



U.S. RAILROAD RETIREMENT BOARD

OFFICE OF INSPECTOR GENERAL

Management Information Report

Interim Report Regarding CARES Act Expenditures and Controls

Report No. 20-08

September 28, 2020



What We Found

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), signed into law on March 27, 2020, boosts unemployment and sickness benefits for railroad workers impacted by the pandemic. The Railroad Retirement Board (RRB) has issued over \$147 million in additional unemployment and sickness benefits under the provisions of the CARES Act since May 10, 2020. In addition, the CARES Act awarded the RRB a \$5 million appropriation to prevent, prepare for, and respond to coronavirus, including the purchase of information technology equipment to improve the mobility of the workforce to administer the Railroad Unemployment Insurance Act. RRB approved a plan to purchase and deploy 685 mobile phones to RRB employees to improve mobility of the workforce with this appropriation. We found that 70 percent of the mobile phones acquired to support the RRB workforce during the pandemic are not functioning and the RRB did not intend to make the telephone numbers available internally within the RRB. We also found that the CARES Act benefit payments are being issued without any concurrent verification against state wages and unemployment benefits for the same periods.

What We Recommend

To address the issues regarding mobile phone purchases, we made two recommendations to the Executive Committee to reconsider the need for all RRB employees to have the mobile phones and the related recurring costs and to make the mobile phone numbers available internally.

To address the issues regarding the lack of concurrent matching of CARES Act payments against state benefits, we recommended that the Executive Committee obtain state wage and unemployment data in a timelier manner in order to match against CARES Act RRB payments to identify potential fraud faster and to increase program integrity.

RRB management has concurred with our recommendation to make the mobile phone numbers available but did not concur with the other two recommendations.

What We Did

The Office of Inspector General works to provide oversight to all aspects of agency responsibility, which includes monitoring the implementation of significant provisions of laws and regulations and major projects to identify at-risk situations. Consistent with this approach, we examined the mobile phone purchase and the monitoring of the unemployment and sickness payments for potential fraud in response to the CARES Act.

The objective of this interim review is to provide RRB management with information that will assist them in ensuring compliance, transparency, and fiscal accountability under the CARES Act.

The scope of this review is the RRB's actions and implementation through August 2020 for the purchase and deployment of mobile phones as funded by CARES Act appropriation and controls over CARES Act benefit payments.

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INTRODUCTION

This report presents interim concerns identified by the Office of Inspector General (OIG) as part of our ongoing oversight of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) implementation at the Railroad Retirement Board (RRB).¹ The report addresses concerns about the RRB's purchase and deployment of mobile phones for all employees and concerns about CARES Act benefit payments being issued without any concurrent checks against state wages and unemployment benefits for the same periods. The CARES Act, signed into law on March 27, 2020, boosts unemployment and sickness benefits for railroad workers impacted by the pandemic.

Objective, Scope, and Methodology

The objective of this interim review is to provide RRB management with information that will assist them in ensuring compliance, transparency, and fiscal accountability under the CARES Act.

The scope of this review is the RRB's actions and implementation through August 2020 for the purchase and deployment of mobile phones as funded by CARES Act appropriation and controls over CARES Act benefit payments.

To accomplish the review objectives, we:

- identified criteria for benefit payments from the CARES Act;
- identified and reviewed RRB internal communication and documentation;
- interviewed RRB officials;
- requested and reviewed source documentation from RRB;
- examined documentation for RRB current state wage match agreements and discussed with RRB officials;
- assessed the mobile phone purchase and deployment as it relates to the CARES Act appropriation;
- tested the deployment of a selection of mobile phones; and
- reviewed agency contracts related to mobile phone purchases and deployment.

We conducted our oversight work at RRB headquarters in Chicago, Illinois from March 2020 through August 2020.

¹ Pub. L. No. 116-136 (2020).

Background

The RRB is an independent agency in the executive branch of the Federal Government. The RRB administers the unemployment and sickness insurance benefit programs for railroad workers and their families under the Railroad Unemployment Insurance Act (RUIA). These RRB programs provide income protection in the event of temporary unemployment or sickness. The RRB paid net unemployment-sickness benefits of \$88 million to approximately 23,000 claimants during fiscal year 2019. The maximum biweekly rate for unemployment and sickness benefits was \$780. The RRB has reported an increase in unemployment applications and claims since March 2020 with unemployment claims increasing by over 133 percent by June 2020.

The CARES Act

The CARES Act signed into law by President Trump contains several provisions that affect railroad workers. Under the CARES Act, the one-week waiting period required before railroad workers can receive unemployment or sickness benefits is temporarily eliminated. This change applies to an employee's first 14-day registration period for continuing sickness or unemployment beginning after the effective date of the law and ending on or before December 31, 2020. In addition, the amount of unemployment benefits is increased by \$1,200 per two-week period. This increase is in addition to the current biweekly maximum of \$780 received by most claimants. This increased amount applies to any 14-day registration period beginning on or after April 1, 2020, through July 31, 2020.

Funding provided for the RRB consisted of an appropriation of \$425 million to pay for the increase in unemployment benefits, with an additional \$50 million provided to cover the cost of eliminating the waiting period. If these funds are exhausted, the new provisions will no longer apply. The RRB was also awarded an additional amount of \$5 million, this amount will remain available until September 30, 2021, to prevent, prepare for, and respond to coronavirus, including the purchase of information technology (IT) equipment to improve the mobility of the workforce and provide for additional hiring or overtime hours as needed to administer the RUIA.

The CARES Act also authorizes payment of extended unemployment benefits to rail workers who received unemployment benefits from July 1, 2019, to June 30, 2020. Under the legislation, railroad workers with less than 10 years of service may be eligible for up to 65 days of extended benefits within 7 consecutive 14-day registration periods. Workers with 10 or more years of railroad service, who were previously eligible for up to 65 days in extended benefits, may now receive benefits for up to 130 days within 13 consecutive 14-day registration periods. The payment of these extended unemployment benefits uses remaining funds previously appropriated under the American Recovery and Reinvestment Act of 2009 and the Worker, Homeowner, and Business Assistance Act of 2009.

The RRB's Actions under the CARES Act

The CARES Act granted the RRB the authority to pay extended unemployment insurance benefits, an enhanced unemployment insurance benefit payment or an additional amount of

\$1,200 CARES Act recovery payment (CARP) above the regular unemployment insurance payment, and for the waiting period that occurs when a railroad worker files an unemployment insurance claim or a sickness insurance claim. The CARES Act temporarily waives the first valid waiting period for certain unemployment and sickness claims, making the entire waiting period compensable.

In addition, the CARES Act awarded the RRB a \$5 million appropriation. This amount will remain available until September 30, 2021, to prevent, prepare for, and respond to coronavirus, including the purchase of IT equipment to improve the mobility of the workforce and provide for additional hiring or overtime hours as needed to administer the RUIA.

The RRB chose to distribute the payments under the CARES Act in three phases. The phases corresponded to the different provisions provided under the Act as follows:

- Phase I was implemented for the extended unemployment insurance benefits.
- Phase II was implemented to pay an extra \$1,200 CARP for unemployment benefits.
- Phase III was implemented to pay the days of the waiting period for both unemployment insurance and sickness insurance.

Phase I

The RRB issued the first extended unemployment benefit payments under Phase I on May 10, 2020. The RRB has issued benefits of over \$11 million under this provision through August 2020. Phase I is being funded with money from prior appropriations under the American Recovery and Reinvestment Act of 2009 and the Worker, Homeowner, and Business Assistance Act of 2009 as allowed under the CARES Act.

Phase II

The RRB issued the first CARP enhanced unemployment benefit payments under Phase II on May 28, 2020. The RRB received an appropriation of \$425 million to fund these payments under the CARES Act. The RRB has issued benefit payments of over \$132 million of these benefits through August 2020.

Phase III

The RRB issued Phase III payments for the waiver of the first waiting periods for unemployment and sickness in two releases. The first release began to issue payments for new unemployment and sickness waiting periods and was implemented on July 13, 2020. The second release was for the retroactive payment of the first unemployment and sickness waiting periods and was completely implemented on August 13, 2020. These benefit payments were funded with a \$50 million appropriation under the CARES Act. The RRB has issued benefit payments exceeding \$4 million through August 2020.

OIG Oversight of CARES Act Funds at RRB

On May 15, 2020, the RRB's OIG issued a CARES Act Oversight Plan.² This plan detailed the RRB OIG's plan of action for monitoring agency implementation of the CARES Act and the issuance of the economic considerations. The objective is to provide RRB management with information that will assist them in ensuring compliance, transparency, and fiscal accountability with the CARES Act.

This plan detailed the OIG's planned actions that included reviewing procedures for implementing the provisions of the CARES Act; monitoring the RRB's approved expenditure plans to ensure that they meet the purposes as defined in the CARES Act; and communicating OIG concerns to management's attention timely during the ongoing oversight process.

This interim report is being issued under the oversight plan to provide transparency to the public and to ensure that RRB can review and respond to areas of concern in a timely manner. This report addresses concerns with the use of CARES Act funds for acquiring and deploying mobile phones and the timely mitigation of potential fraud with benefit payments.

² Railroad Retirement Board (RRB) Office of Inspector General (OIG), *Railroad Retirement Board's Office of Inspector General Coronavirus Aid, Relief, and Economic Security Act Oversight Plan* (Chicago, IL: May 15, 2020). *Interim Report Regarding CARES Act Expenditures and Controls* - Report No. 20-08

RESULTS OF REVIEW

This interim report details the review of the mobile phones purchased from the \$5 million appropriation and the lack of a timely comparison of CARES Act benefit payments with state data and contains recommendations for improvement. The full text of management's response to the recommendations is included in Appendix I.

Deployment of Mobile Phones to RRB Employees

The CARES Act included a \$5 million appropriation, to remain available until September 30, 2021, to prevent, prepare for, and respond to coronavirus, including the purchase of IT equipment to improve the mobility of the workforce and provide for additional hiring or overtime hours as needed to administer the RUIA. RRB approved a plan to purchase and deploy mobile phones to RRB employees to improve mobility of the workforce with this funding provided under the CARES Act. RRB approved an operating plan for the \$5 million appropriation under the CARES Act. As part of this plan, the RRB purchased 685 mobile phones that were received in the RRB's inventory as of April 17, 2020. The RRB expected to complete deployment of all the mobile phones by August 31, 2020.

The project to provide mobile phones to all employees has not been effectively managed and requires reconsideration of the recurring costs of each mobile phone. RRB committed to provide mobile phones and the related services for all RRB employees. The plan requires \$398,601 of recurring costs to provide service for the phones. Although the 685 mobile phones have been in the RRB's possession since April 17, 2020, only 204 have been deployed and are functioning (30 percent in 4 months) as of August 2020. The RRB had not planned to make these phone numbers available internally even though they are intended to be a secondary means of communication for RRB employees.

At the onset of the pandemic, the RRB stated that there was uncertainty and many unknowns regarding its ability to support expansion and sustainment of telework for most agency employees. The RRB also stated that the acquisition of mobile phones directly related to the agency's ability to improve and sustain the mobility of its workforce. The RRB indicated that the mobile phones would serve as a secondary means of communications and connectivity to RRB resources to continue work, albeit at a degraded level, should the primary means of communications and connectivity to RRB not be available.

The contract to purchase the mobile phones and the related cellular services was executed on March 31, 2020. On April 28, 2020, the Board approved the proposed operating plan that included funding for the mobile phones and the cellular services. This original operating plan did not include the resources to deploy the mobile phones to RRB employees. The RRB did not award the contract for the mobile phone deployment

process until July 10, 2020. The contract originally required completion by August 31, 2020 for the deployment of a minimum of 500 mobile phones. The contract was subsequently modified to be completed by September 30, 2020.

Although the agency has been teleworking since late March 2020, 70 percent of the purchased mobile phones have not been available for a secondary means of communication as of August 2020. The RRB will incur monthly cellular service costs on mobile phones that are being issued to employees who may not require the mobile phones to perform normal job functions. The ability for the mobile phones to serve as a secondary method of communication and to provide work-at-home users connectivity to RRB resources cannot be accomplished if the mobile phones are not deployed and functioning. Unless the phone numbers are made available internally, they will not facilitate agencywide communication.

Recommendations

We recommend that the Executive Committee

1. reconsider the need for all RRB employees to have the mobile phone and the related recurring costs; and
2. make the mobile phone numbers available internally for the RRB employees since these are considered secondary contact methods.

Management's Comments and Our Response

The Executive Committee (EC) did not concur with recommendation 1. The EC stated that they disagree that the project has not been effectively managed during this pandemic state. The committee indicated that there were many unknowns at the onset of the pandemic regarding the RRB's ability to support and sustain Agency staff operating efficiently and effectively in a maximum telework posture. The acquisition of smart phones directly related to the Agency's ability to improve and sustain the mobility of its workforce. Given the magnitude of the pandemic and the uncertainty of its long-term impact, the EC expects the smart phones to continue as an ongoing secondary means of communication, connectivity and secure access to email.

The OIG's determination of ineffective management of mobile phone project deployment remains unchanged. The RRB's formal response did not provide information that required additional evaluation. Although these mobile phones were intended to be a secondary means of communication during the RRB's extended telework, 481 of the 685 mobile phones had not been deployed or were not functioning as of August 2020. The OIG acknowledges that although the EC commented that additional phones had been deployed, the OIG notes that some of those phones had been assigned, but were not operational so we continue to use the number cited in our finding. In September, we learned that although the contract for mobile phones was to be completed by August 31, 2020, the contract period was extended to September 30, 2020, adding further delay to the complete deployment. Although the agency continues its extended telework posture, the agency could potentially begin to reopen in

October 2020, with some reduction in telework. For these reasons and the continued inability to use most of these phones as a secondary means of communication for five months after purchase is the basis for our recommendation, which remains unchanged. The OIG acknowledges that the RRB provided written comments to our notice of finding and recommendation on August 20, 2020. That response was not the formal response, and therefore was not discussed in our report.

EC concurred with recommendation 2 and agrees to make the iPhone telephone numbers for RRB employees available internally as a secondary contact number for Agency staff by October 31, 2020.

Timely Comparison of CARES Act Payments to State Data

The RRB issued over \$147 million in additional unemployment and sickness benefits under the provisions of the CARES Act since May 10, 2020. These benefit payments are being issued without any concurrent checks against state wages and unemployment benefits for the same periods. The RRB's strategic plan includes a goal to effectively serve as responsible stewards and to take appropriate action to safeguard the funds used for benefit payments. The RRB's strategic plan also states that they are committed to paying the right benefits to the right people and they have measures in place to track the accuracy of processing actions for the RUIA.

On April 3, 2020, the Inspector General inquired about internal program integrity controls the RRB plans to implement prior to CARES Act payments. The RRB indicated that no additional controls from those currently in place were being implemented. The RRB's current state wage matching program will not begin to compare the RRB's CARES Act payment to state wage and benefit data for at least six months depending on the schedule with each particular state. On June 3, 2020, the RRB indicated that the state wage match runs, that contain payments under the CARES Act, will begin in the spring of 2021 and will be completed by the end of calendar year 2021.

Recent inquiries by the OIG's Office of Investigations determined that the RRB is not currently performing recoveries and expects that most of the potential fraud cases will be identified from the state wage match program. The RRB acknowledged that there is lag period with these cases so it may be a couple months before they are identified.

Federal agencies have issued press releases addressing increased fraud in unemployment benefits issued under the CARES Act. The Department of Labor indicated that the integrity of the unemployment insurance system, including the new unemployment insurance programs under the CARES Act, is critical to ensure that temporary benefits are provided only to eligible claimants. The Federal Bureau of Investigation issued a press release on July 6, 2020, indicating that they have seen a spike in fraudulent unemployment insurance claim complaints related to the ongoing COVID-19 pandemic involving the use of stolen

personally identifiable information. The RRB determined that if a covered employee is receiving benefits under the RUIA, then section 4 (a-1) (ii) of the RUIA, 45 U.S.C. § 354 (a- 1) (ii), disqualifies a covered railroad employee from receiving benefits for any day in a period for which the employee also receives social insurance payments, unemployment, maternity, or sickness benefits under any other law. It is the RRB's opinion that Pandemic Unemployment Assistance payments would constitute unemployment benefits under any other law and would disqualify a railroad employee from receiving RUIA benefits for the same period.³

The RRB's state wage match program is operating based on previously negotiated agreements that are not providing wage and unemployment data in a timely manner and because of the timing decrease program integrity of the CARES Act benefit payments. This extensive lag period severely impedes the timely identification of fraudulent situations under the CARES Act.

During this period of increased benefits under the CARES Act, the RRB cannot wait until it performs the regularly scheduled reviews provided by the current state wage match program. The RRB's ability to recover fraudulent benefit payments is diminished the longer it takes to identify those payments.

Recommendation

We recommend that the Executive Committee

3. obtain state wage and unemployment data in a timelier manner in order to match with CARES Act RRB payments; thereby identifying potential fraudulent CARES Act payments quicker and increasing program integrity.

Management's Comments and Our Response

The EC did not concur with recommendation 3. The EC stated that they disagree with the assertion that the RRB's ability to recover fraudulent benefit payments is diminished because of the timing of the State Wage Match program. The committee explained that State Wage matches are done two times per year with each State, except for New York, which is conducted four times per year. They also match twice yearly with the District of Columbia. The States must first receive and post payroll/wage records from the employers within their States. It is their understanding that States may receive the data quarterly, but each State has a different timeframe for uploading the information. Illinois, for example has informed them that it is six to nine months after the quarter ends before the data is loaded. Other states indicated that it can be one month to ten weeks after the quarter ends before new data is uploaded. The EC stated that the RRB has no control over how quickly each State updates their internal records. To conduct matches more frequently would require renegotiating 51 separate agreements, would be more costly and would not provide data that is more relevant. Further, the RRB is able to

³ The Coronavirus Aid, Relief, and Economic Security Act also created a new temporary federal program called Pandemic Unemployment Assistance. This program is administered by the States, not by RRB.

determine eligibility for benefits based on our own internal records. The agency provides for pre-payment verification with the railroad employer for each unemployment and sickness claim they receive. The railroad employer has three days to refute an unemployment or sickness claim for anyone who may be currently working. This procedure allows the RRB to identify railroad employees who attempt to claim benefits while still working at a railroad, and could potentially expose instances of identity theft. The current State Wage Match program would identify those workers who obtain employment outside of the railroad industry while also claiming RRB benefits by the timeliest means available. Given the lag in the upload of data by the States and their own internal procedures prior to the payment of an unemployment benefit, the EC non-concurs with this recommendation.

The OIG's finding remains unchanged. The RRB's formal response did not provide information that required additional evaluation. The lack of timely matching of CARES Act payments with state data requires the RRB to perform some additional procedures outside of the normal state wage matching process. Although the agency responded that renegotiating 51 separate state wage match agreements would be costly and would not provide data that is more relevant, the RRB received CARES Act funds that could be used for the renegotiation fees. In addition, given prevalent fraud for CARES Act benefits in general, RRB management cannot know for certain that the costs would not be beneficial. Due to RRB management's non-concurrence with this recommendation that would increase program integrity and could identify potential fraud, RRB management can be viewed as being unmindful of their duties to achieve their mission that includes appropriate action to safeguard the RRB trust funds. Also, although the agency discusses their pre-payment verification control where information is obtained from the railroad employer, the information provided by the railroad employer is not comparable to information that is needed from the States. To establish a better control over CARES Act payments to identify potential fraud, RRB could concentrate on obtaining timelier data from those states with the largest railroad employment with the majority of railroad workers. OIG analysis of unemployment insurance applications for April and May of 2020 is that over 80 percent of applications filed were for four railroad employers. The states where those workers reside would represent the majority of unemployment insurance claims filed. As such, we continue to see the need for our recommendation. The OIG acknowledges RRB provided written comments to the Notice of Finding and Recommendation on September 4, 2020. That response was not the formal response, and therefore was not discussed in our report.

APPENDIX I: MANAGEMENT COMMENTS



UNITED STATES GOVERNMENT
MEMORANDUM

FORM G-1157 (1-92)
RAILROAD RETIREMENT BOARD

September 23, 2020

TO: Debra Stringfellow-Wheat
Deputy Assistant Inspector General for Audit

FROM: Daniel J. Fadden
Senior Executive Officer/Director of Field Service

DANIEL FADDEN Digitally signed by DANIEL FADDEN
Date: 2020.09.23 08:50:37 -05'00'

SUBJECT: Draft – Interim Report Regarding CARES Act Expenditures and Controls

Regarding the draft – Interim Report Regarding CARES Act Expenditures and Controls, please refer to the response below on behalf of the Executive Committee to the cited recommendations:

The Executive Committee Non-Concurs with Recommendation No. 1: Reconsider the need for all RRB employees to have the iPhone and the related recurring charges.

We disagree that the project has not been effectively managed during this pandemic state. As the OIG noted above, there were many unknowns at the onset of the pandemic regarding the RRB's ability to support and sustain Agency staff operating efficiently and effectively in a maximum telework posture. The acquisition of smart phones (iPhones) directly related to the Agency's ability to improve and sustain the mobility of its workforce.

Given the magnitude of the pandemic and the uncertainty of its long-term impact, the EC expects the smart phones (iPhones) to continue as an ongoing secondary means of communication, connectivity and secure access to email. For these reasons, we non-concur with this recommendation.

Management does not concur with the finding and Recommendation No. 1

The Executive Committee Concurs with Recommendation No. 2: Publish the iPhone numbers for the RRB employees since these are considered secondary contact methods.

The Executive Committee agrees to make the iPhone telephone numbers for RRB employees available internally as a secondary contact number for Agency staff by October 31, 2020.

Management concurs with the finding and Recommendation No. 2

The Executive Committee Non-Concurs with Recommendation No. 3: We recommend that the Executive Committee obtain state wage and unemployment data in a timelier manner in order to match with CARES Act RRB payments; thereby identifying potential fraudulent CARES Act payments quicker and increasing program integrity.

*We disagree with the assertion that the RRB's ability to recover fraudulent benefit payments is diminished because of the timing of the State Wage Match program. State Wage matches are done two times per year with each State, except for New York, which is conducted four times per year. We also match twice yearly with the District of Columbia. The States must first receive and post payroll/wage records from the employers within their States. It is our understanding that States may receive the data quarterly, but each State has a different timeframe for uploading the information. Illinois, for example has informed us that it is six to nine months after the quarter ends before the data is loaded. Other states that we have contacted indicates that it can be one month to ten weeks after the quarter ends before new data is uploaded. We have no control over how quickly each State updates their internal records. To conduct matches more frequently would require renegotiating 51 separate agreements, would be more costly and would not provide data that is more relevant. Further, the RRB is able to determine eligibility for benefits based on our own **internal** records. The agency provides for pre-payment verification with the railroad employer for each unemployment and sickness claim we receive. The railroad employer has three days to refute an unemployment or sickness claim for anyone who may be currently working. This procedure allows the RRB to identify railroad employees who attempt to claim benefits while still working at a railroad, and could potentially expose instances of identity theft. The current State Wage Match program would identify those workers who obtain employment outside of the railroad industry while also claiming RRB benefits by the timeliest means available.*

Given the lag in the upload of data by the States and our own internal procedures prior to the payment of an unemployment benefit, we non-concur with this recommendation.

Management does not concur with the finding and Recommendation No. 3

Lastly, I would be remiss in noting this draft report failed to reference or acknowledge the responses previously received on August 20, 2020 and September 4, 2020 from the Executive Committee to the Notice of Findings and Recommendations (NFR). These prior responses included concurrence from the Executive Committee with Recommendation No. 2 which was missing in this draft report, as well as the updated number of iPhones deployed to Agency staff provided during the meeting requested by OIG on August 19, 2020.

cc: Crystal Coleman, Director of Programs
Keith B. Earley, Director of Administration
Ana M. Kocur, General Counsel
Terryne F. Murphy, Chief Information Officer
Shawna R. Weekley, Chief Financial Officer
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