [by telecommuting]."

On February 9, 2001, OPM sent a memorandum to department and agency heads containing guidance on the requirements of Pub. L. No. 106-346 that directed agencies to examine the barriers that inhibit the use of telecommuting, act to remove them, and increase participation. This memorandum went on to say, "The law recognizes that not all positions are appropriate for telecommuting; therefore, each agency must identify positions that are appropriate in a manner that focuses on broad objective criteria. Once an agency has established eligibility criteria, subject to any applicable agency policies or bargaining obligations, employees who meet them and want to participate must be allowed that opportunity if they are satisfactory performers." OPM recently clarified this statement in a publication entitled, *Telework: A Management Priority—A Guide for Managers, Supervisors, and Telework Coordinators*. This guide, which was released on May 8, 2003, indicates that agencies should offer eligible employees the opportunity to telework by having supervisors extend the option of teleworking to all employees they determine are eligible, using established criteria.[17]

---

[16]Section 359 of H.R. Report No. 106-940, October 5, 2000.

[17]U.S. Office of Personnel Management, *Telework: A Management Priority—A Guide for Managers, Supervisors, and Telework Coordinators* (Washington, D.C.: May 2003), 2, 25.

Congress also passed other laws that require agencies to take certain actions related to telework. One such provision requires executive agencies to consider whether needs for additional space can be met using alternative workplace arrangements, such as telework.[18] Another recent provision, contained in the fiscal year 2003 appropriations for the Departments of Commerce, Justice, and State, the Judiciary, and the Small Business Administration, makes $100,000 available to each of the departments and agencies covered by this provision only for the implementation of telecommuting programs. These departments and agencies are required to provide the committees on appropriations with a report on the status of their telecommuting programs every 6 months and to designate a "Telework Coordinator" to oversee the implementation of telecommuting programs.[19]

In addition to these provisions, another provision directs executive agencies to make a minimum of $50,000 available annually for the necessary expenses to carry out telecommuting programs, which would permit employees of 20 specified federal departments and agencies, including Education, GSA, OPM, VA, the Department of the Interior (DOI), and the Department of Energy (DOE), to perform all or a portion of their duties at GSA telework centers.[20] However, a provision has been included in the appropriations acts for DOI and related agencies since fiscal year 2001 prohibiting several departments and agencies, including DOI and DOE, from using appropriated funds for the use of "GSA telecommunication centers."[21] GSA officials believe that the provisions contained in these appropriations laws were intended to apply to GSA telework centers. However, this remains unclear, because these statutes pertain to "GSA telecommunication centers," which is not a title by which the GSA telework centers are known. At least in some instances, though, this provision has not been applied to the telework centers. OPM's January 2003 report to Congress identified two of the agencies prohibited from

---

[18]40 U.S.C. 587(c)(2).

[19]Section 623, Division B, title VI of Pub. L. No. 108-7, February 20, 2003.

[20]40 U.S.C. 587(d)(2).

[21]See Section 323 of Pub. L. No. 106-291, October 11, 2000; Section 319 of Pub. L. No. 107-63, November 5, 2001; and Section 314, Division F, title III of Pub. L. No. 108-7, February 20, 2003. A similar provision was also included in Section 324 of title III of the Appendix to Pub. L. No. 106-113, November 29, 1999.

using funds as described by this provision—DOI and DOE—as having provided funds for telework center usage fees in fiscal year 2002.

Generally, when statutory provisions in separate laws are in conflict, as may be the case with the laws detailed above, the requirements of the most recently passed law supercede the requirements of the earlier law. In this case, the provision prohibiting the use of funds for "GSA telecommunication centers" would take precedence over the provision that requires specified agencies to make $50,000 available annually for use of the GSA telework centers, but only for those departments or agencies that are common to both provisions. However, because of the lack of a definition or explanation for "GSA telecommunication centers" in the appropriations law and the fact that the legislative history does not provide any insight, it is not clear whether the provisions are in conflict. Given that both of these provisions refer to one or more types of GSA operations, GSA should work with Congress to determine what was meant by the phrase "GSA telecommunication centers" and then issue guidance to the relevant agencies to clarify these provisions and explain the impact of these laws on agencies' telework programs.

Congress has also provided agencies with several tools to support telework. For example, federal agencies were authorized to spend money for installation of telephone lines, related equipment, and monthly charges for federal teleworkers through legislation that was originally enacted in 1990 and made permanent in 1995.[22] In 1992, Congress established the first federal telework centers, which were to be maintained by GSA.[23] Since then, Congress has passed several laws to continue funding the centers, change the formula for funding the centers, and add new telework center locations.[24]

---

[22]Section 620 of Pub. L. No. 104-52, November 19, 1995, 31 U.S.C. 1348 note.

[23]Pub. L. No. 102-393, October 6, 1992.

[24]See, for example, Pub. L. No. 103-123, October 26, 1993; Sections 5 and 6 of title V of Pub. L. No. 104-52, November 19, 1995; Section 407 of Pub. L. No. 104-208, September 30, 1996; and Section 411 of Pub. L. No. 105-277, October 21, 1998.

The legislative framework for telework also contains provisions that provide both GSA and OPM with lead roles in the implementation of telework in the federal government. As stated above, Pub. L. No. 106-346 directs OPM to provide that the requirements of the law are applied as specified with regard to the federal workforce. In addition, $500,000 of the money appropriated for OPM's salaries and expenses for fiscal year 2003 is intended to be used by OPM to provide a telecommuting training program to educate managers in executive branch agencies, where less than 2 percent of employees telework, about the benefits and logistics of telework.[25] According to OPM's comments on a draft of this report, the agency plans to conduct focus groups for managers in four locations across the country this summer to identify reasons why some managers resist permitting telework. OPM plans to use the focus group data to tailor agency telework training. OPM indicated that it plans to train agencies' human resources directors and telework coordinators and provide them promotional telework materials. Congress has also provided GSA with a lead role in the federal government's telework initiative, giving the agency responsibility for maintaining the federal telework centers and the authority to provide guidance, assistance, and oversight regarding the establishment and operation of telework and other distributive work arrangements.[26]

Lack of Clarity in OPM Guidance Led to Misleading Telework Data, but OPM Has Recently Taken Steps to Address This Issue

Until recently, OPM had not defined a statement contained in its February 2001 guidance regarding the implementation of Pub. L. No. 106-346, which told agencies that employees who wanted to participate in teleworking must be allowed that opportunity. Without such a definition, we found that the agencies we reviewed did not use equivalent interpretations of this statement, resulting in their reporting incomparable data to OPM. These data were subsequently included in OPM's 2003 report to Congress on the status of telework in the federal government. After we discussed this issue with OPM officials, OPM reacted promptly by issuing new guidelines that defined what it meant by allowing this opportunity.

Our discussions with officials at the four agencies we reviewed and analysis of data in OPM's January 2003 report to Congress revealed that, without a definition from OPM regarding what constituted being allowed

---

[25]H.R. Report No. 108-10, February 13, 2003, p. 1352.

[26]Pub. L. No. 102-393, October 6, 1992; 40 U.S.C. 587(b)(1) and (c)(3).

the opportunity to telework, agencies had not always used equivalent interpretations of this statement in reporting their data. For example, telework program officials at both GSA and OPM told us that, for their internal programs, they considered eligible employees to have been allowed the opportunity to telework if they chose to apply for telework or discuss the option of teleworking with their managers, regardless of whether they were actually approved for telework. In keeping with this interpretation, these two agencies reported, in response to OPM's 2002 governmentwide telework survey, that essentially the same number of employees who were eligible for telework had also been given that opportunity. On the other hand, Education and VA reported significant differences between the number of employees who were eligible for telework and those who were given the opportunity to telework, which demonstrated that they were using different interpretations of opportunity than GSA and OPM. Because these agencies were not applying equivalent interpretations of the term "opportunity," the data that they provided in response to OPM's survey and that OPM included in its report to Congress were not comparable across agencies. Moreover, OPM's 2003 report to Congress showed these data as the number of eligible employees "offered" telework, although OPM had not made it clear, in either the survey or in its previously issued guidance, that agencies should interpret allowing the opportunity to mean directly offering eligible employees the option to telework. Furthermore, characterizing all agencies' data in this manner is misleading because, as shown above, some agencies did not use that interpretation in reporting the data.

We met with OPM officials in late April 2003 and informed them that the lack of a written definition of what OPM meant when it asked agencies to report how many eligible employees had been allowed the opportunity to telework had resulted in incomparable telework data. To its credit, OPM reacted promptly by defining the statement in a set of frequently asked questions that were distributed at its quarterly telework coordinators' meeting on May 6, 2003, and in a new telework guide for managers, supervisors, and telework coordinators that was released 2 days later.[27] Both the frequently asked questions and the guide indicate that agencies should offer eligible employees the opportunity to telework by having supervisors extend the option of teleworking to all employees they determine are eligible, using established criteria. To ensure that the

---

[27]U.S. Office of Personnel Management, *Telework: A Management Priority—A Guide for Managers, Supervisors, and Telework Coordinators* (Washington, D.C.: May 2003).

information contained in the guide reaches all federal telework coordinators, an OPM official said that a hard copy of this guide would be mailed to each coordinator. In addition, the guide has been posted at www.telework.gov.

OPM also further clarified the statement about allowing eligible employees an opportunity to telework by including a definition in the draft survey it plans to send to agencies in the fall to obtain data for its January 2004 status report to Congress. Immediately following our meeting with OPM officials, this draft survey was distributed at OPM's May 2003 quarterly telework coordinators meeting. As in last year's survey, respondents would be asked for the number of eligible employees given the opportunity to telework. However, the following additional wording has been proposed for that question: "How many eligible employees are given the opportunity to telework, i.e. are actively asked if they wish to telework or are able to telework because their supervisor informed them they could telework on some basis?" If this new definition is properly applied by all agencies in reporting data to OPM, this should address the issue we found. Also included in the draft survey are two new proposed questions related to allowing employees the opportunity to telework. These questions ask how employees were presented with the option to telework and how many turned it down.

The steps taken by OPM in response to our findings show a ready willingness to address issues that are hindering telework implementation. Continued efforts by OPM to publicize these new telework guidelines will help to ensure that telework coordinators in federal agencies have a clear understanding of the information they need to fully implement their own telework programs.

GSA and OPM Provide Services and Resources to Support Governmentwide Telework Implementation, but Their Efforts Have Not Been Well Coordinated

As discussed earlier, the legislative framework for telework has provided both GSA and OPM with lead roles in the implementation of telework in the federal government, providing each agency with responsibilities for the telework initiative. Given these responsibilities, GSA and OPM provide federal agencies with a range of services and resources related to this initiative. Table 1 summarizes their efforts in this regard.

Table 1: Summary of Services and Resources Provided or Offered by GSA and OPM

Services and resources provided jointly by GSA and OPM	GSA and OPM
Run a Web site (www.telework.gov), which was designed to provide information and guidance	X
Established and led the Interagency Telework Issues Working Group, which canvassed agencies to examine existing policies and produced a report with a series of recommendations in August 2002	X

Services and resources provided individually by GSA and/or OPM	GSA	OPM
Provides guidelines for agencies implementing telework programs	X	X
Conducts telework-related research and produces reports on telework issues	X	X
Conducts and participates in seminars	X	X
Develops telework training materials	X	X
Provides customer support and consulting	X	X
Provides general promotion, advocacy, and outreach (promotion of telework policy through publications, speaking engagements, brochures, conferences, etc.)	X	X
Is responsible for federal telework centers, including managing and encouraging other agencies to use the centers	X	
Offered agencies a free 60-day trial period of the telework centers from March through June 2002	X	
Established and maintains a mailing list server for telework coordinators	X	
Developed a list of agencies' telework coordinators	X	
Has an agency outreach initiative to assess program barriers and successes at federal agencies		X
Hosts quarterly telework coordinators' meetings		X

Source: GAO analysis of testimonial evidence and/or information and documentation collected.

As shown in table 1, some of the services and resources are offered jointly by both agencies, while others are offered individually by both agencies or uniquely by either GSA or OPM. For example, each of these agencies independently provides consulting, marketing, and training services, but only OPM has undertaken an outreach effort to meet face to face with agencies' telework coordinators and GSA has sole responsibility for federal telework centers.

In addition, although a GSA official told us that GSA has been promoting its E-Connected Intelligent Remote Operations (EIRO) feature as a mobile solution for government agencies, we found that this feature was not functioning for a period of at least 5 months in 2003. According to its Web site,[28] EIRO was supposed to have launched in March 2001 and was intended to offer services and products from GSA Federal Supply Schedules[29] for mobile government work, including telework. The EIRO Web site also states that customers seeking mobile solutions could identify providers that are highlighted as EIRO contractors by the EIRO logo at "GSA Advantage!", GSA's online shopping and ordering system; however, a GSA official told us that this function was never operational. Also, although this official told us that EIRO had launched on schedule, from a period of at least January 2003 through May 2003, we observed that this feature was not functional. We asked numerous GSA officials about the status of this feature, but they were all unaware of the problems we were experiencing. In fact, one official told us that GSA had been promoting EIRO to federal agencies as if it were a functioning feature. Ultimately, a GSA official told us that changes to the agency's Web portals must have disabled the EIRO feature and assured us that GSA is pursuing solutions to get it back online.

Although GSA and OPM share responsibilities for the governmentwide telework initiative and a GSA official recently indicated that GSA and OPM have expressed a new commitment to working together, their past efforts did not always demonstrate coordination. According to officials at both agencies, GSA and OPM have not developed a Memorandum of Understanding or other formal agreement regarding their responsibilities for the federal government's telework initiative or regarding which agency will provide specific services, resources, and guidance. Therefore, these agencies have not established a delineation of their respective roles. In comments on a draft of this report, GSA and OPM said that they have recognized the need to better outline separate and shared responsibilities and that a Memorandum of Understanding was among the options they were considering to clearly designate each agency's responsibilities.

---

[28]www.eiro.gsa.gov.

[29]GSA's Federal Supply Schedules are contracts that allow federal customers to acquire services and products directly from commercial suppliers.

Despite the fact that GSA and OPM hold quarterly partnership meetings to discuss telework-related issues in the federal government, officials from both agencies told us that very little coordination has occurred at these meetings. Rather, the meetings have actually served as a means to raise differences of opinion that have been identified by either agency, but the resolution of those differences has proven to be difficult. In addition, according to the GSA and OPM officials, these meetings are used to present updates on the status of the two agencies' independent governmentwide telework efforts, not to collaborate on these efforts. On occasion, officials from each agency have asked officials from the other agency to provide comments on their independent draft guidelines or other information.

In addition, a GSA official told us that agencies had expressed concern about conflicting messages they had received from GSA and OPM on several topics, including dependent care and emergency government office closings. For example, officials from both GSA and OPM confirmed that they had different positions with regard to dependent care. GSA's position is that employees can care for dependents when teleworking, as long as it does not interfere with accomplishing tasks, while OPM's position was, until recently, that dependents should not be in the home when an employee is teleworking. An OPM official told us that the agency held this position because having dependents in the home while teleworking could foster managerial resistance to telework. In its recently released telework guide for managers, supervisors, and telework coordinators, OPM revised its position on this issue, stating that a teenager or elderly dependent might be at home while the employee teleworks if those dependents are independently pursuing their own activities. It also said that teleworkers should not generally be engaged in caregiving activities while working and that dependent care arrangements should not typically change because the employee is teleworking.

Also, despite the fact that both GSA and OPM shared responsibility for developing the governmentwide telework information Web site (www.telework.gov), a GSA official told us that OPM, which hosts the joint Web site, independently changed the layout and content of the site in late 2002 without consulting with or informing GSA about the changes. The GSA official also said that GSA subsequently met with OPM and the contractor that redesigned the site to try to resolve some of GSA's concerns. According to the official, the contractor ultimately agreed with GSA and recommended that OPM make changes to the site, because it looked too much like an OPM site and not like the telework site for the entire federal government. While an OPM official confirmed this

information, she said that OPM has rejected these changes because of "internal Web design policies." In their combined comments on a draft of this report, however, GSA and OPM indicated that there was no disagreement regarding the Web site and that "both agencies continue to actively and successfully collaborate on www.telework.gov."

Furthermore, a GSA official told us that GSA had asked OPM to place a link to the Interagency Telework Issues Working Group report on the governmentwide telework Web site, but OPM had refused to do so, despite the fact that the working group was jointly formed by both agencies. An OPM official told us that OPM has been hesitant to post this report because many of its recommendations were directed at OPM and could not be readily implemented. In their combined comments on a draft of this report, however, GSA and OPM said that the two agencies had jointly determined it would be inappropriate to post the "pre-decisional" Interagency Telework Issues Working Group report on the federal telework information Web site until they had had the opportunity to analyze its findings, address issues contained therein, and fully consider all recommendations. GSA, though, has already independently posted this report on its own Web site with a disclaimer, stating: "This final report does not in any way, specific or implied, represent the official views, positions, or policies of the U.S. Government, OPM, GSA, nor any of the agencies participating on the Working Group. This report is currently under review by both OPM and GSA." Given that GSA and OPM co-led this group with participation from 15 federal agencies to identify policy actions needed to facilitate agency use and expansion of telework and then make recommendations, we believe that the report should be posted on www.telework.gov, with the same or a similar disclaimer, in the interests of transparency.

After we discussed the issues created by the lack of coordination between GSA and OPM with both agencies, a GSA official indicated that GSA and OPM expressed a new commitment to coordination, especially with regard to the governmentwide telework Web site. Such a commitment reflects a promising start for better assisting federal agencies in improved implementation of their telework programs. However, the key to success will be sustained efforts by both agencies to work together in assisting agencies and providing consistent and straightforward guidance, services, and resources on the governmentwide telework initiative. Conflicts that have arisen from the lack of coordination in the past underscore the need for GSA and OPM to work together to reach a formal agreement establishing a delineation of their respective roles regarding the governmentwide telework initiative in areas where their respective

responsibilities are not clear. In areas where the responsibility is clearly aligned with the mission of a particular agency, that agency should be responsible for providing official guidance related to telework. However, the agencies should consult with each other and attempt to reach consensus in providing that guidance. Care should be taken to avoid situations in which agencies are either left without needed guidance or provided with conflicting guidance because GSA and OPM cannot reach agreement.

Selected Federal Agencies Are Not Fully Implementing Key Telework Practices

We identified 25 key practices in telework-related literature and other sources as those that federal agencies should implement in developing their individual telework programs.[30] For the purposes of analysis, we grouped the key practices into the following seven categories: program planning, telework policy, performance management, managerial support, training and publicizing, technology, and program evaluation. Based on our interviews with agency officials at four selected agencies—Education, GSA, OPM, and VA—and review of program documentation and other information related to those agencies, we then determined the extent to which the agencies had implemented each of the practices that were identified in developing their telework programs.

While all four agencies we reviewed have taken at least some steps to implement most of the key practices, we found that only 7 of the 25 key practices had been fully implemented by all four agencies. Our analysis also revealed that almost half of the key practices had not been fully implemented by at least three of the four agencies, demonstrating a need for these agencies to focus greater attention on the remaining key practices to develop successful telework programs. Although some telework-related resources from GSA and OPM, including GSA's telework implementation manual and OPM's recently released telework guide for managers, supervisors, and telework coordinators, already provide federal agencies with information on how to implement several of the key practices we

---

[30]The 25 key practices identified for telework programs are also closely aligned with 6 key practices we have identified in our earlier work for effectively using human capital flexibilities. See U.S. General Accounting Office, *Human Capital: Effective Use of Flexibilities Can Assist Agencies in Managing Their Workforces*, GAO-03-2 (Washington, D.C.: Dec. 6, 2002) and *Managing for Results: Building on the Momentum for Strategic Human Capital Reform*, GAO-02-528T (Washington, D.C.: Mar. 18, 2002).

identified, agencies may need additional guidance, guidelines, and/or individualized technical support to fully implement these practices.

Regular attention to the practices we identified can help to foster program growth and remove barriers to telework participation. Figure 2 illustrates the extent to which the agencies reviewed had implemented each of the practices.

Figure 2: Extent to Which Selected Agencies Had Implemented Key Telework Practices

Categories and practices	Education	GSA	OPM	VA
Program planning				
Designate a telework coordinator.	●	●	●	●
Establish a cross-functional project team, including, for example, IT, union representatives, and other stakeholders.	●	●	●	●
Establish measurable telework program goals.	○	○	○	○
Develop an implementation plan for the telework program.	●	—	●	○
Develop a business case for implementing a telework program.	◐	○	○	○
Provide funding to meet the needs of the telework program.	◐	◐	◐	◐
Establish a pilot program.	●	○	○	○
Telework policy				
Establish an agencywide telework policy.	●	●	●	●
Establish eligibility criteria to ensure that teleworkers are selected on an equitable basis using criteria such as suitability of tasks and employee performance.	◐	◐	◐	◐
Establish policies or requirements to facilitate communication among teleworkers, managers, and coworkers.	●	○	●	○
Develop a telework agreement for use between teleworkers and their managers.	●	●	●	●
Develop guidelines on workplace health and safety issues to ensure that teleworkers have safe and adequate places to work off-site.	●	◐	◐	○
Performance management				
Ensure that the same performance standards, derived from a modern, effective, credible, and validated performance system, are used to evaluate both teleworkers and nonteleworkers.	◐	○	◐	○
Establish guidelines to minimize adverse impact on nonteleworkers before employees begin to work at alternate worksites.	●	○	●	●
Managerial support				
Obtain support from top management for a telework program.	○	◐	●	○
Address managerial resistance to telework.	◐	◐	●	◐
Training and publicizing				
Train all involved, including, at a minimum, managers and teleworkers.	◐	◐	◐	○
Inform workforce about the telework program.	◐	●	●	◐
Technology				
Conduct assessment of teleworker and organization technology needs.	●	◐	●	○
Develop guidelines about whether organization or employee will provide necessary technology, equipment, and supplies for telework.	●	●	●	●
Provide technical support for teleworkers.	●	●	●	●
Address access and security issues related to telework.	●	●	●	●
Establish standards for equipment in the telework environment.	●	●	◐	●
Program evaluation				
Establish processes, procedures, and/or a tracking system to collect data to evaluate the telework program.	◐	◐	◐	◐
Identify problems and/or issues with the telework program and make appropriate adjustments.	◐	○	◐	◐

● Agency has fully implemented this practice
◐ Agency has taken some steps to implement this practice
○ Agency has not taken any steps to implement this practice
— Could not assess

Source: GAO analysis of testimonial evidence and/or information and documentation collected.

Importantly, the table above is intended to provide an overall summary of the history and status of the telework programs at the respective agencies. For some of the practices that are historical in nature, such as developing an implementation plan and establishing a pilot program, we recognize that agencies with existing telework programs cannot, and should not, attempt to implement these practices at this point. However, existing programs that did not initially implement some of the more developmental practices can still be successful with sustained attention to the other practices we identified. Below is a summary of the practices contained in each category and an overview of what we found for each practice. Appendix II also includes a detailed discussion of the steps each agency has taken to implement the practices.

Program Planning

In planning for an effective telework program, agencies need to take several important steps. Agencies should designate a telework coordinator, establish a cross-functional project team, establish measurable telework program goals, develop an implementation plan for the telework program, develop a business case for implementing a telework program, provide funding to meet the needs of the telework program, and establish a pilot program. As shown in figure 2, our analysis of the telework programs at the four agencies reviewed revealed that only two of the seven practices in the program planning category—designating a telework coordinator and establishing a cross-functional project team—have been fully implemented by all of these agencies. The remaining five practices, including establishing measurable program goals and providing funding to meet the needs of the telework program, still need to be implemented by some or all of the agencies.

Telework Policy

According to Pub. L. No. 106-346, agencies must establish a telework policy that allows eligible employees to participate in telework. Telework-related literature suggests that, in addition to or within an agencywide telework policy, agencies should establish eligibility criteria to ensure that teleworkers are selected on an equitable basis using criteria such as suitability of tasks and employee performance; establish policies or requirements to facilitate communication among teleworkers, managers, and coworkers; develop a telework agreement for use between teleworkers and their managers; and develop guidelines on workplace health and safety issues to ensure that teleworkers have safe and adequate places to work off-site. As shown in figure 2, our analysis indicates that two of the five practices in this category, including establishing an agencywide telework

policy, have been fully implemented by all of the agencies. The remaining three practices, including establishing eligibility criteria to ensure that teleworkers are selected on an equitable basis, still need additional attention to be fully implemented by some or all of the agencies we reviewed.

Performance Management

Our recent work identified key practices that high-performing organizations need to employ to develop effective performance management systems. Such a system should be designed, implemented, and continually assessed by how well it helps the employees help the organization achieve results and pursue its mission.[31] Using standards derived from a modern, effective, credible, and validated performance system, telework-related literature suggests that agencies need to take steps to ensure that the same performance standards are used to evaluate both teleworkers and nonteleworkers. In addition, agencies need to establish guidelines to minimize adverse impacts that telework can have on nonteleworkers before employees begin to work at alternate worksites. Figure 2 shows that two of the four agencies we reviewed have taken some steps to implement the practice of setting the same performance standards for teleworkers and nonteleworkers and three of the four agencies had fully implemented the practice of establishing guidelines to minimize adverse impacts of telework on nonteleworkers.

Managerial Support

Telework-related literature has shown that it is critical to obtain support from top management and to address managerial resistance in establishing an effective telework program. As our earlier work has shown, and others recognize, changes in an organization's culture, such as the acceptance of flexibilities like telework by managers throughout the organization, are highly dependent on top management's support for and commitment to

---

[31]U.S. General Accounting Office, *Results-Oriented Cultures: Creating a Clear Linkage between Individual Performance and Organizational Success*, GAO-03-488 (Washington, D.C.: Mar. 14, 2003).

those changes.[32] In addition, our 1997 report on agencies' policies and views on telework in the federal government identified managerial resistance as the largest barrier to implementing telework.[33] This resistance can be attributed to several factors, including general resistance to change, since telework requires managers to shift from managing by observation to managing by results. However, as shown in figure 2, both of these practices still need attention by most of the agencies we reviewed.

Training and Publicizing

Because telework involves new ways of working, as well as supervising, telework-related literature suggests that both employees and supervisors should receive training to ensure a common understanding of the program. The Interagency Telework Issues Working Group report highlighted the need for telework training in its report. In addition, the report states that telework training should consist of two key components. One of these components should address policy issues and include general information, such as policy updates and an orientation to telework, while the other component should focus on telework program activities, including such topics as information technology (IT) applications, performance management, and time management. Telework-related literature also suggests that it is important to inform the workforce about the telework program. Despite their importance, figure 2 illustrates that both of these practices still need attention by some or all of the agencies we reviewed.

Technology

OPM's January 2003 report to Congress on the status of telework in the federal government identified data security and IT issues as the two most frequently cited barriers to telework, as reported by federal agencies. In

---

[32]See, for example, the following GAO products: *Human Capital: Effective Use of Flexibilities Can Assist Agencies in Managing Their Workforces*, GAO-03-2 (Washington, D.C.: Dec. 6, 2002); *A Model of Strategic Human Capital Management—Exposure Draft*, GAO-02-373SP (Washington, D.C.: Mar. 15, 2002); *Managing for Results: Next Steps To Improve the Federal Government's Management and Performance*, GAO-O2-439T (Washington, D.C.: Feb. 15, 2002); and *Human Capital: Practices That Empowered and Involved Employees*, GAO-01-1070 (Washington, D.C.: Sept. 14, 2001). Also see Booz Allen Hamilton, *Analysis of Home-Based Telework Technology Barriers: Final Report on Technology Barriers to Home-Based Telework* (Washington, D.C.: Apr. 5, 2002) and U.S. Environmental Protection Agency, *Telecommuting/Telework Programs: Implementing Commuter Benefits under the Commuter Choice Leadership Initiative* (Washington, D.C.: Sept. 2001).

[33]GAO/GGD-97-116.

addressing technology barriers, telework-related literature suggests that agencies should conduct an assessment of teleworker and organization technology needs; develop guidelines about whether the organization or employee will provide necessary technology, equipment, and supplies for telework; provide technical support for teleworkers; address access and security issues related to telework; and establish standards for equipment in the telework environment. Generally, as shown in figure 2, the four agencies we reviewed did better in this category than in any other. One of the agencies—Education—has fully implemented all of the technology practices and the other three agencies each have only one practice out of the five that had not been fully implemented. However, given the rapidly changing nature of technology and the fact that, in OPM's 2002 telework survey, many agencies governmentwide identified data security and IT as barriers to growth in their telework programs, federal agencies should provide specific and ongoing attention to these technology practices.

Program Evaluation

Telework-related literature recommends that agencies develop program evaluation tools and use such tools from the very inception of the program to identify problems or issues with the program and to develop an action plan to guide any necessary changes for telework or for the organization. The literature also emphasizes the need for tracking systems that can help to accurately ascertain the status of telework implementation in the agencies and, subsequently, the federal government. Such a tracking system should include, at the very least, a formal head count of regular and episodic teleworkers, as well as nonteleworkers. To this end, the Interagency Telework Issues Working Group report recommended that OPM require all federal agencies to establish a system for collecting the information that OPM requests for its annual report to Congress on the status of telework in the federal government. It further recommended that OPM provide agencies with the necessary specifications, guidance, and technical assistance to establish these systems.

Despite the fact that accurate data are absolutely integral to assessing the status of a telework program and identifying areas that require additional attention, figure 2 shows that none of the agencies we reviewed have fully implemented the practice of establishing processes, procedures, and/or a tracking system to evaluate their telework programs. In addition, all of the four agencies still need to take at least some steps to fully implement the practice of identifying problems and/or issues with their telework programs and making appropriate adjustments.

Agency Officials Identified Governmentwide Actions That Could Be Taken to Encourage Federal Agencies to Increase Telework Participation

In addition to the key practices we identified as being integral to developing successful federal telework programs, we asked agency program officials and union representatives at GSA, Education, OPM, and VA for their views on what governmentwide actions could be taken to increase telework participation in federal agencies. We also spoke with officials representing federal employees governmentwide, such as the National Treasury Employees Union and the National Federation of Federal Employees, to obtain their views on potential governmentwide actions. In addition, OPM's November 2002 telework survey asked agencies about what OPM's governmentwide telework initiative could do to assist agencies in fully implementing telework policies.

Some agency and union officials identified governmentwide actions that are closely related to the key practices we identified, such as the need for funding of telework programs, the need for training, and the importance of obtaining top-level support for telework. In addition, several officials identified the need for GSA and OPM to provide more guidance or information about telework and the need for clarification regarding the implementation of the telework provisions in Pub. L. No. 106-346. In particular, agency officials identified a need for additional guidance related to their data reporting and collection methods for OPM. Two agency officials stated that OPM has changed the data that it requests from agencies from year to year, which has made it difficult for them to establish systems to collect the necessary data.

Conclusions

Telework has received significant attention in Congress and the executive branch and is an increasingly popular flexibility among federal employees. Not only is telework an important flexibility from the perspective of employees, but it has also become a critical management tool for coping with potential disruptions to the workplace, including terrorism. However, the federal government's telework initiative needs further development to become an effective human capital flexibility.

Congress' most significant demonstration of support for telework was the enactment of Section 359 of Pub. L. No. 106-346. In guidance related to that law, OPM told agencies that eligible employees who wanted to telework must be allowed that opportunity, but did not provide a definition for what constituted such an opportunity. Although the lack of a definition for that statement resulted in the reporting of incomparable telework data to Congress, OPM promptly released publications defining the previously

ambiguous statement following a discussion in which we highlighted this issue for OPM officials.

On the other hand, the relationship between two other provisions—one that requires specified agencies to set aside $50,000 each year for the use of GSA telework centers and one that prohibits some of the same agencies and several others from spending funds on GSA telecommunication centers—remains in need of clarification. Although GSA telework centers are not known by the term "GSA telecommunication centers," GSA officials believe that this term does in fact refer to GSA telework centers. Despite this belief, it has not been made clear to all applicable agencies that the provision prohibiting certain agencies from spending appropriated funds on GSA telecommunication centers applies to GSA telework centers. This was supported by the fact that two of the relevant agencies used appropriated funds for GSA telework centers in fiscal year 2002, even though the provision prohibiting them from spending appropriated funds on GSA telecommunication centers was in effect.

Although GSA and OPM are lead agencies for the governmentwide telework initiative, they have not fully coordinated their efforts in leading the governmentwide telework initiative and have had difficulty in resolving their conflicting views on telework-related matters. This lack of coordination created confusion for federal agencies in implementing their individual telework programs. Both GSA and OPM officials recently indicated a willingness to work together to resolve this issue, but sustained attention and actions that result in actual solutions will still be needed.

In addition, the key telework practices we identified are integral to the success of the telework initiative in the federal government and need to be considered individually by each federal agency within the context of its own mission, programs, and telework programs. However, as our work at four agencies has shown, agencies face numerous difficulties in implementing their individual agency programs. Regular attention by agencies to the key practices is important to foster program growth and remove barriers to telework participation.

Recommendations for Agency Action

We recommend that the Administrator, GSA, work with Congress to determine what was meant by the phrase "GSA telecommunication center" in Section 314, Division F, title III of Pub. L. No. 108-7 and whether this provision is in conflict with the provision contained in 40 U.S.C. 587(d)(2). Once these determinations are made, GSA should issue guidance to the

relevant agencies to clarify these provisions and explain the impact of these laws on agencies' telework programs.

We also recommend that the Administrator, GSA, and the Director, OPM, ensure that the offices in their agencies with responsibilities for the governmentwide telework initiative improve coordination of their efforts to provide federal agencies with consistent, inclusive, unambiguous support and guidance related to telework. To do so, they should clearly delineate their responsibilities for this initiative and work together to resolve existing areas of difference. The Memorandum of Understanding that the agencies are considering could be very helpful in making progress on this key issue.

Furthermore, to enable agencies to more effectively implement the key practices that we identified as those that should be used for successful implementation of federal telework programs, we recommend that the Administrator, GSA, and the Director, OPM, use their lead roles in the federal telework initiative to assist agencies in implementing these practices. Using the key telework practices, GSA and OPM should identify areas where more information about implementation of the practices may be needed and provide agencies with the additional guidance, guidelines, and/or individualized technical support necessary to assist them in implementing those practices that are still in need of attention. Additionally, OPM agreed with a recommendation included in our recent report for OPM to serve as a clearinghouse in sharing and distributing information about the broad range of human capital flexibilities available to federal agencies.[34] In implementing that recommendation, OPM should include information about telework, because it is such a flexibility. To provide agencies with the capabilities to effectively implement telework, both GSA and OPM should continue to monitor agencies' telework programs and align their efforts with areas that are still in need of attention.

Agency Comments

We provided a draft of this report in June 2003 to the Secretaries of Education and VA, the Administrator, GSA, and the Director, OPM. The Director of Human Resources Services from Education provided comments via e-mail (see app. III for a summary of these comments). In

---

[34]U.S. General Accounting Office, *Human Capital: OPM Can Better Assist Agencies in Using Personnel Flexibilities*, GAO-03-428 (Washington, D.C.: May 9, 2003).

addition, we received written comments from the Secretary, VA, and joint written comments from the Administrator, GSA, and the Director, OPM, in response to a draft of this report (see app. IV and V). Where appropriate, we made changes in our report in response to these comments.

In its comments, Education generally agreed with the contents of the draft report and stated that the department was pleased that we recognized its efforts to advance telework. Additionally, the comments stated that the department's "most significant comment" was, as our draft noted, the need for a clear, unambiguous, and universally accepted definition for what it means to allow employees the opportunity to telework.

VA agreed with our conclusion that there is a need for further guidance and assistance from GSA and OPM regarding federal telework implementation and suggested two areas where such guidance would be helpful. Specifically, VA indicated that OPM needs to redefine participant eligibility criteria and that OPM and GSA should provide guidance on how to effectively use telework in emergency situations. In addition, VA expressed concern that the draft report, which stated that we used participation rate as one of the criteria used in our selection of agencies, did not recognize that VA's mission is a significant factor accounting for its limited telework participation rate. VA also disagreed with several of our findings related to the status of VA's implementation of the telework practices we identified. However, when we asked for documentation to support the statements that VA made in its comments, VA was unable to provide such information. Absent any evidence that would support VA's comments, our assessment remains unchanged.

In their combined comments, GSA and OPM agreed that telework is an important tool for federal agencies and stated that they would encourage and champion telework as a key human capital flexibility and do everything possible to facilitate its acceptance and use. The agencies also agreed to implement our recommendation that they use their lead roles in the federal telework initiative to assist agencies in implementing the key telework practices we identified. In this regard, GSA and OPM stated that they will provide agencies with a checklist of the practices we identified and recommend that agencies do a self-assessment of their telework programs using our analytical framework. Both GSA and OPM will then offer to help agencies to improve in the identified areas of deficiency. OPM will also include the key telework practices that we identified in telework training, which, as we had noted in the draft report, is being developed for launch on its Web-based training site during fiscal year 2003.

In addition, GSA agreed with our recommendation that it work with Congress to determine what was meant by the phrase "GSA telecommunication center" in Section 314, Division F, title III of Pub. L. No. 108-7 and whether this provision is in conflict with the provision contained in 40 U.S.C. 587(d)(2). GSA stated that it will coordinate internally and with the appropriate congressional committees to resolve the conflicting language in the statutes and then provide clarification to its customer agencies.

On the other hand, both GSA and OPM disagreed with several of our findings relating to their lead roles in the governmentwide telework initiative. For example, GSA and OPM strongly disagreed with our finding that they have not fully coordinated their governmentwide telework efforts in the past. This contradicts information that was conveyed to us by agency officials during our review. However, we have added to the report, where appropriate, to reflect the agencies' new position on the issue of coordination. Interestingly, despite the fact that GSA and OPM disagreed with our finding relating to coordination, the agencies also said in their comments that they have recognized the need to better outline separate and shared responsibilities and that a Memorandum of Understanding was among the options they were considering to clearly designate each agency's responsibilities.

OPM also raised a number of issues with our analysis of its internal telework program. In its comments, OPM stated "[E]ach comment listed was conveyed to GAO during the interview process." On the contrary, OPM's comments, for the most part, contain new information and/or information that does not correspond with what was conveyed to us by OPM officials during our review. Much of this information contradicts what was conveyed to us by agency officials during our review. However, we have changed the report where appropriate to reflect OPM's new positions on some issues.

GSA did not disagree with our findings pertaining to its internal telework program. However, the agency did note several areas where it would like us to revise statements relative to its implementation of the key practices we identified. We considered these comments and incorporated new language into the report where appropriate.

As agreed with your office, unless you announce the contents of this report earlier, we plan no further distribution until 30 days after its issue date. At that time, we will send copies to the Secretary of Education, the Administrator of GSA, the Director of OPM, and the Secretary of VA. We will also provide copies of this report to other interested congressional parties and make copies available to others upon request. In addition, the report will be available at no charge on the GAO Web site at http://www.gao.gov.

If you have any questions about this report, please contact me or Boris Kachura on (202) 512-6806. Key contributors to this report were Joyce Corry, Ellen Grady, Tiffany Tanner, and V. Bruce Goddard.

Sincerely yours,

J. Christopher Mihm
Director, Strategic Issues

Scope and Methodology

The objectives of this report were to

- characterize the federal laws and their requirements that currently apply to telecommuting within the federal agencies in the executive branch;

- determine what the General Services Administration (GSA) and the Office of Personnel Management (OPM) are doing, as lead agencies, to coordinate and promote telecommuting in the federal government;

- determine what selected federal agencies are doing to implement key practices in developing telecommuting programs; and

- identify additional governmentwide actions that could be taken to encourage federal agencies to increase telecommuting participation.

To address these objectives, we gathered information from a variety of sources using several different data collection techniques and analyzed this information. In order to characterize the federal laws and their requirements that currently apply to telecommuting within the federal agencies in the executive branch, we identified and analyzed the relevant laws and discussed the requirements of selected laws with agency officials. To determine what GSA and OPM are doing to coordinate and promote telecommuting in the federal government, we interviewed GSA and OPM officials regarding their governmentwide telework efforts and analyzed relevant documents related to these efforts.

We took several steps to determine what selected executive agencies are doing to implement key practices in developing telecommuting programs. First, we conducted a review of literature and guidelines related to telework in the federal government to identify the key practices that executive agencies should implement in developing telework programs. These guidelines and this literature were obtained from both government and nongovernment sources including studies and reports issued by interest groups, associations, consulting firms, GSA, OPM, and other federal government agencies. A practice was considered to be "key" if it was recommended in three or more sources as a practice that organizations should use in implementing a telework program.

After identifying the key telework practices, we conducted semi-structured interviews of selected telework program officials and other relevant agency officials and analyzed documents related to telework implementation at four agencies—the Department of Education (Education), GSA, OPM, and

the Department of Veterans Affairs (VA). These agencies were selected from the 24 executive agencies covered by the Chief Financial Officers (CFO) Act of 1990 for various reasons, including function, size, and reported level of telework participation.[35] GSA and OPM were selected because of their lead roles in the governmentwide telework initiative. In addition, OPM was reported to have the highest telework utilization rate among the CFO Act agencies. Education was included because its reported utilization rate was the second highest among the CFO Act agencies. VA was selected based on its distinction as the second largest CFO Act agency combined with its having the lowest reported telework utilization rate among the CFO Act agencies.[36] This agency selection process was not designed to produce findings that could be considered representative of telework implementation in the federal government as a whole, but rather to provide illustrative examples of the extent to which selected individual agencies with varied sizes, reported utilization rates, and missions had implemented the key practices identified in our literature review.

We interviewed officials and union representatives from the four selected agencies to obtain their views on additional governmentwide actions that could be taken to encourage federal agencies to increase telecommuting participation. In addition, we contacted other unions representing federal employees, including the National Treasury Employees Union, the American Federation of Government Employees, and the National Federation of Federal Employees, to solicit their views on such additional actions. (Officials for the American Federation of Government Employees did not respond to our request.) Our work was conducted from May 2002 through May 2003 in accordance with generally accepted government auditing standards.

---

[35]Size and level of telework participation were determined from survey data collected by OPM for its January 2002 Report to Congress, entitled *The Status of Telework in the Federal Government*.

[36]In its comments, VA noted that a "significant number of VA employees are engaged in direct patient care and benefit service delivery to veterans, which precludes large-scale participation in telework," which it considers to be a significant factor accounting for its limited telework participation rate.

Descriptions of Efforts by the Selected Agencies to Implement the 25 Key Practices

We identified 25 key practices in telework-related literature and other sources as those that agencies should implement in developing their telework programs. This appendix contains descriptions of how the four agencies reviewed—the Department of Education (Education), the General Services Administration (GSA), the Office of Personnel Management (OPM), and the Department of Veterans Affairs (VA)—are implementing each practice. Although attention to each of these practices is integral to the success of the federal telework initiative, the four agencies we reviewed have not fully implemented many of them. Regular attention to the practices can help to foster program growth and remove barriers to telework participation.

Program Planning

Designating a Telework Coordinator

Telework resources provided by both GSA and OPM in their roles as lead agencies for the federal telework initiative state that, in implementing their telework programs, federal agencies need to designate agency telework coordinators and contacts.[37] All four of the agencies in our study have a designated telework coordinator. At Education, the coordinator works on the agency's telework program full time. At the other three agencies, the telework coordinator has other responsibilities in addition to telework.

Establishing a Cross-Functional Project Team, Including, for Example, IT, Union Representatives, and Other Stakeholders

Our 2002 report on the effective use of flexibilities identified stakeholder input as a key practice for effectively using human capital flexibilities, such as telework.[38] According to this report, agency leaders, managers, employees, and employee unions need to work together to develop policies and procedures, because such involvement helps in reaching agreement on the need for change, the direction and scope that change will take, and how progress will be assessed. Stakeholder input should also be used to ensure that the policies surrounding the use of flexibilities are clear and the

---

[37]In the fiscal year 2003 appropriations for the Departments of Commerce, Justice, and State, the Judiciary, and the Small Business Administration, these departments and agencies are required, amongst other things, to designate a telework coordinator to oversee the implementation of their telecommuting programs. See Section 623, Division B, title VI of Pub. L. No. 108-7, February 20, 2003.

[38]GAO-03-2, 32.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

procedures to implement them are uncomplicated. Telework-related literature suggests that stakeholder involvement should be obtained by establishing a committee with members from human resources, information management, risk management, facilities management, and senior management, as well as employee and union representatives. All four of the agencies we reviewed established cross-functional project teams in implementing their telework programs.

Establishing Measurable Telework Program Goals

According to the International Telework Association and Council's (ITAC) *e-Work Guide*, research conducted by the American Management Association in 2000 indicated that "68 percent of 'highly successful' telework programs felt it was 'critical' to develop clear and reasonable program objectives for their program" and another 27 percent considered it to be helpful.[39] None of the four agencies we examined have taken any steps to implement this practice.

In comments on a draft of this report, both OPM and VA said they had established measurable telework program goals. However, neither agency was able to provide documentation of such goals. Therefore, our assessments of these agencies on this practice remain unchanged.

Developing an Implementation Plan for the Telework Program

Guidelines issued by OPM in its capacity as a leader of the governmentwide telework initiative suggest that agencies should establish a strategic plan with definitive timelines to accomplish implementation of telework including an evaluation tool. The ITAC *e-Work Guide* states that such a plan should include, at a minimum, objectives and how their achievements will be measured; definitions and policy details; a business case, including start-up and ongoing costs; a technology plan; and an implementation plan.[40] Two of the agencies reviewed, Education and OPM, have fully implemented this practice in their internal telework programs, while VA has not taken any steps to implement this practice. However, in comments on a draft of this report, VA said that it had developed an implementation plan for the telework program. When we requested documentation of such a plan, VA responded that, in fact, it did not establish an implementation

---

[39]International Telework Association and Council, *e-Work Guide: How to Make Telework Work for Your Organization* (Washington, D.C.: 2000), 3.

[40]International Telework Association and Council, *e-Work Guide*, 22.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

plan for its current telework policy. Therefore, our assessment of VA on this practice remains unchanged. During our review, GSA's telework coordinator told us that there was not a written implementation plan for the telework program when it was first started. However, in comments on a draft of this report, GSA indicated that it had an implementation plan that was utilized 10 years ago when the program was first developed, but this plan was not kept in the files, because it was no longer in use. Therefore, we were unable to assess GSA's implementation of this practice, and have modified the report accordingly.

Developing a Business Case for Implementing a Telework Program

ITAC's *e-Work Guide* states that "successful telework programs reside in organizations that understand why they support telework, address the relevant issues, minimize business risk and make the investment when it supports their objectives."[41] To achieve such success, the guide recommends that organizations develop business cases for implementing telework programs. The April 2002 report issued by Booz Allen Hamilton on home-based telework technology barriers also recommends that agencies develop business cases for implementing telework in their organizations, because such an approach has proven effective in engaging management on the benefits of telework to an organization.[42] Through business case analysis, organizations have been able to identify cost reductions in the post-telework office environment that offset additional costs incurred in implementing telework and the most attractive approach to telework implementation. Of the four agencies we reviewed, Education was the only agency to have taken some steps to implement this practice. A program official at this agency said that she has developed a PowerPoint presentation of a business case for implementing a telework program at Education. However, she has never actually given this presentation to anyone at Education.

Providing Funding to Meet the Needs of the Telework Program

Telework-related literature suggests that agencies should incorporate requirements for home-based telework into their IT capital planning and budgeting processes and provide for consistent allocation of the resources necessary to establish telework arrangements, such as the equipment and technology needed for remote access to agency networks. However,

---

[41]International Telework Association and Council, *e-Work Guide*, 15.

[42]Booz Allen Hamilton, ES-8 and V-2.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

providing funding to meet the needs of the telework program is a practice that the four agencies have only partially implemented.

Under the provisions of 40 U.S.C. 587(d)(2), the only legislated funding for telework programs that applies to the executive agencies that we reviewed, specified agencies are to make at least $50,000 of the funds appropriated for salaries and expenses available each fiscal year for their employees' use of GSA telework centers.[43] However, the agencies covered under this legislation are not required to spend the money made available. While this provision pertains to all four of the agencies in our study, neither VA nor OPM actually spent at least $50,000 for telework center use in fiscal year 2002. In contrast, both Education and GSA spent more than this minimum set aside.[44]

Although VA's telework policy states that the agency's telework assignments may be established at community-based telework centers when determined to be consistent with the agency's mission, a program official said that VA generally does not choose to support use of the centers. In fiscal year 2002, VA spent only $6,800 for two users at one telework center. OPM's expenditures for telework center use in that year were about $36,400. At Education, the telework program requests at least a 10 percent increase in funds to be made available each year over those requested the preceding year. For example, for fiscal year 2002, $82,000 was requested and approved, while for fiscal year 2003, $125,000 was requested and approved. An Education program official said that the 2003 request was much greater than the 2002 request because, in 2002, the agency actually spent over $87,000 for use of the centers and the demand was far greater than she had anticipated or could fund. The expenditures for telework center use at GSA in 2002 were about $97,000.

In addition to the funds made available for employees to work at telework centers, each of the four agencies pays the salaries of telework coordinators. In its comments on our draft report, GSA said that it did not have a central telework fund. Instead, it said that individual organizations

---

[43]Section 623, Division B, title VI of Pub. L. No. 108-7 also provides $100,000 to the Departments of Commerce, Justice, and State, the Judiciary, and the Small Business Administration for the implementation of telecommuting programs.

[44]Expenditures for fiscal year 2002 telework center use at the four agencies were included in OPM's January 2003 report to Congress, entitled *The Status of Telework in the Federal Government*. OPM used data gathered by GSA for reporting these expenditures.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

within GSA provided their own funding for telework. We had considered this information in our assessment of GSA's level of implementation of this practice. OPM said in its comments that the agency funds staff time to provide oversight and evaluation for the telework program, as well as outreach and program promotion, but it is not clear whether such funding would go beyond the already cited salary payment for OPM's part-time telework coordinator or would even be related to OPM's internal telework program as opposed to OPM's governmentwide efforts. In addition, OPM stated that it had identified resources to accommodate "every employee (who is otherwise eligible and wants to telecommute) with appropriate computer equipment, technology support, and remote connections." However, OPM did not provide documentation of this funding. Also, an IT official at OPM said that there were times that the agency has been short on the older computers it loans to teleworkers. He said that the people who absolutely need to telework get computers immediately, if they require one, but that people who would like to telework, but do not have a "need" to do so, have had to wait to begin teleworking until computers became available. According to this IT official, managers usually make the decision about whether telework is a "need," although employees will sometimes decide for themselves that it is not necessary for them to telework. Given these considerations, we did not change our assessment that GSA and OPM had taken some steps to implement this practice.

Beyond these situations, the four agencies have not directly allocated other funds to meet the functional needs of their telework programs. Moreover, both Education and VA cited funding as a major barrier to their agencies' telework programs in their responses to OPM's November 2002 telework survey. Education's response also characterized telework as an unfunded mandate that agencies had to support with funds from their appropriations for salaries and expenses.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

Establishing a Pilot Program

Booz Allen Hamilton's April 2002 report on barriers to home-based telework stated that well-structured pilot programs have led to successful telework programs. Guidelines issued by Commuter Connections, a program coordinated through the Metropolitan Washington Council of Governments, suggests that a telework pilot program may be the best way to prove the concept and test the integration plan by demonstrating effects on performance and productivity, evaluating policies and procedures, testing remote access and technology support, identifying resource requirements, evaluating new workplace concepts, testing training effectiveness, and evaluating manager-team-remote worker relationships.[45] Of the four agencies we reviewed, only Education had a pilot related to the implementation of its agencywide telework program. Although GSA and OPM did not have individual pilot programs for their internal telework programs, both agencies were involved in the year-long governmentwide telework pilot program that was implemented in 1990.

In comments on a draft of this report, VA said that it had two pilot programs. However, when we requested documentation of a pilot relating to implementation of its current program, VA responded that, in fact, it did not conduct a pilot program for its current telework policy. Therefore, we did not change our assessment of VA on this practice.

Telework Policy

Establishing an Agencywide Telework Policy

OPM's January 2003 report to Congress stated that of the 77 reporting agencies, 63 reported having approved and implemented their telework policies, 9 were in the process of policy development, 3 were in the implementation stages, and 2 reported no policies or policy development activity. All 4 of the agencies in our study have implemented telework policies and, according to agency officials at all of these agencies, they have given some consideration to updating their policies to reflect changes within the agency and more recent trends in telework. At VA, a program official provided us with a draft for an updated policy, which was developed to modernize the agency's policy and expand the eligible

---

[45]Commuter Connections, *A Practical Approach to Implementing Telework Programs* (Washington, D.C.: 2002), 81.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

population at VA. According to this official, the draft policy was going through the approval process at that time. Program officials at all 4 of the agencies told us that revisions to their policies would involve obtaining union input on those revisions. Telework program officials at GSA and OPM said that reaching such agreement with the unions can take a year or more.

Establishing Eligibility Criteria to Ensure That Teleworkers Are Selected on an Equitable Basis Using Criteria Such as Suitability of Tasks and Employee Performance

Several telework-related sources have emphasized the need for eligibility criteria to ensure that teleworkers are selected on an equitable basis. Most of these sources advise that these criteria should be based on the suitability of both the tasks and the employee for telework. According to the Interagency Telework Issues Working Group report, criteria for determining the suitability of the employee should be based on objective criteria that are equitable, reasonable, and clearly stated and not on general personal characteristics that are assessed using subjective measures, such as being organized, conscientious, highly disciplined, and a self-starter. The report went on to say that using such criteria can lead to subjective supervisory assessments, which can inaccurately or inappropriately impede telework participation. To address this concern, the report recommended that OPM establish a policy that all federal employees are potentially eligible to participate in telework, unless excluded by their agency based on objective criteria that are supportive of the intent of the telework requirements in Public Law 106-346. The group also recommended that OPM require each individual agency to identify and define, in its telework policy, positions excluded from telework arrangements, based strictly on tasks performed in the excluded positions.

Education has included eligibility criteria in its policy that are similar to those that the Interagency Telework Issues Working Group cautioned against using. Education's policy states that an employee who is suitable to telework should exhibit self-starter characteristics, good organizational skills, and the ability to function independently. Education and OPM also require that teleworkers are performing at or above a specified rating level such as "fully successful." In addition, OPM's telework policy states that employees approved for telework should be able to manage workloads with minimum supervision and that generally, telework is not appropriate for new employees such as those who need to be in the office to learn the organization and those who require on-the-job training. GSA's policy does not include eligibility criteria, but states that criteria for selecting occupations and employees for telework are not hard and fast rules. However, the policy also refers to a separate GSA Office of Human

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

Resources document for selection factors particularly relevant to telework. A GSA program official said that she had been trying to locate that document for a while, but to date has not been able to do so. VA's current policy includes eligibility criteria based solely on position classifications. However, a VA program official acknowledged that there is variation in the application of eligibility requirements among parts of that agency, given the subjective nature of the approval process. She added that the proposed revisions to VA's current policy would require supervisors to give reasons for denial on the application form, which she hoped would provide needed information to help assess equitable treatment. Because none of the four agencies have yet taken steps to ascertain whether teleworkers are being selected on an equitable basis, these agencies cannot ensure that their eligibility criteria are being applied equitably.

Establishing Policies or Requirements to Facilitate Communication Among Teleworkers, Managers, and Coworkers

Although telework-related sources suggest that establishing policies or requirements to facilitate communication among teleworkers, managers, and coworkers is helpful in addressing managerial concerns about telework, teleworker isolation, and morale issues that may arise with nonteleworkers, two of the four agencies, Education and OPM, have fully implemented this practice. Education's telework policy states that supervisors should ensure that efforts are made to include teleworkers as part of the team in order to reduce employee isolation and communication problems, and to facilitate integration of the employee with those in the office. As a means of accomplishing this, the policy recommends that teleworkers plan to work from the office at least 1 day per week in order to be available for meetings or anything that needs to be handled face-to-face and on days when staff meetings are scheduled. The policy also suggests that developing fixed times during the day for supervisor/employee telephone conversations may be helpful to ensure ongoing communication. OPM's policy also includes language about the importance of communication and recommends that employees plan to be in the office at least 1 day per week. In addition, OPM's policy states that the telework agreement must include means of communication with the employee when telecommuting (phone, fax, e-mail, etc.). OPM's alternate worksite agreement includes an area specifically addressing assignments and communication. It says that the information provided in the designated space "should include work assignments, agreements on checking voice mail and email or contacting the supervisor as well as the requirement for employees to come into the office as needed." While program officials at GSA and VA acknowledged that communication was an important issue,

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

the telework policies at these agencies did not establish means of facilitating communication.

Developing a Telework Agreement for Use between Teleworkers and Their Managers

Telework-related literature recommends that agencies develop a telework agreement to be signed by both teleworkers and their supervisors. According to ITAC's *e-Work Guide*, such an agreement should establish job duties and expectations, performance standards, and measurable outcomes and deliverables. All four agencies reviewed have developed telework agreements, but have different requirements for their use. For example, GSA does not require the use of these agreements for ad hoc telework arrangements. In contrast, OPM's telework policy states that "employees must sign a work agreement with their supervisor." Despite this requirement, an OPM program official told us that this does not always happen in practice and she does not require them to do so. However, she does accept e-mail agreements between employees and supervisors when she receives them.

Developing Guidelines on Workplace Health and Safety Issues to Ensure That Teleworkers Have Safe and Adequate Places to Work Off-Site

Telework-related literature describes several means for employers to ensure that teleworkers have safe and adequate alternate workplaces. These include specifically addressing health and safety issues related to telework in policies, including health and safety issues in telework training, having teleworkers fill out a safety checklist, and performing on-site inspections with adequate notice to the teleworker. Three of the four agencies we reviewed, Education, GSA, and OPM, have developed safety checklists, which are to be completed along with the telework agreement, to ensure that teleworkers have certified the safety of their alternate workplaces. However, Education is the only agency that requires all teleworkers to complete and sign such a checklist before they begin teleworking. GSA includes a safety checklist with the telework agreement, but episodic teleworkers are not required to complete an agreement or, therefore, a checklist. OPM's telework policy recommends that the telework agreement include a safety checklist, but such a checklist is not required. According to a program official from VA, the agency's current policy does not contain health and safety guidelines, but the revised draft policy, which is currently going through the agency's approval process, includes a safety checklist.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

Performance Management

Ensuring That the Same Performance Standards, Derived from a Modern, Effective, and Credible Performance System, Are Used to Evaluate Both Teleworkers and Nonteleworkers

Although none of the agencies have fully implemented the practice of ensuring that the same performance standards are used to evaluate both teleworkers and nonteleworkers, Education and OPM have taken some steps to implement this practice. Education's telework policy states that employees participating in the telework program shall be treated equally with other employees in decisions that affect conditions of employment for awards, promotions, and/or any other condition of employment. A program official at OPM said that work performed by teleworkers is supposed to be evaluated using the same performance standards used for nonteleworkers and that managers are supposed to communicate this. Although such a statement was not included in OPM's telework policy, the policy does state that the employees' current performance standards will be used to govern all telecommuting assignments as well as those in the telecommuters' current traditional federal offices. A GSA program official told us that the agency incorporated this concept into its telework policy and reiterated it in counseling sessions with managers and staff. We did not find any support of this in GSA's policy, although it did indicate that "[t]ime spent and quality of products will be measured by correlation with previous and similar efforts." VA's current telework policy does not contain any statements related to using the same performance standards for both teleworkers and nonteleworkers. In comments on a draft of this report, VA stated that the department consistently advises supervisors and managers that performance standards for teleworkers and nonteleworkers should be the same. However, VA could not provide us with any information to support this comment. In fact, VA responded that it provides such advice "on an as-requested basis," which does not constitute "consistently advising." Therefore, our assessment of VA on this practice remains unchanged.

Establishing Guidelines to Minimize Adverse Impact on Nonteleworkers Before Employees Begin to Work at Alternate Worksites

Telework-related literature suggests that performance and morale issues can arise if guidelines are not established to address and minimize adverse impacts of telework on nonteleworkers. The literature describes several issues that can contribute to such issues among nonteleworkers, including eligibility criteria that are perceived as unfair and cause nonteleworkers to feel left out or discriminated against, teleworkers that allow their in-office

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

responsibilities to fall on the shoulders of nonteleworkers, and reduced communication between the teleworker and nonteleworker. To mitigate these situations, care should be taken to establish fair and equitable eligibility criteria and means of distributing work.

Three of the four agencies, Education, OPM, and VA, have fully implemented this practice by including specific guidelines in their policies. Education's telework policy states that telework should not affect the performance of other employees and that it shall not put a burden on staff remaining in the office. It also says that an equitable distribution of work must be maintained and methods should be instituted to ensure that employees working in the office do not have to handle the teleworker's work. OPM's policy says that supervisors should consider the effect of telework on all employees in the work unit, especially if it means there are fewer employees in the office to handle customer requests. At VA, supervisors are charged with ensuring that participating and nonparticipating employees are treated equitably. According to a program official at GSA, the agency's policy sets out guidelines for effective use of telework, including that a unit should use whatever systems it deems necessary to ensure that there is a balance of work between those teleworking and those in the office. However, we did not see any support of this in GSA's policy.

Managerial Support

Obtaining Support from Top Management for a Telework Program

Although program officials from all four agencies recognized support from top management as being critical to the success of a program such as telework, a program official at OPM was the only one to state, unequivocally, that telework has the full support of that agency's top management. She said that the agency's director leads by example, since she and various members of her staff telework. The director has also demonstrated support by sending e-mails encouraging telework in response to certain events, such as Green Day. A GSA program official believes support for telework from that agency's top management has varied by administration. However, she said that, although the current administrator has not made a statement specifically supporting telework, he has made several overtures in support of the program, including teleworking occasionally himself, supporting GSA's promotional free trial offer for use of the telework centers, and attending meetings related to

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

telework. Officials at the other two agencies cited lack of support from top management as a challenge in implementing the telework program. An Education program official also specifically discussed the difficulties that frequently changing administrations and leadership can create because of having to repeatedly work to overcome the barriers that new top managers bring to the agency.

Addressing Managerial Resistance to Telework

Our 1997 report identified managerial resistance as the largest barrier to implementing telework, attributing it to several factors, including general resistance to change, since telework requires managers to shift from managing by observation to managing by results.[46] Officials from three of the four agencies that we spoke with—Education, GSA, and VA—also cited this as a challenge that they face and identified it as a barrier to telework in their responses to OPM's November 2002 telework survey. Current and former program officials at OPM stated that managers at that agency do not exhibit signs of managerial resistance to telework and thus this practice has been fully implemented. A former program official directly linked the presence of top management support for telework at OPM to the prevention of managerial resistance, because managers were told that they have to allow telework and that they must give a business case for rejecting an employee's request to telework.

Program officials at two of the agencies presented some ideas for addressing managerial resistance. A VA program official would like to bring in outside consultants to hold an information forum or educational briefings for supervisors and managers, which would tie telework to the shift from the industrial age to the information age and walk managers through the process of approving a telework arrangement. VA's draft Telework Proposal form, included in its revised draft telework policy, will help to address managerial resistance, if it is implemented in its current form, by requiring that supervisors provide a written reason if a telework application is not approved. In its response to OPM's 2002 telework survey, VA also said that it is using initiatives to gain top management support to overcome barriers that include managerial resistance. According to a program official, GSA has considered handling the approval process for telework agreements by committee instead of by individual supervisors as

---

[46]GAO/GGD-97-116, 14.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

a means of alleviating managerial resistance, but this has not yet happened because of managerial resistance to such a change.

Training and Publicizing

Training All Involved, Including, at a Minimum, Managers and Teleworkers

Three of the four agencies that we reviewed provide some telework training. At Education, training for teleworkers is mandatory before they can begin to telework. Training is available at monthly training sessions, by telephone, or by requesting the telework coordinator's training slides. These training opportunities are also available, but optional, for managers and nonteleworkers. GSA's telework policy states that new program participants, including employees and immediate supervisors, must receive training except for those participating in episodic arrangements. However, a program official said that while GSA trained all employees when its telework program was first implemented, currently the agency only does occasional briefings on the telework program, usually in town hall meetings or on an as-needed basis with individuals.

A former program official at OPM told us that all managers were required to attend telework briefings when the program first started in 2001. These sessions addressed performance management, office coverage and work unit issues, equipment issues, providing business reasons for denials, and handling Privacy Act implications. Other employees were offered the opportunity to attend briefings about the roles and responsibilities of a teleworker, but they were not required to attend. However, a current OPM program official told us that the agency does not currently offer telework training, that there has been no discussion of offering such training, and that she does not see a need for it at this time.

Although a program official at VA believes training is very important and is critically needed for supervisors and new employees, she said that telework training has never been done at the agency. She noted that VA has considered developing an interactive training program for supervisors, but it is waiting for the release of an Internet training package that OPM's office with responsibility for the governmentwide telework initiative has developed before making any decisions. It is anticipated that this training for managers and teleworkers will be available to all federal government employees from OPM during fiscal year 2003 at no charge on

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

www.golearn.gov—an OPM-provided on-line learning center. The availability of such training may help to address any disparity in the provision of telework training among agencies.

Informing the Workforce about the Telework Program

Telework-related literature suggests that it is important to inform the workforce about opportunities to telework. Two of the agencies, GSA and OPM, have fully implemented this practice for their internal telework programs, using means such as intranet sites, newsletters, posters, and brochures to disseminate information about the telework program. At Education, a program official told us that she stopped actively marketing the telework program in response to pressure from top management. However, Education's internal Web site has information on telework, including forms for participation and e-mail links. Education also publicizes information about telework training opportunities in its internal weekly newsletter. A program official from VA indicated that she would like to do more to market the program, but is limited by budgetary constraints. Currently the only means of publicizing VA's telework program is through its intranet site, which includes a copy of the telework policy, helpful hints for supervisors and employees, information about telecenters, telework questions and answers, and guidance about what would make a good teleworker. However, the program official acknowledged that this form of communication has a drawback in that only those employees with access to computers can retrieve this information.

Technology

Conducting an Assessment of Teleworker and Organization Technology Needs

Since teleworkers often require the use of IT equipment to access files, internal networks, and e-mail, the Environmental Protection Agency (EPA) suggests that agencies assess both their own and their employees' technology needs for telework with a mind toward providing employees with access to equipment similar to what they have in the office.[47] In addition, ITAC's *e-Work Guide* reports that research conducted by the American Management Association found that 73 percent of "highly

---

[47]Environmental Protection Agency, *Telecommuting/Telework Programs: Implementing Commuter Benefits Under the Commuter Choice Leadership Initiative* (Washington, D.C.: Sept. 2001), 8.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

successful" telework programs regarded it as "critical" to do an analysis and review of the organization's technology base and its compatibility with teleworker requirements. According to Booz Allen Hamilton's report on technology barriers to home-based telework, the technologies acquired in response to such assessments, including document management systems, collaboration tools, and performance measurement systems, can result in benefits for both teleworkers and those in the office environment as well.

Two of the four agencies we reviewed, Education and OPM, have fully implemented this practice and GSA has partially implemented the practice. According to an IT official at Education, the department did an engineering analysis to determine both current and future infrastructure needs for telework. In addition, a program official from Education told us that each applicant for telework must complete a technology assessment worksheet. OPM conducted a technology assessment as part of its program planning. As part of this effort, OPM's IT staff chose the technologies to be used for remote access and decided that government-issued equipment was preferred to personal equipment for security purposes. OPM's IT department also distributes virus software to employees who use their personal computers for telework. GSA has not conducted an agencywide assessment of teleworker and organization technology needs. According to a GSA program official, this is done on a case-by-case basis at the organization level because each organization is responsible for its own budget and for providing its workers with the appropriate tools for doing the job. According to another GSA official, GSA's Office of Governmentwide Policy is conducting a pilot with laptops and docking stations to minimize the agency's costs of maintaining two workstations for teleworkers. According to an IT official, VA has not conducted an assessment of technology needs with respect to teleworkers. As it currently stands, the process at VA is handled individually between the supervisor and employees.

Developing Guidelines about Whether the Organization or Employee Will Provide Necessary Technology, Equipment, and Supplies for Telework

Guidelines issued by GSA for the governmentwide telework initiative indicate that, while agencies are permitted, but not required, to provide teleworkers with equipment for use at alternate worksites, each agency must establish its own policies on the provision and installation of equipment for telework. All of the agencies we reviewed have established policies in this regard, stating that the agency will make decisions about providing equipment for telework on a case-by-case basis in light of funding and other considerations, such as the work to be performed at the alternate site, the type of equipment and software that is needed, and the availability

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

of equipment. For those agencies that allow employees to use personal equipment for telework, one program official acknowledged that such a policy can result in a "digital divide" between those employees who have the option of using or acquiring personal equipment for telework when the agency is not able to provide them with equipment and those who do not have such equipment available to them.

Providing Technical Support for Teleworkers

According to the Interagency Telework Issues Working Group report, establishing technical support for both government-owned and personal equipment used to perform official duties for remote users, especially for teleworkers, is a relatively new issue for agencies. Some concerns associated with this issue focus on the availability and consistency of such support for teleworkers. To address these concerns, the report recommends that GSA establish a policy requiring that telework arrangements are covered in each agency's IT technical support policies and that agencies refer to relevant sources of information on technical support in their telework policies.

All four of the agencies reviewed have fully implemented this practice. According to an IT official at Education, the same technical assistance is available to all Education employees, whether they are in the office or teleworking. There is no special technical support for teleworkers. A program official from Education also said that customer service center staff can provide technical support for nongovernment-owned equipment, but this support is limited to whatever help can be provided over the telephone. An IT official at GSA said that the agency has two levels of technical support for users. The first level of technical support for all users, regardless of where they are working, is from their own unit's support staff. The second level of support for remote access users, including teleworkers, is the Remote Access Team in the Chief Information Officer's office. This level of support is called upon when the first level cannot resolve the problem. According to an IT official at OPM, the agency has a telework group that manages the servers, the virtual private network, and communication software. There is a separate phone number for people to call with computer problems associated with personal or agency-provided computers encountered while teleworking. At VA, teleworkers have remote access to the same technical support as office-based workers.

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

Addressing Access and Security Issues Related to Telework

The Interagency Telework Issues Working Group report states that remote access is a key component of telework programs, because "low-tech" solutions, such as floppy disks, are inadequate for most situations. It goes on to say that remote access solutions, especially the speed of the connection, are necessary to maintain productivity in a telework arrangement. However, both the Interagency report and Booz Allen Hamilton's report on technology barriers to home-based telework identified concerns among managers about security and the protection of agency information when systems are accessed remotely. Although the Booz Allen Hamilton report stated that the need to provide information security was not seen by any of the organizations they analyzed as a reason to inhibit home-based telework, OPM's January 2003 report to Congress on the status of telework in the federal government identified data security as the most frequently cited barrier to telework. All four of the agencies we reviewed said they had addressed access and security issues related to telework by using remote access systems with adequate safeguards.

Establishing Standards for Equipment in the Telework Environment

Booz Allen Hamilton's report on technology barriers to home-based telework recommends that federal organizations specifically define technical requirements, or standards, for the home environment to ensure that sufficient systems and support services are available to teleworkers. According to the report, such requirements should also be included in the longer-term IT and capital planning processes at each agency. Three of the four agencies we reviewed, Education, GSA, and VA, have fully implemented this practice and OPM has taken some steps to implement this practice.

According to IT officials at both Education and GSA, these agencies use the same standards for equipment in both the home and office environments. Neither agency has established separate standards for equipment in the telework environment. If an employee wants to use his own equipment at home, the equipment would have to meet the network standards. According to a program official at Education, the department's Web site identifies the minimum technology requirements and is regularly updated with the latest information on viruses, security issues, and other information. According to an IT official at VA, the department has established a standard for its IT equipment, whether at a VA locale or not. This official reported that all IT investments and procurements are required to undergo review and concurrence from VA's Enterprise Architecture Service. In addition, the draft policy includes a security checklist,

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

including security requirements for equipment, which must be completed, reviewed, and certified by the Information Security Officer before a telework arrangement can begin.

OPM has taken some steps to implement this practice. In comments on a draft of this report, OPM stated that it has a standard platform for connectivity and has established a protocol for requesting necessary equipment and connectivity. However, an IT official from OPM reported that, while OPM has a target standard machine, this standard has not been fully applied. In addition, this IT official also told us that OPM does not really have a standard for employee-provided equipment and that employees are only made aware of the need to upgrade to the standard when they raise an issue about their current equipment.

Program Evaluation

Establishing Processes, Procedures, and/or a Tracking System to Collect Data to Evaluate the Telework Program

Even though the four agencies we studied have processes and procedures to collect data on their telework programs, none of them currently does a survey specifically related to telework or has a tracking system that provides accurate participation rates and other information about teleworkers and the program. Such lack of information not only impedes the agencies in identifying problems or issues related to their telework programs, it also prevents these agencies from providing OPM, and subsequently Congress, with complete and accurate data.

Education's process to collect data provides some useful information, but it is not complete. To compile information on telework at Education, a database was developed, which uses information from telework agreements and the department's payroll system. Using this database, Education can produce reports on a number of topics, including the number of teleworkers, whether they telework on a regularly scheduled or ad hoc basis, what regions or offices they work for, who their supervisors are, and their grade levels. However, an Education program official acknowledged that although this system is designed to track telework agreements, some agreements are not accounted for, such as informal agreements that are unbeknownst to her or agreements that have not gone through the whole process. Furthermore, because it tracks agreements and not actual usage, the system cannot measure telework utilization. VA currently does not have a database for telework and uses decentralized

Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices

data collection methods, but a program official indicated that the agency plans to implement telework tracking via the time and attendance system. Although this official said that she hopes this new tracking system will address data inconsistency issues within the agency, she could not provide a time frame for its implementation.

OPM tracks its teleworkers by counting telework agreements and recently developed a database to keep track of these agreements, although a program official acknowledged that informal e-mailed telework agreements that are sometimes used at OPM might not all be included in the database because she did not receive them. As stated above, systems that rely on agreements to track telework participation do not actually provide information about utilization rates. At OPM this weakness is compounded by the fact that the agency does not ensure that telework agreements are used in all cases. GSA does not have an agencywide tracking system. Coordinators for individual units at GSA calculate telework data from telework agreements once a year in order to provide the information GSA submits for OPM's annual governmentwide telework survey. However, no documentation is required for intermittent telework arrangements at GSA, and, as a result, a program official acknowledged that the number of these types of arrangements reported to OPM for its 2002 telework survey was a rough estimate. She also said that the survey instruments and reporting mechanisms used by OPM's governmentwide telework initiative for its annual report on telework in the federal government were a challenge in this area because of changes in the data requested from year to year, which made it difficult to determine the kind of system an agency needed to develop to best track the requested data.

Identifying Problems and/or Issues with the Telework Program and Making Appropriate Adjustments

ITAC's *e-Work Guide* recommends that organizations choose an evaluation design that 1) allows the clearest judgment of the program's effectiveness and 2) uses the evaluation results to develop an action plan to guide any necessary changes for telework or for the organization. It states that organizations should use reliable and valid measures of all outcomes and processes, including benchmarking and follow-up assessment questionnaires, interviews, behavioral observations and ratings, or organizational data, because the quality of measurement is extremely important to enabling one to draw the proper conclusions regarding the effectiveness of telework and whether or not it has met the original objectives.

**Appendix II
Descriptions of Efforts by the Selected
Agencies to Implement the 25 Key Practices**

Despite the importance of using data to evaluate and improve telework programs, none of the four agencies we reviewed had fully implemented this practice. A program official at Education told us she had collected data on the telework program and used these data to identify some potential problem areas. For example, she identified offices that had low telework program participation rates and an office that had teleworkers working only on an as-needed schedule and no one working on a fixed schedule. She used this information to target marketing efforts until she was told to stop actively marketing the program. In addition, a private contractor conducted a survey about Education's telework program in 1999. Although the survey's response rate was very low due, in part, to technology incompatibilities across the department and a lack of support by union officials, the survey yielded four recommendations, none of which have been fully implemented. According to a GSA program official, GSA does not collect data to identify problems or make adjustments to its telework program.

An OPM program official stated that she does not use the telework data she collects to identify issues with the program. Rather, she relies on employees to bring problems to her attention and responds accordingly. At VA, a program official identified an issue with the data collected for OPM's 2003 report to Congress on the status of telework. She believed the data collected within VA was inconsistent and needed to be reexamined. For example, 102,000 positions were identified as being eligible for telework for the January 2003 report, as opposed to 80,000 that had been identified for the January 2002 report. Since the program official thinks VA's true eligible population is between 55,000 and 75,000 employees, she asked the local human resources representatives to reexamine the numbers they reported.

Comments from the Department of Education

The Director of Human Resources Services from the Department of Education provided comments on a draft of this report via e-mail. In these comments, Education generally agreed with the contents of the draft report and stated that the department was pleased that we recognized its efforts to advance telework. Additionally, the comments stated that the department's "most significant comment" was, as our draft noted, the need for a clear, unambiguous, and universally accepted definition for what it means to allow employees the opportunity to telework.

Comments from the Department of Veterans Affairs

THE SECRETARY OF VETERANS AFFAIRS
WASHINGTON
June 20, 2003

Mr. J. Christopher Mihm
Director, Strategic Issues
U. S. General Accounting Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Mihm:

The Department of Veterans Affairs (VA) has reviewed your draft report, **HUMAN CAPITAL: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts** (GAO-03-679). VA is pleased to see that telework has been recognized as a human capital flexibility.

See comment 1.

VA agrees with the General Accounting Office's (GAO) conclusion that there is a need for further guidance and assistance from the two lead agencies, the General Services Administration (GSA) and the Office of Personnel Management (OPM). Section 359 of the Department of Transportation and Related Agencies Appropriations Act for 2001 (P. L. 106-346) requires each Federal agency to establish a policy under which eligible employees may participate in telework. However, the definition for eligibility criteria is not clear. Although OPM issued a revised definition for opportunity to participate, the revision does not address the larger issue of participant eligibility. In VA's opinion, the decision to participate should be predicated on position suitability with specific focus on tasks and responsibilities, followed by employee suitability. For example, if the employee is an outstanding candidate but the position and responsibilities do not lend themselves to a telework agreement, the request to participate in telework would not be approved. VA strongly believes that OPM needs to redefine participant eligibility criteria.

See comment 2.

The report states that VA was included in the review because it had the distinction of being the second largest Chief Financial Officers (CFO) Act agency combined with its having the lowest reported telework utilization rate among the CFO Act agencies. However, the report does not recognize that the Department's limited participation rate is due in large part to VA's mission. A significant number of VA employees are engaged in direct patient care and benefit service delivery to veterans, which precludes large-scale participation in telework. Therefore, using VA's total employee population for reporting purposes, rather than the number of positions that may be suitable for telework, does not adequately describe VA's participation rate.

See comment 1.

GAO asserts that telework ". . .also allows management and employees to cope with the uncertainties of potential disruptions in the workplace, including terrorist attacks." VA agrees and believes OPM and GSA should provide guidance delineating

2.

Mr. J. Christopher Mihm

respective responsibilities among Federal, State, and local governments on how to
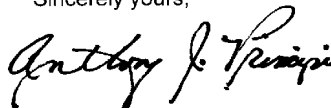effectively use telework in emergency situations.

On page 17, there are several factual errors regarding the extent to which VA
has implemented the 25 key telework practices.

See comment 3a.

- Program Planning - VA has conducted pilot programs, e.g., the Veterans Benefits
  Administration (VBA) and the Board of Veterans' Appeals. During the course of
  the audit, VA forwarded a copy of VBA's pilot to GAO.

See comment 3b.

- Program Planning - VA has also established measurable telework program goals
  and an implementation plan.

See comment 3c.

- Telework Policy - VA has included in its revised policy a "Self-Certification Safety
  Checklist."

See comment 3d.

See comment 3e.

See comment 3f.

See comment 3g.

VA has also developed a Telework Proposal form designed to facilitate
communication among supervisors, employees, and managers. The Telework Proposal
form allows VA to track and evaluate the effectiveness of its program as well as VA's
success in achieving targeted participation goals. The Department consistently advises
supervisors and managers that performance standards for teleworkers and non-
teleworkers should be the same, which is consistent with the criteria under "Performance
Management." Under "Technology," VA's ability to conduct an assessment is
compromised by the lack of clear guidance regarding which positions are suitable to
telework.

The Department of Veterans Affairs appreciates the opportunity to comment on
your draft report.

Sincerely yours,

Anthony J. Principi

GAO Responses to Comments from VA

1. VA agreed with our conclusion that there is a need for further guidance and assistance from GSA and OPM regarding federal telework implementation and suggested two areas where such guidance would be helpful. Specifically, VA indicated that OPM needs to redefine participant eligibility criteria and that OPM and GSA should provide guidance on how to effectively use telework in emergency situations.

2. VA expressed concern that the draft report, which stated that we used participation rate as one of the criteria used in our selection of agencies, did not recognize what VA considers to be a significant factor accounting for its limited telework participation rate. In this regard, VA stated that a "significant number of VA employees are engaged in direct patient care and benefit service delivery to veterans, which precludes large-scale participation in telework." As our draft noted, agencies were selected to provide illustrative examples of the extent to which individual agencies with varied sizes, reported utilization rates, and missions had implemented the key practices identified in our literature review. Nonetheless, we have added additional language to our scope and methodology section regarding the service delivery focus of VA's mission.

3. VA also had several comments on our findings related to the status of VA's implementation of the telework practices that we identified. The specific issues that VA raised and our response to each are summarized as follows:

   a. In its comments, VA noted that it had conducted two pilot programs. When we requested additional information from VA to support its comment, VA provided us with information about two pilot programs that did not relate to their current telework program. VA also stated that it did not conduct a pilot program for its current telework policy. Because VA could not provide information about a pilot program for its current telework policy, we did not change our assessment that VA has not taken any steps to implement this practice.

   b. VA said it had established measurable telework program goals and an the course of our work that VA did not have any measurable telework goals or an implementation plan. Therefore, we have not changed our assessment that VA has not taken any steps to implement these practices.

c. VA commented, as our draft report had noted, that its revised telework policy has a "Self-Certification Safety Checklist." However, as we also noted in our draft report, this policy is still in draft form and was not in use during our review. Because VA's current telework policy does not contain a safety checklist and the draft checklist is not in use, we have not changed our assessment that VA has not taken any steps to ensure that teleworkers have safe and adequate places to work off-site.

d. VA indicated that it had developed a Telework Proposal form that was designed to facilitate communication among supervisors, employees, and managers. However, that form is part of VA's revised telework policy, which, as noted in our draft report, has not yet been approved for use at VA and, therefore, was not considered in our evaluation. Moreover, this form, once approved, will not serve to establish policies or requirements to facilitate communication between managers and teleworkers, such as detailing the methods of communication that should be used or the frequency with which communication should occur while teleworking. More importantly, VA's existing telework policy does not establish such policies or requirements to facilitate communication. Given these considerations, our assessment that VA has not taken any steps to implement this practice remains unchanged.

e. VA stated that the Telework Proposal form, which, as we noted, is still a draft, allows it to track and evaluate the effectiveness of its program as well as VA's success in achieving targeted participation goals. This form simply allows VA to count how many employees have applied for telework and how many have been approved for such an arrangement. Such information will be important and valuable. However, the form would not fully enable VA to evaluate the effectiveness of its program or its success in achieving participation goals in terms of the number of employees actually teleworking and, equally important, the extent to which telework is being used. As we had noted in our draft report, a VA program official had indicated to us that the agency plans to implement telework tracking via the time and attendance system, which she hopes will address data inconsistency issues within the agency. Such a tracking mechanism, if implemented, could be helpful in tracking telework participation. Based on these considerations, our assessment that VA has taken some steps to implement this practice remains unchanged.

f. VA also stated that the department consistently advises supervisors and managers that performance standards for teleworkers and nonteleworkers should be the same and said that this was consistent with the criteria under our category of "Performance Management." However, VA could not provide us with any information to support this comment. In fact, VA responded that it provides such advice "on an as-requested basis," which does not constitute "consistently advising." Furthermore, VA's current telework policy does not contain any statements related to using the same performance standards for both teleworkers and nonteleworkers. Given these considerations, we have not changed our assessment that VA has not taken any steps to ensure that the same performance standards are used to evaluate both teleworkers and nonteleworkers.

g. In addition, VA noted that its ability to conduct a technology assessment for telework is compromised by the lack of clear guidance regarding which positions are suitable to telework. This further illustrates our finding, as stated in our draft report, that agencies may need additional guidance, guidelines, and/or individualized technical support to fully implement the practices we have identified. However, VA's comment does not affect our assessment that VA has not taken any steps to implement this practice.

Comments from the General Services Administration and the Office of Personnel Management

Note: GAO comments
supplementing those in
the report text appear
at the end of this
appendix.

UNITED STATES
OFFICE OF PERSONNEL MANAGEMENT

UNITED STATES
GENERAL SERVICES ADMINISTRATION

WASHINGTON, DC

JUN 2 6 2003

OFFICE OF THE DIRECTOR

OFFICE OF THE ADMINISTRATOR

GSA

The Honorable David M. Walker
Comptroller General of the United States
The U.S. General Accounting Office
441 G Street NW, 7th Floor
Washington, DC 20548

Dear Mr. Walker:

Thank you for the opportunity to respond to the General Accounting Office's (GAO) recent
report regarding the progress of Federal agencies in utilizing telework. The General Services
Administration (GSA) and the Office of Personnel Management (OPM) believe that this is a
sufficiently important issue as to merit a joint response.

In the June 2003 draft report, *Further Guidance, Assistance, and Coordination Can Improve
Telework Efforts*, the General Accounting Office (GAO) offered several recommendations
concerning the need for further guidance and assistance from OPM and GSA, if we are to
continue making progress on this important government-wide initiative. We have commented on
each of the specific suggestions below. The response to GAO's evaluation of the OPM and GSA
internal implementation of the telework program is provided at Appendices A and B.

See comment 3a.

The draft GAO report notes confusion at the implementation level regarding the policy guidance
we have put forth to date. We were particularly taken aback by this finding, given the efforts we
have made in promoting telework. For example, other GAO reports highlight positive results
with regard to OPM's stewardship of Federal work-life programs, including telework. The 9-
May-03 report, *Human Capital: OPM Can Better Assist Agencies in Using Personnel
Flexibilities* (GAO-03-428) states: "According to the agency officials and union representatives
we interviewed, existing flexibilities that are most effective in managing the workforce are work-
life policies and programs, such as alternative and flexible work schedules, transit subsidies, and
child-care assistance." Issued just a month ago, the report goes on to note that OPM "held one-
on-one meetings with more than 30 agencies to discuss telework, learn about agency initiatives
in this area, and find out how OPM can assist agencies in expanding telework opportunities."

See comment 3a.

Moreover, we have found that utilization of GSA's metropolitan Washington, D.C., telework
centers has increased by more than 60 percent. The joint GSA/OPM web site
(www.telework.gov) has achieved great success since going live in August 2001. To date, more
than 3,000 customers have signed up for GSA's telework list serve as a result of these efforts. In
the June report, GAO found a lack of clarity in OPM's telework guidelines regarding the legal
definition of "opportunity to telework," and that the lack of clarity resulted in inconsistent
agency reporting to OPM and Congress. As a result, OPM has issued immediate clarification in
Telework: A Management Priority – A Guide for Managers, Supervisors, and Telework

06/03

JUN 27 REC'D

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

The Honorable David M. Walker   2

Coordinators, on the Frequently Asked Questions (FAQs) on the telework web site, and in the upcoming 2003 telework survey. OPM did this to ensure that the agencies clearly understand the definition, and as the report acknowledges, the clarified definition should now be properly applied by agencies in reporting data to OPM.

See comment 3b.

The GAO report also asserts that although both GSA and OPM have policy responsibility for telework, they have not fully coordinated efforts in the past. We strongly disagree with this statement. OPM and GSA work together as a team while recognizing our respective areas of responsibility. However, with the February 20, 2003, passage of Section 623, Division B, Title V of Public Law 108-7, we revisited those areas of responsibility and concluded that they needed to be clarified to reflect new statutory direction. We had already begun that process and recognized the need to better outline separate and shared responsibilities. Among the options we are currently considering is a Memorandum of Understanding to clearly designate each agency's roles and responsibilities.

See comment 3c.

In addition, we have found a number of inaccuracies in the June report that were cited as indicators of a lack of coordination between our two agencies. For example, GAO asserts that when OPM asked GSA to review the OPM draft telework guide for managers, OPM revised the document without sharing the final draft with GSA before its release. Since OPM incorporated GSA's comments into the final guide, it was unnecessary to re-coordinate the document prior to release.

See comment 3b.

The report also states that there are unresolved disagreements between OPM and GSA on telework policy issues concerning dependent care and emergency closing of government offices. There are no such disagreements; rather, OPM and GSA have addressed different facets of these specific situations. While the responses were not in conflict, they have been clarified to avoid any confusion.

See comment 3d.

Similarly, the GAO report noted that GSA had expressed concerns about OPM's changes to the joint OPM/GSA web site. According to GSA's senior program executive for telework, that finding is simply inaccurate; both agencies continue to actively and successfully collaborate on www.telework.gov.

See comment 3e.

Finally, the report asserts that OPM refused to post the Interagency Telework Issues Working Group (ITIWG) Report on www.telework.gov because it raised unresolved issues relating to the program. This is factually incorrect. GSA and OPM jointly determined that it would be inappropriate to post a pre-decisional report of a working group on www.telework.gov until the two agencies with primary responsibility for the activity had an opportunity to analyze its findings, address issues contained therein, and fully consider all recommendations. We have begun that process. However, OPM and GSA continue to believe that posting of the ITIWG report on www.telework.gov before we have concluded that process is premature.

See comment 4k.

One recommendation of the ITIWG report was that OPM require all Federal agencies to establish a common system for collecting the data used in the annual report to Congress on the

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

The Honorable David M. Walker   3

status of telework in the Federal Government. OPM has concluded from research that the best
telework data is collected through time and attendance tracking systems. OPM will be issuing
guidance to agencies later this year on the use of this data source for its next survey.

Based upon OPM's government-wide leadership role in telework, and as GAO points out, OPM
received an FY 2003 appropriation to fund training for those agencies with less than two percent
telework participation. Implementation plans are well underway. During FY 2003, OPM will
launch a free e-training telework module for Federal managers and employees available on
www.golearn.gov. This summer, OPM will be conducting focus groups for managers in four
locations across the country. The focus groups will be designed to identify reasons why some
managers resist permitting telework. OPM will use the focus group data to tailor agency
telework training. OPM plans to train the agencies' Human Resources Directors and telework
coordinators and provide them promotional telework materials.

See comment 1.

Although the "Key Telework Practices for Implementation of Successful Telework Programs"
that GAO cites in the report are generally known (for example many have been included in
previous OPM and GSA issuances), we will include GAO's list with those already incorporated
into the training. We will also provide the GAO checklist to agencies and recommend that they
self-assess their telework programs using the GAO analytical framework. Both GSA and OPM
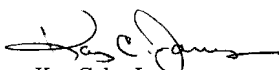will offer to help agencies to improve in the identified areas of deficiency.
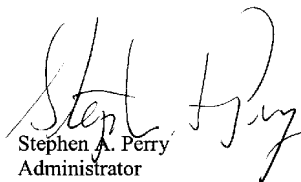
See comment 2.

GAO recommends the GSA Administrator work with Congress to determine what was meant by
the phrase "GSA telecommunications center" in Section 314, Division F, title III of
Pub.L.No.108-7 and whether there is a conflict with the provision contained in 40
U.S.C.587(d)(2) and issue guidance to relevant agencies once determinations are made. GSA
will coordinate internally and with the appropriate congressional committees to resolve the
conflicting language in the aforementioned statutes and then provide clarification to our
customer agencies.

See comment 1.

To that end, OPM and GSA's joint support of the telework program will continue to increase
awareness and usage of this important resource. It is clear we all agree on the importance of
telework and encouraging its usage in the Federal Government. We assure you we will continue
to champion telework a key human capital flexibility and do everything possible to facilitate its
acceptance and use.

Sincerely,

Kay Coles James
Director

Stephen A. Perry
Administrator

Appendices

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

Appendix A

Comments on GAO Draft Report re OPM's Internal Telework Program

See comment 4.

This purpose of this document is to respond to GAO's Draft Report *Human Capital: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts.* GAO identified 25 key practices in telework-related literature and other sources as those that Federal agencies should implement in developing their individual telework programs. GAO indicated that 12 of those key practices still need to be implemented in OPM. Comments that reflect our view of these assessments are provided below for each of those practices.

The categories are <u>**UNDERLINED**</u>, the practices are in *italic* text, and comments are in normal text. Each comment listed was conveyed to GAO during the interview process.

CATEGORIES AND PRACTICES

<u>PROGRAM PLANNING</u>

See comment 4a.

Establish measurable telework program goals.

> GAO indicated that OPM has not taken any steps to implement this practice. This is inaccurate. OPM has met the requirements of section 359 of Public Law 106-346 stating that the section's requirements are to be applied to 25% of the federal workforce by April 2001 and to an additional 25% of the workforce each year thereafter. In effect, the legislation has provided the program goals for Federal agencies through 2004. For 2001 and 2002, OPM has exceeded these program goals, and we fully expect to meet or exceed these goals in 2003 and 2004. Therefore, measurable telework program goals have been established for OPM.

See comment 4b.

Develop a business case for implementing a telework program.

> OPM's Governmentwide guidance states that it is a business imperative that Telework be adopted to achieve mission goals. During training sessions for our managers, OPM stated that business needs are the driver for Telework implementation. Specifically we highlighted Telework's benefits towards reducing sick leave, improving morale and productivity, and aiding in retaining and recruiting high quality employees. In addition, we refer our managers to the OPM/GSA Telework website where the guidance on a business case for Telework is available. Therefore, the business case for implementing Telework has been developed.

See comment 4c.

Provide funding to meet the needs of the telework program.

> GAO indicated that OPM has taken "some" steps to implement this practice. This is inaccurate. OPM earmarks specific funding each year to support telecenter usage ($50,000 in FY 2003). In addition, OPM has identified resources that have allowed us to accommodate <u>every</u> employee (who is otherwise eligible and wants to telecommute) with appropriate computer equipment, technology support, and remote connections. In addition, the agency funds staff time to provide oversight

1

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

and evaluation for the telework program, as well as outreach and program promotion. In our estimation, we provide <u>full</u> funding to support our telecommuting program.

See comment 4d.

Establish a pilot program.

We question the validity of assessing us against this "practice." The founding legislation contained specific timelines for implementing telecommuting programs and did not include a requirement for establishing pilot programs. Although a pilot program may provide valuable information to be used in determining whether and how to implement a telecommuting program in the first place, OPM did not need such information to make a decision to implement a program. This point is strengthened by the fact that OPM had already implemented a Telework program within the agency and had learned valuable lessons from its use years before the enactment of the legislation. Thus, while our use of Telework was not labeled a "pilot," in effect, we learned from our years of experience. That experience was used to establish and redefine our Telework policies and procedures when the law was enacted.

The fact of the matter is that OPM carefully planned and coordinated a comprehensive rollout of its internal telecommuting program and executed the implementation of our program promptly after the legislation was issued. As a result of the success of these efforts, we boast significant numbers of telecommuters within our agency and are confident that a pilot program would not have added significant value to our program.

<u>TELEWORK POLICY</u>

See comment 4e.

Establish eligibility criteria to ensure that teleworkers are selected on an equitable basis using criteria such as suitability of tasks and employee performance.

GAO indicated that OPM has taken some steps to implement this practice. We believe this is inaccurate, as we have fully implemented this practice. Our internal policy chapter (OPM Human Resources Handbook Chapter 368, Subchapter 2-3 (b)), provides objective eligibility criteria to help ensure that teleworkers are selected on an equitable basis. Our policy states that employees must be performing at least at the Fully Successful level to participate in the Telework program. In addition, we adhere to the Governmentwide guidance that it is inappropriate to look at positions in determining whether they are suitable for Telework; rather, positions must be broken down into tasks so that a determination can be made as to which aspects of the position are suitable for Telework. This method allows for an increase in participation. Managers were informed of this during the training sessions, and we refer managers to the OPM/ GSA website where this is noted. Therefore, it would have been inappropriate and limiting to include specific positions by title in our Telework policy. Rather, we state that positions must be looked at on a case-by-case basis to determine what aspects of the job may be suitable for Telework. Where disputes have arisen, we have been able to refer to our policy guidelines to substantiate the

2

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

objectivity and consistency of teleworker approval decisions. Therefore, we believe this assessment should be changed to reflect that OPM has fully implemented this practice.

See comment 4f.

Establish policies or requirements to facilitate communication among teleworkers, managers, and co-workers.

GAO indicated that OPM has taken some steps to implement this practice. This is inaccurate. OPM's telecommuting policy contains specific forms that serve as the basis for communication and document that roles and responsibilities are communicated and understood. Our policy and associated forms go as far as to require specific documentation of the types of work assignments to be accomplished and means of communication to be used with the employee when telecommuting (phone numbers, fax numbers, e-mail, etc.). In addition, our policy specifically calls for supervisors to consider the impact of telecommuting on those who report to the office and to incorporate those considerations into the decision-making process (e.g., not allowing everyone to telecommute on Fridays; or balancing telecommuting days with other types of leave requests). In addition to the requirements in our Telework policy, managers are required to communicate with their employees during performance meetings, mid-year evaluations, and performance appraisals sessions. The importance of communication was also addressed during our training sessions for managers and employees. Therefore, this should be changed to reflect that OPM has fully implemented this practice.

See comment 4g.

Develop guidelines on workplace health and safety issues to ensure that teleworkers have safe and adequate places to work off-site.

GAO indicated that OPM has taken some steps to implement this practice. This is inaccurate. Our Telework policy provides full and specific guidelines on workplace health and safety issues [Subchapter 2-3(g) of Chapter 368 states, "Employees approved to telework must have a work space that is free from personal distractions and safety hazards (See Appendix B)."] Furthermore, Appendix B provides a Safety Checklist, which is used to assist in the assessment of the overall safety and adequacy of alternate worksites. The importance of workplace health and safety was also addressed during our training sessions for managers. Therefore, the assessment should be changed to reflect that OPM fully implemented this practice.

PERFORMANCE MANAGEMENT

See comment 4h.

Ensure that the same performance standards, derived from a modern, effective, credible, and validated performance system, are used to evaluate both teleworkers and non-teleworkers.

GAO indicated that OPM has not taken any steps to implement this practice. This is inaccurate. Each employee has performance standards by which they are evaluated annually. The performance standards are based on the duties and

3

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

responsibilities of the employee's position and are not based on whether the employee is a teleworker or non-teleworker—the performance standards are the same regardless of where the work is performed. GAO's assessment would imply that we use different performance standards to evaluate teleworkers and non-teleworkers, and this is simply not the case. Furthermore, this would be contrary to OPM Telework and Performance Management guidance which states that employees should be appraised based on the results of their work whether they work in a traditional office setting or at an alternate worksite. In addition, in our supervisory training, we covered the issue of performance management and the need to be attentive to avoiding any adverse impact that might be associated with not working in the traditional worksite. We have also provided managers with the OPM handbook on measuring employee performance, which specifically states that managers should focus on outcomes and results in appraising their employees whether they work traditionally in an office or at a remote location. Therefore, this should be changed to reflect that OPM has fully implemented this practice.

TRAINING AND PUBLICIZING

Train all involved, including, at a minimum, managers and teleworkers.

See comment 4i.

GAO indicated that OPM has not taken any steps to implement this practice. This is inaccurate. OPM has provided extensive training to both managers and employees—including a mandatory training session for all OPM managers and supervisors. We also held other training seminars and briefings for employees and provided full briefings to the key representatives in our major program offices. In addition, our Telework Coordinator provides ongoing individual assistance and consultation to employees and managers. We also have plans for continued outreach and training now that our agency restructuring has been put into place. The positive outcome of these efforts is supported by the fact that our employees' response to the 2002 Federal Human Capital Survey indicate their satisfaction with telecommuting was significantly higher—by more than 14%--than the Governmentwide average. In addition, OPM sponsored a satellite broadcast for managers and employees hosted in the OPM Auditorium, which a number of OPM employees and managers attended. OPM also sponsored other Telework conferences/sessions in the OPM Auditorium attended by OPM managers and employees. Therefore, this assessment should be changed to reflect that OPM has fully implemented this practice.

TECHNOLOGY

Establish standards for equipment in the telework environment.

See comment 4j.

GAO indicated that OPM has not taken any steps to implement this practice. This is inaccurate. OPM has a standard platform for connectivity and has established a protocol for requesting necessary equipment and connectivity. Given the agency's continuous process of upgrading computer equipment, we have been able to identify an adequate supply of recently-surplused equipment that is in an appropriate condition to be re-issued to meet teleworker needs. Furthermore,

4

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

some offices have opted to purchase laptop computers and docking stations for their employees. Accordingly, this assessment should reflect that OPM has taken steps to fully implement this practice.

PROGRAM EVALUATION

See comment 4k.

Establish processes, procedures, and/or tracking system to collect data to evaluate the telework program.

GAO indicated that OPM has taken some steps to implement this practice. This is inaccurate. We collect and track a variety of data that is used to evaluate and report on our telework program. For example, the biennial customer service survey conducted by the Human Capital Management Services (HCMS) Group provides data that allows us to assess satisfaction with our telework program. In addition, we track participation rates and require each office to submit annually specific information about their teleworkers for tracking by our Telework Coordinator. We also collect data about barriers to telecommuting. We use all these data to evaluate our program and inform enhancements.

The statement on this subject made on page 39 of the draft report is inaccurate. Section 3-1(a) of our policy states, "Completed work agreements must be forwarded to the organizational telecommuting contact for recordkeeping purposes." Telework agreements are required to be in place for all teleworkers and copies of those agreements are maintained in a central file; reminders are sent quarterly to administrative contacts to provide copies of these agreements. Therefore, this should be changed to state that OPM has fully implemented this practice.

See comment 4l.

Identify problems and/or issues with the telework program and make appropriate adjustments.

GAO indicated that OPM has not taken any steps to implement this practice. This is inaccurate; the various surveys and data we collect are used not only to report on the number of employees teleworking in the agency, but also to help inform enhancements to our program. For example, data from our HCMS biennial survey solicits information about satisfaction with our program—both from employee and management perspectives. In addition, the Federal Human Capital Survey provides an indication of the success of our program. We also systematically solicit our supervisors' views to identify barriers to teleworking. Further, our Telework Coordinator receives daily comments and suggestions from managers and employees. All of these data sources are used to help shape enhancements to our telework program. Therefore, this should be changed to reflect that OPM has fully implemented this practice.

5

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

Appendix B

Comments on GAO Draft Report re GSA's Internal Telework Program

See comment 5.

The following comments pertain to the GAO assessment of GSA telework practices in its' internal program. We believe that certain findings should be revised as follows:

Program Planning Practices

See comment 5a.

- Develop an implementation plan for the telework program. "Since the GSA program has been in place for more than 10 years, we do not have or need a current "implementation plan". Instead, we have a successfully operating ongoing plan. The original implementation plan was utilized ten years ago and was not kept in the files because it is no longer in use."

See comment 5b.

- Provide funding to meet the needs of the telework program. "We do not have a central telework fund at GSA, however, individual organizations provide their own funding, such as is evident in the Office of Governmentwide Policy. Also, we have set aside the required central funding for telecenter utilization."

See comment 5c.

- Establish a pilot program. "As mentioned above, many years ago, we completed an initial pilot program. Telework, at GSA, is now an operational program and, consequently, there is no further need for piloting."

See comment 5d.

Telework Policy Practices

- Establish eligibility criteria. "GSA has specifically kept the eligibility criteria very broad, which we recognize lowers our percentage rate of participants, in order to ensure that the widest possible population within the agency is allowed to consider telework."

- Establish policies or requirements to facilitate communication among teleworkers, managers, and co-workers. "Although we do not have formal policies and requirements, we have a strong network of telework coordinators throughout our regions and central office organizations. We also continuously provide information to our workforce on-line and through e-mail distribution of the GSA Update publication. We place a strong emphasis on communication among teleworkers, managers, and co-workers."

Performance Management Practices

- "GSA consistently emphasizes the importance of fairness toward teleworkers and others."

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

GAO Responses to Comments from GSA and OPM

1. In their combined comments, GSA and OPM agreed that telework is an important tool for federal agencies and stated that they would encourage and champion telework as a key human capital flexibility and do everything possible to facilitate its acceptance and use. The agencies also agreed to implement our recommendation that they use their lead roles in the federal telework initiative to assist agencies in implementing the key telework practices we identified. In this regard, GSA and OPM stated that they will provide agencies with a checklist of the practices we identified and recommend that agencies do a self-assessment of their telework programs using our analytical framework. Both GSA and OPM will then offer to help agencies to improve in the identified areas of deficiency. OPM will also include the key telework practices that we identified in telework training, which, as we had noted in the draft report, is being developed for launch on its Web-based training site during fiscal year 2003.

2. In addition, GSA agreed with our recommendation that it work with Congress to determine what was meant by the phrase "GSA telecommunication center" in Section 314, Division F, title III of Pub. L. No. 108-7 and whether this provision is in conflict with the provision contained in 40 U.S.C. 587(d)(2). GSA stated that it will coordinate internally and with the appropriate congressional committees to resolve the conflicting language in the statutes and then provide clarification to its customer agencies.

3. GSA and OPM disagreed with several of our findings relating to their lead roles in the governmentwide telework initiative. Below are summaries of GSA's and OPM's comments and our responses:

   a. These agencies stated that, given the efforts they have made in promoting telework, they were "taken aback" by language in the draft that noted confusion at the "implementation level" throughout the federal government regarding the policy guidance that they had put forth to date. However, as detailed in our draft report, our finding was actually that conflicting messages from GSA and OPM on certain telework-related matters had created confusion. Apart from this finding, we recognize GSA's and OPM's efforts to promote telework and had included in our draft report many of the examples of those efforts that GSA and OPM cited in their response, such as jointly running the telework Web site to provide information and guidance, OPM's rapid issuance of guidance in response to our finding related

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

to the lack of a definition for providing employees with the opportunity to telework, and GSA's management and promotion of the telework centers. Also, our draft report discussed OPM's outreach effort to meet face to face with agencies' telework coordinators and, as GSA's and OPM's comments noted, this effort was also described in our May 2003 report entitled *Human Capital: OPM Can Better Assist Agencies in Using Personnel Flexibilities*.[48] However, while such promotional efforts can be constructive, they do not address the confusion we identified as a result of GSA's and OPM's conflicting messages.

b. GSA and OPM strongly disagreed with our finding that they have not fully coordinated their governmentwide telework efforts in the past. In one instance, they said that the draft report stated there were unresolved disagreements between GSA and OPM on telework policy issues concerning dependent care and emergency closing of government offices, and that they believed there were no such disagreements. However, GSA and OPM also stated that, while they believed that their responses to the dependent care and emergency closing issues were not in conflict, they clarified them to avoid any confusion. We believe this is a noteworthy development because, as stated in our draft report, agencies had expressed concern about conflicting messages they had received from GSA and OPM on several topics, including dependent care and emergency closings.

More generally, we also indicated in our draft report that, because GSA and OPM have not developed a Memorandum of Understanding or other formal agreement regarding their responsibilities for the governmentwide telework initiative, they should work together to reach a formal agreement establishing a delineation of these responsibilities. In their comments, the agencies said that they have recognized the need to better outline separate and shared responsibilities and that a Memorandum of Understanding was among the options they were considering to clearly designate each agency's responsibilities. We have added language to reflect GSA's and OPM's commitment to address these areas.

---

[48]U.S. General Accounting Office, *Human Capital: OPM Can Better Assist Agencies in Using Personnel Flexibilities*, GAO-03-428 (Washington, D.C.: May 9, 2003).

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

c. In addition, GSA's and OPM's comments said that it was unnecessary for OPM to re-coordinate with GSA on the final version of the telework guide for managers, supervisors, and telework coordinators because GSA's comments had already been incorporated into the guide. Although we found that OPM had made substantive changes to the guide subsequent to GSA's review, we now believe that, given the concerns expressed by agencies, and underscored by Education's and VA's comments on our draft report, it was sufficiently important to issue the guide in a timely fashion, without a final review by GSA. Relevant changes have been made to our report.

d. According to GSA's and OPM's comments, GSA's senior program executive for telework disputed our finding that GSA had expressed concerns about OPM's changes to the joint OPM/GSA telework Web site (www.telework.gov). However, this statement varies from information provided to us both by GSA and OPM officials during the course of our review and by the senior OPM official for the governmentwide telework initiative at our exit conference with OPM. For example, during our exit conference, the senior OPM official for the governmentwide telework initiative acknowledged changing the telework Web site without GSA being informed or OPM getting input from GSA. She said that GSA was not very happy with the new look, adding that GSA felt the changes were imposed on it by OPM without any consultation. Nonetheless, we have adjusted the report to reflect the view of the GSA senior program executive.

e. In their comments, GSA and OPM also said that the two agencies had jointly determined it would be inappropriate to post the "pre-decisional" Interagency Telework Issues Working Group report on the federal telework information Web site (www.telework.gov) until they had had the opportunity to analyze its findings, address issues contained therein, and fully consider all recommendations. However, GSA has already independently posted this report on its own Web site with a disclaimer, stating: "OPM and GSA co-led the Interagency Telework Issues Working Group by offering technical guidance, support, and resources. The findings and recommendations made in this final report reflect the opinions of the Working Group members. This final report does not in any way, specific or implied, represent the official views, positions, or policies of the U.S. Government, OPM, GSA, nor any of the agencies participating on the Working Group. This report is currently under review by both OPM and GSA." Given that GSA and OPM co-led this

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

group with participation from 15 federal agencies to identify policy actions needed to facilitate agency use and expansion of telework and then make recommendations, we believe that the report should be posted on www.telework.gov, with the same or a similar disclaimer, in the interests of transparency.

4. OPM also raised issues with our analysis of its internal telework program. OPM stated that our draft report indicated that 12 of our 25 identified key practices still needed to be implemented at OPM. While our draft report showed that OPM had "fully implemented" 13 of the practices, it went on to say that OPM had "taken some steps to implement" 5 of the remaining practices and had "not taken any steps to implement" the other 7 practices. OPM's comments related to its internal telework program maintained that it has fully implemented 24 of the 25 practices, stating that the 25th practice should not apply to it. As we clarified in this report, some of the practices, such as developing an implementation plan and establishing a pilot program, are historical in nature and cannot be implemented at this time by agencies with existing telework programs. However, as we also clarified in the report, agencies with existing programs that did not initially implement some of the more developmental practices can still be successful with sustained attention to the other practices we identified.

In its comments, OPM stated that "[E]ach comment listed was conveyed to GAO during the interview process." On the contrary, OPM's comments, for the most part, contain new information and/or information that does not correspond with what was conveyed to us during our meetings with OPM officials. Summaries of OPM's comments, and our responses, are discussed below:

a. OPM disputed our finding that the agency had not established measurable telework program goals, saying that it had done so by meeting, even exceeding, the requirements of Section 359 of Pub. L. No. 106-346. OPM said that, "[i]n effect, the legislation has provided the program goals for Federal agencies through 2004." However, in its May 2003 telework guide for managers, supervisors, and telework coordinators,[49] OPM discusses the importance of establishing program goals and objectives for telework because they will be

---

[49]U.S. Office of Personnel Management, *Telework: A Management Priority—A Guide for Managers, Supervisors, and Telework Coordinators* (Washington, D.C.: May 2003).

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

helpful in conducting program evaluations of a telework program. OPM's guide notes that "[k]ey issues for evaluation for most agencies include the effect of telework on productivity, operating costs, employee morale, recruitment, and retention" and that the evaluation plan "should be based on quantifiable program goals and objectives to allow for ease of measurement." Section 359 of Pub. L. No. 106-346 refers broadly to the federal workforce and OPM has not provided any documentation illustrating how it has converted the law's requirements into program goals to measure the effect of telework on productivity, operating costs, employee morale, recruitment, retention, or any other such desirable outcome. Moreover, OPM's telework coordinator told us during the course of our review that goals have not been set for OPM's internal program. Given these considerations, our assessment of OPM for this practice remains unchanged.

b.   OPM disagreed with our finding that it had not established a business case for implementing a telework program, stating that the business case for telework has been developed through various means, including statements made in its governmentwide guidance, information provided in training sessions for its managers, and by referring its managers to the OPM/GSA telework Web site. As described in a source from which we drew our key practices, a comprehensive business case for a telework program entails identifying full costs and benefits to the extent practicable, prior to implementation of the program, that are specific to the organization, including IT components, facilities, recruiting, retention, contingency support, and security and risk assessments.[50] The business case that OPM refers to in its comments does not fully meet these criteria. Furthermore, this comment does not correspond with what was conveyed to us during our meetings with OPM officials. Instead, OPM's telework coordinator at the time its current program was developed in 2001 told us that a business case for telework had not been developed prior to implementing the telework program. Given these considerations, our assessment of OPM for this practice remains unchanged.

c.   OPM disputed our finding that it has only taken some steps to provide funding to meet the needs of the telework program. The

---

[50]Booz Allen Hamilton, V-2.

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

agency said that it has provided "<u>full</u> funding" for its telework program and that it has identified resources that have allowed it to accommodate "<u>every</u> employee (who is otherwise eligible and wants to telecommute) with appropriate computer equipment, technology support, and remote connections." OPM did not provide documentation of this funding. As our draft report indicated, OPM has taken important steps to implement this practice, by paying the salary for a telework coordinator and setting aside $50,000 in fiscal year 2002 for telework center use, as required by law. However, an IT official at OPM said that there were times that the agency has experienced shortages of the older computers it loans to teleworkers. He said that the people who absolutely need to telework get computers immediately, if they require one, but that people who would like to telework, but do not have a "need" to do so, have had to wait to begin teleworking until computers become available. According to this IT official, managers usually make the decision about whether telework is a "need," although employees will sometimes decide for themselves that it is not necessary for them to telework. Given these considerations, we did not change our assessment that OPM had taken some steps to implement this practice.

d. OPM questioned the validity of our having assessed its telework program against the practice of establishing a pilot program because "the founding legislation" did not include a requirement for establishing pilot programs and because OPM is confident that a pilot would not have added significant value to its program. As noted in our draft, we used a variety of sources, including GSA's and OPM's telework guidance, to identify key practices. Successful telework experiences and related telework literature suggest that pilot programs can be valuable at the outset of telework initiatives by providing a means to test the concept and its integration within a particular organization's environment. However, as we recognize in this report, agencies with existing telework programs that did not implement this practice when the program was initially developed can still have successful telework programs with sustained attention to the other practices. Because OPM did not establish a pilot program at the outset of its telework program, our assessment of OPM for this practice remains unchanged.

e. OPM disagreed with our finding that it had taken some steps to establish eligibility criteria to ensure that teleworkers are selected on

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

an equitable basis using criteria such as suitability of tasks and employee performance, stating that it had fully implemented this practice by providing objective eligibility criteria in its telework policy. Our draft report noted the progress OPM had made in this area and that guidance was in place on eligibility criteria. However, OPM's telework coordinator also told us that the eligibility criteria varied by OPM unit and may not be consistently applied. Therefore, while the OPM guidance is an important step, its consistent application is not being ensured. Thus, we continue to believe that OPM has taken some steps to implement this practice.

f. OPM disagreed with our finding that it had taken some steps to establish policies or requirements to facilitate communication among teleworkers, managers, and coworkers, stating that its policy and associated forms serve to facilitate communication. Based on further analysis of the policy and its associated forms, we have changed the report to reflect that OPM has fully implemented this practice.

g. OPM disagreed with our finding that it has taken some steps to develop guidelines on workplace health and safety issues to ensure that teleworkers have safe and adequate places to work off-site, because one of the appendixes included with OPM's telework policy is a safety checklist for the alternate worksite. As we noted in our draft report, OPM's telework policy states that the telework agreement should include a safety checklist. Importantly, however, the suggested checklist, included as an appendix to OPM's policy, states that the employee "may use" it to "assist them in a survey of the overall safety and adequacy of their alternate worksite." It goes on to say "the following are only recommendations and do not encompass every situation that may be encountered." Moreover, the checklist does not have a signature line or any way for it to be certified by the employee. Because this checklist is only recommended, not required, and does not need to be certified by the employee, it is not sufficient to ensure that teleworkers have a safe and adequate place to work off-site. Therefore, we continue to believe that OPM has taken some steps to implement this practice.

h. OPM disagreed with our finding that it has not taken any steps to ensure that the same performance standards, derived from a modern, effective, credible, and validated performance system, are used to evaluate both teleworkers and nonteleworkers, saying that the

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

performance standards that employees are evaluated against annually are based on the duties and responsibilities of the employee's position and not on whether the employee is a teleworker or nonteleworker. OPM further stated that the performance standards are the same, regardless of where the work is performed. As we stated in the draft report, although OPM's policy does state that the employees' current performance standards will be used to govern all telecommuting assignments, as well as those in the telecommuters' current traditional federal offices. However, it does not include a statement requiring that the same performance standards be used for teleworkers and nonteleworkers. Without such a statement, at a minimum, OPM cannot fully ensure that the same performance standards are used to evaluate both teleworkers and nonteleworkers. Nonetheless, we have revised the report to acknowledge that OPM has taken some steps to implement this practice. While these steps are important, there are steps that OPM can take to more fully ensure that the criteria have been consistently applied, such as periodically checking the performance appraisals for consistency.

i. OPM disagreed with our finding that it had not taken any steps to train all involved in its telework program, including, at a minimum, managers and teleworkers, saying that it has provided extensive training to both managers and employees. However, this comment does not correspond with what was conveyed to us during our meetings with OPM officials. According to both the current and past OPM telework coordinators, OPM had provided mandatory training to managers and optional training to employees when the telework program began, more than 2 years ago. In addition, they told us that OPM has not provided any training since then. Even the initial training would not have been sufficient to train "all involved" in the telework program, because employees were not required to attend. In response to OPM's comments, we have revised our report to reflect OPM's initial training efforts by indicating that OPM has taken some steps to implement this practice. We are also pleased that OPM indicated in its comments that, now that its agency restructuring has been completed, it plans to provide continued outreach and training on telework. However, OPM cannot be considered to have fully implemented the practice of training all involved in its telework program until this training is actively provided to and required of all relevant parties.

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

j. OPM disputed our finding that it had not taken any steps to establish standards for equipment in the telework environment, saying that OPM has a standard platform for connectivity and has established a protocol for requesting necessary equipment and connectivity. During our review, an IT official from OPM told us that the equipment standards had not yet been fully applied to agency-owned equipment, but he expected this to be done between July and October 2003. Based on OPM's more recent comments, we have revised our report to reflect that OPM has taken some steps to implement this practice. However, the IT official also told us that OPM does not have a standard for employee-provided equipment. Until OPM establishes and applies its standards to employee-provided equipment, it will not have fully implemented this practice.

k. OPM disputed our finding that it had taken some steps to establish processes, procedures, and/or a tracking system to collect data to evaluate the telework program, stating that it collects and tracks a variety of data that is used to evaluate and report on its telework program. According to OPM, because its policy states "[c]ompleted work agreements must be forwarded to the organizational telecommuting contact for record keeping purposes," the agency has fully implemented this practice. In our draft report, we recognize OPM's policy that employees sign a work agreement with their supervisor. However, OPM's telework coordinator told us that work agreements, whether in hard copy or e-mail form, are not always completed and forwarded to her. Additionally, while OPM endeavors to track participation rates through these work agreements, the agreements only provide information on how many employees have been approved to telework, not how many are actually participating. Without a tracking and evaluation system that accurately measures program participation, OPM cannot be considered to have taken more than some steps to implement this practice. One such system was suggested by OPM itself in the section of GSA's and OPM's comments on our draft report that is related to those agencies' governmentwide leadership roles. These comments said, "OPM has concluded from research that the best telework data is collected through time and attendance tracking systems. OPM will be issuing guidance to agencies later this year on the use of this data source for its next survey." Such guidance will be an important step toward helping all agencies to more accurately track and report such data and so that they can use the data for evaluation and program improvement purposes.

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

l. OPM disputed our finding that it had not taken any steps to identify problems and/or issues with the telework program and make appropriate adjustments, indicating that the various surveys and data it collects are used, not only to report on the number of employees teleworking in the agency, but also to help inform enhancements to its program. However, OPM's telework coordinator indicated that she does not actively seek to identify issues using any evaluation tools. Instead, as OPM pointed out in its comments, she relies on employees to bring issues to her attention. While employees can be an important source of information, such data sources are complements to, and not substitutes for, formal feedback mechanisms and well-designed evaluations, as described in OPM's recently released telework guide to managers, supervisors, and telework coordinators.[51] Nonetheless, given these considerations, we have revised our assessment of OPM for this practice to reflect that it has taken some steps to implement this practice.

5. GSA did not disagree with our findings pertaining to its internal telework program. However, the agency did note several areas where it would like us to revise statements relative to its implementation of the key practices we identified. Below is a summary of GSA's comments and our responses:

a. GSA said that, since its program has been in place for more than 10 years, it does not have or need a current implementation plan. Furthermore, GSA indicated that it had an implementation plan that was utilized 10 years ago, when the program was first developed. However, GSA stated that this plan was not kept in the files, because it is no longer in use. We agree that GSA should not develop an implementation plan for a program that is already in place. Our analysis was focused on whether an agency had developed an implementation plan to shape the design and implementation of its program to ensure future success. In this regard, GSA's telework coordinator had told us that there was not a written implementation plan for the telework program when it was first started. Nevertheless, we have revised our report to indicate that we were unable to assess GSA on this practice.

---

[51]U.S. Office of Personnel Management, *Telework: A Management Priority—A Guide for Managers, Supervisors, and Telework Coordinators* (Washington, D.C.: May 2003).

Appendix V
Comments from the General Services
Administration and the Office of Personnel
Management

b. GSA indicated that it does not have a central telework fund and that individual organizations within GSA provide their own funding. We had considered this information in our analysis of the level of GSA's implementation of this practice. However, we have added GSA's statement to our report to provide additional context. Also, as already noted in our draft report, GSA said that it had set aside the required central funding for telecenter utilization.

c. GSA noted that it has an operational telework program and, consequently, there is no further need for piloting. We agree with GSA that there is no further need for piloting. Our analysis in this regard assessed whether or not an agency had established a pilot at the beginning of its individual telework program. GSA did not establish a pilot program prior to implementation of its telework program. Therefore, our assessment of GSA for this practice remains unchanged.

d. In addition, GSA provided comments related to several other areas, including: 1) its position on establishing telework eligibility criteria, 2) its emphasis on fairness toward teleworkers and others, and 3) its existing lines of communication regarding telework, including its network of telework coordinators in regions and organizations throughout the agency, its provision of e-mail and on-line information on telework, and its "strong emphasis on communication." While these comments were helpful in setting the context for GSA's internal telework program, they were not relevant to our analysis and, therefore, are not reflected in the body of our report.