

U.S. Department of Labor

Office of Inspector General—Office of Audit

**EMPLOYMENT STANDARDS
ADMINISTRATION**



GPRA DATA VALIDATION REVIEW FEDERAL EMPLOYEES' COMPENSATION ACT

**Date Issued: September 27, 2005
Report Number: 22-05-008-04-431**

BRIEFLY...

**Highlights of Report Number: 22-05-008-04-431, to the Assistant Secretary for Employment Standards.
September 2005**

WHY READ THE REPORT

The Federal Employees' Compensation Act (FECA), administered by the Employment Standards Administration (ESA), was enacted in 1916 to provide workers' compensation coverage to Federal and Postal workers around the world for employment-related injuries and occupational diseases. Benefits include wage replacement, payment for medical care, and where necessary, medical and vocational rehabilitation assistance in returning to work. The program has twelve district offices nationwide.

The Labor Department relies on data, submitted by the district offices, to assess whether or not the program is achieving its yearly goals, and if changes are needed to make it more effective. Congress may review performance information in making decisions about future program funding.

WHY OIG DID THE REVIEW

We conducted our review to determine the completeness and reliability of the CY 2003 data used to support the FY 2003 performance goal 2.2C: "Minimize the human, social, and financial impact of work-related injuries for workers and their families." We selected FECA data from CY 2003 for our review. Six district offices were randomly selected for our review.

READ THE FULL REPORT

To view the report, including the scope, methodology, and full agency response, go to:
<http://www.oig.dol.gov/publicreports/oa/2005/22-05-008-04-431.pdf>.

September 2005

GPRA Data Validation Review, FECA Program

WHAT OIG FOUND

Based on our review, we concluded that reductions in payments of Periodic Roll Management (PRM) benefits, due to the death of a claimant, are included in the FECA Program's computation of savings generated in the first year. Accurate recording of the reduction in PRM benefit payments is critical because the FECA GPRA goal addresses first year savings generated through use of PRM in the FECA program. The PRM module of the Sequent System calculates savings by comparing benefit payment amounts before and after FECA resolves a case through a change or termination of benefits due to disability, reemployment or death. The six district offices we visited resolved 2,683 cases in CY 2003. Of these, 739 cases (27 percent) were resolved due to claimant deaths, which resulted in benefit payment reductions of \$1,334,190.

WHAT OIG RECOMMENDED

To improve the completeness and reliability of the Federal Employees' Compensation Act performance data, we recommend that the Assistant Secretary for Employment Standards ensure the FECA Program excludes cases resolved due to claimants' death from the calculation of savings generated through use of Periodic Roll Management.

ESA concurred with the recommendation and provided information about actions taken and planned to address the recommendation.

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Executive Summary

The Office of Inspector General conducted a review of calendar year (CY) 2003 data collected and reported from the Sequent mainframe system of the Employment Standards Administration's (ESA), Office of Workers' Compensation Programs (OWCP), Division of Federal Employees' Compensation (DFEC). The Federal Employees' Compensation Act (FECA) was enacted in 1916 to provide workers' compensation coverage to Federal and Postal workers around the world for employment-related injuries and occupational diseases. Benefits include wage replacement, payment for medical care, and where necessary, medical and vocational rehabilitation assistance in returning to work. DFEC adjudicates new claims for benefits and manages ongoing cases; pays medical expenses and compensation benefits to injured workers and survivors; and helps injured employees return to work when they are medically able to do so. DFEC has 12 district offices nationwide.

We conducted our review to determine the completeness and reliability of the CY 2003 performance data submitted via the Sequent System, for indicators one through six reported by the FECA program for Department of Labor Performance Goal number 2.2C. ESA compiles the data and computes and reports the final results in the Department of Labor Annual Performance and Accountability Report. OIG relied on CY 2003 data to compile the schedule of FECA performance data and results for CY 2003, specifically for DOL's Government Performance and Results Act (GPRA) goal related to minimizing the human, social, and financial impact of work-related injuries for workers and their families. The accuracy of the reported results for the performance goal relies on the validity of the data maintained in the Sequent System.

Results

We were able to verify to source documents the data used to report the program results for FECA performance indicators one through three, five and six, reported for Performance Goal number 2.2C "Minimize the human, social and financial impact of work-related injuries for workers and their families." We concluded that FECA overstated indicator four by including benefit payment savings resulting from claimant deaths, since the reduction of benefit payments did not result from FECA intervention. Indicator four measures FECA's plan to achieve \$20 million cumulative first year savings in FY 2003 through use of the Periodic Roll Management (PRM). The PRM module of the Sequent System calculates savings by comparing the difference between benefit payment amounts before and after FECA resolves a case that resulted in a change or termination of claimant benefits due to disability, reemployment or death. FECA reported in the FY 2003 Department of Labor Performance and Accountability Report cumulative first year savings of \$24.6 million and that it had met this performance indicator. The six district offices we visited resolved 2,683 cases in CY 2003. Of these cases, 739 (27 percent) cases were resolved due to claimant deaths, which resulted in benefit payment reductions of \$1,334,190.

Based on our review of the six FECA indicators, with the exception of the matter described in the preceding paragraph, nothing came to our attention that caused us to believe the schedule of FECA performance data and results for CY 2003 is not presented, in all material respects, in conformity with GPRA and Office of Management and Budget Circular No. A-11 (July 16, 2004), Section 230.2. The section states that agencies are required to assess the completeness and reliability of performance data reported.

Recommendations

To improve the completeness and reliability of the Federal Employees' Compensation Act performance data, we recommend that the Assistant Secretary for Employment Standards ensure the FECA Program excludes cases resolved due to claimants' death from the calculation of savings generated through use of Periodic Roll Management.

Agency Response

In response to our draft report, the Assistant Secretary for Employment Standards stated that the Division of Federal Employees' Compensation (DFEC) has undertaken action to modify the methodology it applies to the calculation for Periodic Roll Management (PRM) savings beginning in FY 2006.

The ESA's response in its entirety is attached as Appendix D.

OIG Conclusion

We agree with ESA's planned corrective actions. The recommendations are resolved and open. They will be closed upon OIG's review of DFEC's calculation for PRM savings in FY 2006.

U.S. Department of Labor

Office of Inspector General
Washington, DC 20210



Assistant Inspector General's Report

Victoria A. Lipnic
Assistant Secretary for
Employment Standards Administration

The Division of Federal Employees' Compensation (DFEC) adjudicates new claims for benefits and manages ongoing cases; pays medical expenses and compensation benefits to injured workers and survivors; and helps injured employees return to work when they are medically able to do so. The Employment Standards Administration (ESA), Office of Workers' Compensation Programs (OWCP) administers the Federal Employees' Compensation Act (FECA) program through the 12 DFEC district offices.

ESA provides information for Performance Goal 2.2 reported in the annual Department of Labor (DOL) Performance and Accountability Report (PAR) and is as follows "Minimize the human, social, and financial impact of work-related injuries for workers and their families."

Performance Goal number 2.2C consists of 10 performance indicators related to ESA of which indicators one through six report the results of the FECA program. The remaining four indicators report the results of the Longshore and Harbor Workers, Black Lung and Energy Programs. These six indicators related to FECA are:

- Indicator 1 - For FECA cases of the United States Postal Service, reduce the lost production days rate (LPD per 100 Employees) by 1 percent from the FY 2002 baseline.
- Indicator 2 - For FECA cases of all other Government Agencies, reduce the lost production days rate (LPD per 100 Employees) by 3 percent from the FY 2001 baseline.
- Indicator 3 - FECA will increase Vocational Rehabilitation placements with new employers for injured USPS employees by 5 percent over FY 2002.
- Indicator 4 - Through use of Periodic Roll Management, produce \$20 million in cumulative, first year savings in the FECA program¹.

¹ In FY 2004, FECA increased this indicator from \$20 million to \$38 million.

- Indicator 5 - The trend in the indexed cost per case of FECA cases receiving medical treatment will remain below the comparable measure for nationwide health care costs.
- FY 2004 Indicator 6 - Improve FECA customer service performance levels.

Program performance data to support this goal is collected at the 12 DFEC district offices located nationwide. ESA compiles the data and computes and reports the final results in the Department of Labor Annual Performance and Accountability Report. OIG relied on CY 2003 data to compile the schedule of FECA performance data and results for CY 2003, specifically for DOL's Government Performance and Results Act (GPRA) goal related to minimizing the human, social, and financial impact of work-related injuries for workers and their families. We obtained FECA performance summary data from ESA for CY 2003. The auditors compiled the data received, and using ESA's formulas, calculated results for selected Indicators based on CY 2003 data. We reviewed 464 case files maintained at 6 district offices to verify that the reported performance goals were supported. The accuracy of the reported results for the performance goal relies on the validity of the data maintained in the Sequent System.

We reviewed indicators one through six that report the results of the FECA program. We reviewed case file information used to support the data maintained in the various modules of the Sequent System. Additionally, DFEC personnel provided us information on how they and the system authorize, collect, and process the data reported for these indicators. We also reviewed internal control procedures in place to ensure completeness and reliability of the reported data.

We reviewed case file information supporting these performance indicators at the six district offices visited to determine the completeness and reliability of DOL CY 2003 performance data for FECA. Without complete and reliable participant data, ESA cannot effectively measure its progress toward achieving the GPRA goal related to minimizing the human, social, and financial impact of work-related injuries for workers and their families.

Our review was conducted in accordance with the attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestations contained in Government Auditing Standards, issued by the Comptroller General of the United States. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on the schedule of FECA performance data and results. Accordingly, we do not express such an opinion.

We were able to verify to source documents the data used to report the program results for FECA performance indicators one through three, five and six. We concluded, however, that FECA overstated indicator four by including benefit payment savings that resulted from claimant deaths in cumulative first year savings. The PRM module of the Sequent System calculates savings by comparing the difference between benefit

payment amounts before and after FECA resolves a case that resulted in change or termination of claimant benefits due to disability, reemployment or death. The 6 district offices we visited resolved 2,683 cases in CY 2003. Of those cases, 739 (27 percent) cases were resolved due to claimant deaths, which resulted in benefit payment reductions of \$1,334,190. FECA should not include benefit payment savings that result from claimant deaths since the savings do not result from its intervention.

Based on our review of the six FECA indicators, with the exception of the matter described in the preceding paragraph, nothing came to our attention that caused us to believe the schedule of FECA performance data and results for CY 2003 is not presented, in all material respects, in conformity with GPRA and Office of Management and Budget Circular No. A-11 (2004), Section 230.2, which states that agencies are required to assess the completeness and reliability of performance data reported.

FINDING AND RECOMMENDATION

Objective – Is CY 2003 GPRA performance data for FECA complete and reliable?

Finding - FECA overstated indicator four by including benefit payment savings that resulted from claimant deaths in cumulative first year savings.

We were able to verify to source documents the data used to report the program results for FECA performance indicators one through three, five and six, reported for Performance Goal number 2.2C “Minimize the human, social and financial impact of work-related injuries for workers and their families.”

FECA overstated indicator four by including savings resulting from claimant deaths in cumulative first year savings.

FECA overstated indicator four for Performance Goal 2.2C by including benefit payment savings that resulted from claimant deaths in cumulative first year savings. The 6 district offices we visited resolved 2,683 cases in CY 2003. Of those cases, 739 (27 percent) cases were resolved due to claimant deaths, which resulted in benefit payment reductions of \$1,334,190. For this indicator, FECA reported in the DOL FY 2003 PAR that the use of the PRM module in the Sequent System allowed it to achieve \$24.6 million in cumulative first year savings. The cumulative first year savings exceeded the planned measure of \$20 million. The PRM module of the Sequent System calculates savings by comparing the difference between benefit payment amounts before and after FECA resolves a case that resulted in a change or termination of claimant benefits due to disability, reemployment or death.

The main criteria that govern the work performed are as follows:

- OMB Circular No. A-11 (2004), Section 230.2 which states that agencies are required to assess the completeness and reliability of performance data reported
- OMB A-123, which requires agency managers to incorporate control strategies, plans, guidance and procedures that govern their program's operations
- ESA Reviewing Periodic Roll Cases Resource Book, dated 1999, which provides guidance in the maintenance of PRM cases
- Government Accountability Office (GAO) Standards for Internal Control in the Federal Government, November 1999.

One of the five standards for internal control, according to the GAO Standards for Internal Control in the Federal Government, dated November 1999, is "control activities." An example of a control activity that is common to all agencies is review and monitoring of performance measures and indicators. Specifically per the GAO standard:

Activities need to be established to monitor performance measures and indicators. These controls could call for comparisons and assessments relating different sets of data to one another so that analyses of the relationships can be made and appropriate actions taken. Controls should also be aimed at validating the propriety and integrity of both organizational and individual performance measures and indicators.

FECA should not have included changes or termination of benefits that resulted from claimant deaths as part the cumulative first year savings since we determined through our review that the savings did not result from FECA intervention. We reviewed the PRM Resolution Lists that included all cases resolved in CY 2003 for the 6 district offices we visited. We also identified all cases where the district offices resolved and terminated benefits due to the claimant's death. Of the 2,683 cases resolved in CY 2003, these district offices resolved 739 (27 percent) where benefit payment savings resulted from the claimants' death. These 739 cases had a reduction in benefit payments of \$1,134,190, (PRMS) (see Exhibit A). In its response to our Statement of Facts, FECA proposed the following revision to performance indicator four in FY 2006:

Through staff-initiated evaluation of cases under Periodic Roll Management for changes in medical condition, ability to return to work, and similar eligibility changes, produce X millions in savings.

Recommendation

To improve the completeness and reliability of the Federal Employees' Compensation Act (FECA) performance data, we recommend that the Assistant Secretary for Employment Standards ensure the FECA Program excludes cases resolved due to claimants' death from the calculation of savings generated through use of Periodic Roll Management.

Agency Response

In response to our draft report, the Assistant Secretary for Employment Standards stated that the Division of Federal Employees' Compensation (DFEC) has undertaken action to modify the methodology it applies to the calculation for Periodic Roll Management (PRM) savings beginning in FY 2006.

OIG Conclusion

We agree with ESA's planned corrective actions. The recommendations are resolved and open. They will be closed upon OIG's review of DFEC's calculation for PRM savings in FY 2006.



Elliot P. Lewis
July 1, 2005

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Exhibit

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EXHIBIT A

FEDERAL EMPLOYEES' COMPENSATION ACT PRM DATA AND
RESULTS FOR CALENDAR YEAR 2003

PRM Resolutions for the 6 District Offices Visited (by district office)

District Office (number)	Resolutions Due to Claimants Death	Amount (in \$'s)	Total Resolutions	% of Resolutions Due to Death
Jacksonville (6)	319	\$ 590,124	1045	31%
Cleveland (9)	97	\$ 156,842	218	44%
Chicago (10)	10	\$ 18,198	160	6%
Denver (12)	54	\$ 96,825	173	31%
San Francisco (13)	197	\$ 381,790	760	26%
Washington, DC (25)	62	\$ 90,412	327	19%
Total	739	\$ 1,334,190	2683	27%

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Appendices

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APPENDIX A

BACKGROUND

The Federal Employees' Compensation program was established under the Federal Employees' Compensation Act (FECA) (Title 5 U.S.C. Sections 8101-8193). Regulations governing the FECA program are found at 20 CFR, Parts 1-25. FECA's purpose is "to provide Federal employees who sustain work-related injury or disease with adequate and timely benefits for medical care and wage loss replacement, as well as the assistance in returning to work where necessary."

ESA manages the FECA program, and in turn has delegated the authority and responsibility for administering the program to the Office of Workers' Compensation Programs (OWCP) through the 12 district offices of the Division of Federal Employees' Compensation (DFEC). Information collected from various modules of the Sequent System is used to report performance data and outcomes for the FECA program.

In order to qualify for FECA benefits, a claimant must be eligible. The claims process begins when an injured worker submits a Form CA-1 (Report on Traumatic Injury) or Form CA-2 (Notice of Occupation Illness) to a DFEC district office. Data entry clerks receive CA-1 and CA-2 forms and enter them into the Case Management File System (CMF), where CMF assigns a unique nine-character number for each claimant. CMF is a module of the FECA Sequent System. Once cases are created, they are assigned to a claims examiner (CE), who has the responsibility to collect, review and process information related to the claim. District offices send completed CA-1 and CA-2 forms to London, Kentucky, so they can be entered into the OWCP Automated System for Imaging Services (OASIS), a system used to store and manage the large number of documents required to file a claim.

After thoroughly reviewing the case file, the CE denies, approves or defers the claim. If the CE denies the case, he/she notifies the claimant for the determination and closes the case. Deferred cases require the CE to conduct further research. If approved, the CE keys the case into the Automated Compensation Payment System (ACPS) which stores approved payments for overnight transmission to the DFEC National Office. The CE establishes and the Senior CE certifies the payment. The DFEC National Office receives the payment data, calculates the benefits, conducts final edit checks, and transmits data the DFEC district office. The CE reviews the accuracy of payment schedule and approves or disapproves payment. If the CE disapproves payment, he/she resubmits for processing. The DFEC district office sends the payment information to Treasury who pays the claimant by check or direct deposit.

The case management process includes a nurse intervention phase, possible development of medical evidence by the CE, and a vocational rehabilitation phase, if needed. During the nurse intervention phase, the CE typically creates a new case when the injured worker's first claim for wage loss compensation is approved with no expected return to work date. A Staff Nurse receives the case and assigns it to a Field

Nurse, who works with the treating physician and the injured worker to achieve recovery and return to work with the Federal-employing agency. In most cases, the injured worker returns to work within 90 to 120 days or the Staff Nurse has identified the employment limitations and referred the injured worker to a Rehabilitation Specialist to initiate vocational rehabilitation services. DFEC provides vocational rehabilitation services as a benefit to improve a worker's skills before it makes a compensation determination, as well as to reduce reliance on compensation. Vocational rehabilitation services include testing, evaluation, counseling, guidance, training, placement, and follow-up. Staff Nurses and Rehabilitation Specialists manage and oversee all claims and vocational rehabilitation contractors. The injured worker should fully cooperate with the Staff Nurse, the CE and Rehabilitation Contractors or DFEC might adjust the compensation benefit in accordance with laws and regulations. Vocation rehabilitation has two goals: 1) return the injured worker to a suitable job (preferably with the employer at the time of injury), and 2) assess the workers earning capacity, based on vocation evaluation, within 1 to 2 years of the date of which wage loss began.

Compensation claims that are over 30 months old and meet certain conditions are classified as long-term disability cases, or Periodic Roll (PR) cases. Once a claimant is determined to be long-term disabled, disability payments are made automatically every 28 days until notice is made to decrease or terminate payments. Once claimants are placed on PR there is no predetermined end date. Long-term disability cases are reviewed intermittently, based on their status, to ensure that pertinent information, such as contact, medical documentation, claimant's work status, and benefit payments are correct. FECA uses the Periodic Role Management (PRM) module in the Sequent System to manage Periodic Roll cases. Savings are generated when DFEC resolves cases as a result of its intermittent review. Cases are resolved when claimant benefits are reduced or terminated due to change in disability, reemployment or death.

APPENDIX B

OBJECTIVE, SCOPE, METHODOLOGY, AND CRITERIA

Objective

To determine the completeness and reliability of indicators one through six reported by the FECA program for DOL performance goal 2.2c.

Scope and Methodology

We conducted our review to determine the completeness and reliability of the CY 2003 performance data submitted via the Sequent System. We selected FECA data from CY 2003 for our review. The FECA data pertained to performance goal 2.2C, Indicators 1-6.

The universe containing all district offices was divided into three strata, high, medium and low based on the number of FECA cases reported during the CY 2003, compiled by the OIG statistician. Two sites were randomly selected from each stratum. Two sites were selected from district offices reporting more than 23,088 cases (Jacksonville, FL and San Francisco, CA), two sites were selected from district offices reporting a range of cases between 22,476 and 9,466 (Washington, DC and Cleveland, OH), and the final two district offices were selected from those district offices reporting a range of less than 8,359 cases (Chicago, IL and Denver, CO) for the CY 2003. Two district offices were selected from each stratum for a total of six offices. The total universe was comprised of 203,718 cases originating from a total of 12 district offices. We reviewed a combined total of 464 cases in the 6 of 12 total district offices visited.

We conducted a walk through of how program personnel and modules within the Sequent System authorize, collect, record, and process reported data for indicators 1-6. We obtained an understanding of the flow of data from origination to reporting of data by the National Office. We also gained an understanding of the internal control procedures in place to ensure completeness and reliability of the reported data.

For indicators 1 and 2, we performed the following tests:

- Verified that approval documentation for the FECA claim existed in each case file.
- Verified that initiation and termination of benefit payment dates were clearly documented in each case file.
- Verified that all cases in the Case Management File (CMF) Module of the Sequent System existed in the district office.

For indicator 3, we verified that rehabilitation data maintained in the Nurse Rehabilitation Tracking Module of the Sequent System were found in the case files.

For indicator 4, we verified that all resolved cases listed in the Periodic Roll Management (PRM) Resolution List had documentation to support the resolution in the case file. We also reviewed the reasons for resolution to determine whether the resolution should be included in FECA's computation of savings generated in the first year.

For indicator 5, we interviewed district office staff to gain an understanding of the procedures in place for the monitoring of payment of medical bills.

For indicator 6, we verified that closed CA-110 (telephone calls received by the district office from claimants) data maintained in the case files existed in the CA-110 Module of the Sequent System. We also verified that CA-110's were resolved in a timely manner (3 days).

The auditors conducted interviews and reviewed claimant files in Cleveland, OH, Jacksonville, FL, San Francisco, CA, Chicago, IL, Denver, CO, and Washington, D.C. We did not issue reports to each district office. Rather, we provided a Statement of Facts (SOF) on the information we gathered to ESA's Director of Office of Workmen's Compensation Programs. ESA indicated agreement with the facts presented by signing the SOF. Weaknesses are discussed in the Assistant Inspector General's Report.

Criteria

The main criteria that govern the work performed are as follows:

- OMB Circular No. A-11 (2004), Section 230.2 which states that agencies are required to assess the completeness and reliability of performance data reported
- OMB A-123, which requires agency managers to incorporate control strategies plans, guidance and procedures that govern their program's operations
- ESA Reviewing Periodic Roll Cases Resource Book, dated 1999, which provides guidance in the maintenance of PRM cases
- Government Accountability Office (GAO) Standards for Internal Control in the Federal Government, November 1999.

ACRONYMS AND ABBREVIATIONS

ACS	Affiliated Computer Services
ACPS	Automated Compensation Payment System
AQS	Agency Query System
BPS	Bill Payment System
CE	Claims Examiner
CFR	Code of Federal Regulations
CMF	Case Management File System
CSR	Customer Service Representative
CY	Calendar Year
DOL	Department of Labor
DFEC	Division of Federal Employees' Compensation
ESA	Employment Standards Administration
FECA	Federal Employees' Compensation Act
FY	Fiscal Year
GAO	Government Accountability Office
GPRA	Government Performance and Results Act
LPD	Lost Production Days
NRTS	Nurse Rehabilitation Tracking System
OASIS	OWCP Automated System for Imaging Service
OIG	Office of Inspector General
OMB	Office of Management and Budget
OWCP	Office of Workers' Compensation Programs
PAR	Performance and Accountability Report
PR	Periodic Roll
PRM	Periodic Roll Management
PRMS	Periodic Roll Management System
QCM	Quality Case Management
RS	Rehabilitation Specialist
SOF	Statement of Facts

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AGENCY RESPONSE TO DRAFT REPORT

U.S. Department of Labor

OFFICE OF INSPECTOR GENERAL
EMPLOYMENT STANDARDS ADMINISTRATION
U.S. DEPARTMENT OF LABOR



SEP 23 2005

MEMORNDUM FOR ELLIOT P. LEWIS
Assistant Inspector General
For Audit

FROM: VICTORIA A. LIPNIC 

SUBJECT: GPRA Data Validation Review—
Federal Employees' Compensation Act (FECA) Program
Draft Audit Report No. 22-05-008-04-431

This responds to your September 19, 2005 memorandum requesting comments on the subject draft audit report. ESA has reviewed the report and our response is attached. We thank you for the opportunity to comment.

If you have any questions concerning this response, please contact Rose Broadwater of my staff on 693-0285.

Attachment

**ESA Response to GPRA Data Validation Review—
Federal Employees' Compensation Act (FECA) Program
Draft Audit Report No. 22-05-008-04-431**

Recommendation

We [OIG] recommend that the Assistant Secretary for ESA:

Ensure the FECA Program excludes cases resolved due to claimants' death from the calculation of savings generated through use of Periodic Roll Management.

ESA Management Response

ESA concurs with the finding that the methodology for calculating Periodic Roll Management (PRM) savings under Performance Goal 2.2C should be modified to exclude savings from benefit payment reductions due to claimant deaths that occurred during the given time period. DFEC has undertaken appropriate action to modify the methodology it applies to this calculation for PRM savings beginning in FY2006.