



## **Employee Benefits Security Administration**

### **Performance Audit of the Thrift Savings Plan Participant Support Process**

**As of August 14, 2009**

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## EXECUTIVE SUMMARY

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Washington, D.C.

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As a part of the U.S. Department of Labor Employee Benefits Security Administration (EBSA) Fiduciary Oversight Program, we conducted a performance audit of the Thrift Savings Plan (TSP) participant support process. Our fieldwork was performed from April 6, 2009 through August 14, 2009, primarily at the Federal Retirement Thrift Investment Board's (the Board) Staff (Agency) headquarters in Washington, DC, and the two TSP call centers located in Virginia and Maryland. Our scope period for testing was January 1, 2008 through March 31, 2009.

We conducted this performance audit in accordance with the standards applicable to such audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Criteria used for this engagement is defined in EBSA's *Thrift Savings Plan Fiduciary Oversight Program*, which includes the Federal Employees' Retirement System Act of 1986 (FERSA), as amended; applicable Board regulations and bulletins; and certain provisions of call center contracts. The detailed objectives of this engagement are enumerated within Section I.A.

The audit included assessing the Agency's TSP participant support process to determine if (1) controls were in place for providing TSP participants with accurate and timely account information; (2) controls were in place for the timely and accurate processing of participants' inquiries; and (3) confirmation and reject notices were processed accurately and timely. As part of (2) above, we assessed the call centers' service and performance and the Agency's call center oversight functions. In addition, we determined the status of all prior EBSA TSP

recommendations and concluded upon compliance of the Agency's TSP participant support process with FERSA, applicable Agency policies, and certain provisions of call center contracts.

Overall, based on the interviews conducted (Appendix A), documentation inspected (Appendix B), and test procedures performed in accordance with EBSA's *Thrift Savings Plan Fiduciary Oversight Program*, we conclude that the Agency's TSP participant support process complies with FERSA, applicable Board regulations and bulletins, and certain provisions of call center contracts. We also noted that the Agency has implemented certain procedures to (1) provide TSP participants with accurate and timely account information, (2) process participants' inquiries timely and accurately, and (3) process confirmation and reject notices accurately and timely. However, we noted internal control weaknesses in several areas that could adversely affect this TSP process.

We report nine new recommendations from this audit for the Agency's consideration to address the internal control weaknesses noted above. Seven recommendations address fundamental controls<sup>1</sup> while the remaining two address other (i.e., non-fundamental) controls. The fundamental control recommendations include 1) Logical Access Controls at the Maryland Call Center Should Be Strengthened, 2) Logical Access Controls at the Virginia Call Center Should Be Strengthened, 3) Maryland Call Center Technology Weaknesses Should Be Addressed, 4) Virginia Call Center Technology Weaknesses Should Be Addressed, 5) Maryland Call Center Physical Access Controls Need to Be Strengthened, 6) Virginia Call Center Physical Access Controls Need to Be Strengthened, and 7) Information Privacy Requirements Should Be Enforced at the Call Centers. The other control recommendations include 1) Participant Written Inquiries Process Should Be Strengthened, and 2) Congressional Inquiries Process Should Be Strengthened. Timely implementation is requested to strengthen identified management and operational controls.

We also assessed the status of four prior recommendations from two separate audits. One prior year recommendation was reported in the "Post Implementation Review of the New Thrift Savings Plan Recordkeeping System, December 12, 2003," and was closed during the current engagement. The other three prior year recommendations were reported in the "Review of the Thrift Savings Plan Call Center at SI International<sup>2</sup>, September 30, 2006." One of these

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<sup>1</sup> As defined by EBSA, fundamental control recommendations address significant procedures or processes that have been designed and operate to reduce the risk that material intentional or unintentional processing errors could occur without timely detection or that assets are inadequately safeguarded against loss.

<sup>2</sup> SI International was purchased by Serco Inc. during calendar year 2008.

recommendations has been implemented and closed, and the other two recommendations have been partially implemented but have been closed and incorporated into current year recommendations. Section III.B documents the status of these prior recommendations.

Section I of this report discusses the EBSA's objectives, scope and methodology, and report organization. Section II is an overview of the TSP participant support process. Section III presents the details that support the current year and the status of prior year findings and recommendations. In Appendices A and B, we identify the key personnel with whom we met and the documentation provided by the Agency and contractor personnel that we reviewed, respectively, during our performance audit. We discussed these recommendations with the appropriate Agency representatives (Appendix C). Final Agency comments, including the Executive Director's formal reply, are included as an appendix within this report (Appendix D).

This performance audit did not constitute an audit of the TSP's financial statements in accordance with *Government Auditing Standards*. KPMG was not engaged to, and did not render an opinion on the Agency's internal controls over financial reporting or over financial management systems (for purposes of the Office of Management and Budget's Circular No. A-127, *Financial Management Systems*, July 23, 1993, as revised). KPMG cautions that projecting the results of this audit to future periods is subject to the risks that controls may become inadequate because of changes in conditions or because compliance with controls may deteriorate.

**KPMG FIRM SIGNATURE**

\_\_\_\_\_, 2009

## **I. INTRODUCTION**

### **A. Objective**

The U.S. Department of Labor (DOL), Employee Benefits Security Administration (EBSA) engaged KPMG LLP (KPMG) to conduct a performance audit of the Thrift Savings Plan (TSP) participant support process.

The specific objectives of this engagement were to:

- Determine if quarterly statements are prepared for participants, which reflect the activity for the period;
- Determine if annual statements are prepared for participants, which summarize all transactions made during the previous calendar year by transaction type;
- Determine if participants' inquiries are responded to in an accurate and timely manner;
- Determine if Congressional inquiries are responded to in an accurate and timely manner;
- Determine if information distributed to participants concerning the TSP, including their statement of account activity, is timely and accurate;
- Determine if confirmation and reject notices are processed accurately and sent out in a timely manner;
- Determine if participant support activities are monitored and customer service issues are tracked and resolved timely;
- Determine if policies are established which require adequate participant information to be available timely to participants and beneficiaries for informed decision making;
- Assess each call center's service and performance (customer feedback and surveys, service delivery, performance metrics, training and professional development programs, and technology support tools);
- Assess the Federal Retirement Thrift Investment Board's Staff's (the Agency) call center oversight functions (call volume/load management, service level management/benchmarking, contract management and vendor selection, communication management, information security and Privacy Act requirements, and management reporting);
- Assess the call center security and data management practices (physical access, logical access, information security and Privacy Act implementation, background investigations and non-disclosure agreements); and
- Follow-up on findings and recommendations from certain prior reports.

## **B. Scope and Methodology**

We conducted this performance audit in accordance with EBSA's *Thrift Savings Plan Fiduciary Oversight Program*, which is designed to comply with *Government Auditing Standards* issued by the Comptroller General of the United States. In particular, we conducted our engagement as a performance audit defined by *Government Auditing Standards* as an "objective analysis so that management and those charged with governance and oversight can use the information to improve program performance and operations, reduce costs, facilitate decision making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability." We performed our engagement in four phases: (1) planning, (2) arranging for the engagement with the Agency; (3) testing and interviewing, and (4) report writing.

The planning phase was designed to help assist team members to develop a collective understanding of the activities and controls associated with the applications, processes and personnel involved with TSP operations. Arranging the engagement included contacting the Agency and agreeing on the timing of detailed testing procedures.

During the testing and interviewing phase, we conducted interviews, collected and inspected auditee-provided documentation and evidence, participated in process walk-throughs, and designed and performed tests of controls and compliance. We conducted these test procedures primarily at the Agency's headquarters in Washington, DC, and the two TSP call centers located in Maryland and Virginia.

Additionally, our performance audit procedures included testing non-statistical samples of the following:

- Participant statements, to determine if participants receive accurate account information;
- Written inquiries, to determine that participant written inquiries are tracked and responded to in an accurate and timely manner;
- Congressional inquiries, to determine if Congressional inquiries are tracked, forwarded to the Agency (if received by the contractor), and responded to in an accurate and timely manner;
- Confirmation notices, to determine if confirmation notices are processed accurately and sent out in a timely manner;
- Reject notices, to determine if reject notices are processed accurately and sent out in a timely manner;

- New hires, individuals with access to the TSP-dedicated portion of each call center's Local Area Network (LAN), individuals with access to the TSP-dedicated sections of the call centers, and separated individuals, to assess logical and physical access controls at both call centers; and
- Call center employees, to assess the enforcement of certain training and contract on-boarding requirements at both call centers.

We performed the tests above using judgmentally, rather than statistically, determined sample sizes. Accordingly, our conclusions are applicable to the sample we tested and were not extrapolated to the population.

The report writing phase entailed drafting a preliminary report, conducting an exit conference (Appendix C), providing a draft report to the Agency for comment, and preparing and issuing the final report.

### **C. Organization of Report**

Section II presents an overview of the TSP, the TSP service providers, and the participant support process. Section III presents a detailed discussion of all recommendations.

## **II. OVERVIEW OF THE PARTICIPANT SUPPORT PROCESS**

### **A. The Thrift Savings Plan**

Public Law 99-335, the Federal Employees' Retirement System Act of 1986 (FERSA), as amended, established the Thrift Savings Plan (TSP). The TSP is the basic component of the Federal Employees' Retirement System (FERS) and provides a Federal (and, in certain cases, state) income tax deferral on employee contributions and related earnings. The TSP is available to Federal and Postal employees, members of Congress and certain Congressional employees, and members of the uniformed services. For FERS participants, the TSP also provides agency automatic 1 percent and matching contributions. The TSP began accepting contributions on April 1, 1987, and as of June 30, 2009, had reported approximately \$215 billion in assets and approximately 4.1 million participants<sup>3</sup>.

The FERSA established the Federal Retirement Thrift Investment Board (the Board) and the position of Executive Director. The Executive Director and the members of the Board are named TSP fiduciaries. The Executive Director manages the TSP for its participants and beneficiaries. The Board's Staff (the Agency) is responsible for administering TSP operations.

### **B. The TSP Service Providers**

Several organizations provide significant TSP services for the Agency under a Memorandum of Understanding (MOU) or contract. These organizations provide maintenance and operations support and disaster recovery capability for the TSP record keeping system (TSP system), certain record keeping services, call center services, and other services. The record keeping services include establishing and maintaining individual TSP participant accounts and generating reports for all payroll offices so that they can reconcile the information processed by the TSP system with information in their systems and correct transactions rejected by the TSP system.

The TSP, through its service providers, are also responsible for processing withdrawal and loan requests, disbursing participant TSP loans, and processing loan payments withheld from participants' pay by the participants' payroll office.

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<sup>3</sup> Source: Minutes of the July 20, 2009 Board meeting, posted on [www.frtib.gov](http://www.frtib.gov).

Participants formally receive quarterly statements of TSP account activity from the TSP, through its service provider, electronically (default) or via hard copy (upon request). In addition, all participants receive an annual participant statement through the mail unless they opt out of the service. It is each participant's responsibility to determine that his/her TSP account activity is correct.

When participants retire or transfer, their employing agency or service is responsible for reporting the change in employment status to the TSP. Separated participants inform the TSP directly of other changes in circumstances, such as address or marital status. Additionally, such participants should contact the TSP if questions arise.

### **C. The Federal Agencies and Uniformed Services**

Federal agencies and the uniformed services have a responsibility to provide timely and accurate participant account information to the TSP. As part of this responsibility, agencies and services provide, receive, and process participant contributions election forms. Federal agencies and services calculate employee and agency contributions and process deductions from employees' pay for contributions and loan repayments. Information for all active, recently separated, and transferred participants is submitted primarily electronically to the TSP each payroll period.

Federal agency payroll offices and uniformed services are also required to submit an Employee Data Record (06-Record) containing an appropriate separation code and date to the TSP when an employee or member separates from government service. The separation code and date provides the TSP system with information necessary to complete the processing of TSP withdrawals. Federal agency personnel offices and uniformed services are also responsible for distributing withdrawal forms or information to participants. Participants can also obtain forms and publications from the TSP website, ThriftLine, or a TSP Participant Support Representative.

### **D. Overview of the TSP Participant Support Process**

Participant support involves providing TSP participants and beneficiaries with information about their TSP accounts and plan benefits. This process includes distributing participant statements and other communications materials as well as answering participant inquiries.

Generally, Federal employees and uniformed services members are initiated to the TSP through contact from their employer's personnel offices. Federal agency and uniformed service personnel

offices are the primary TSP contact point for actively employed TSP participants. Federal agency and uniformed service personnel offices provide the following participant support functions:

- Inform all eligible employees/members of TSP options and benefits;
- Maintain adequate supplies of participant TSP election forms (if used by the employer)<sup>4</sup>, booklets, and publications to facilitate participation;
- Determine retirement coverage;
- Provide and collect TSP election forms (TSP-1<sup>5</sup>);
- Process and submit TSP election forms to Federal agency and uniformed service payroll offices;
- Provide loan materials;
- Provide counseling and withdrawal information to TSP participants who are leaving Federal service; and
- Respond to inquiries about the TSP from active employees and members. (The TSP call centers' are the primary point of contact for participants who have left Federal service. The centers also handle inquiries about loans, investment allocations, in-service withdrawals, and other benefits received from active participants.)

Inquiries that the Federal agency and uniformed service personnel or payroll office cannot answer and inquiries from separated participants or beneficiaries are directed primarily to the TSP call centers. With respect to active participants, either personnel or payroll offices can contact the call centers or the Agency on behalf of the participants or the participants can contact the TSP call centers directly, depending on the issue. Both the Agency and the call centers have direct contact with participants and beneficiaries by mail and by telephone. The Agency works with the call centers to coordinate information needed to answer participants' inquiries.

The TSP correspondence unit at the Virginia call center is responsible for responding to written inquiries received from participants, beneficiaries, and third parties (e.g., financial institutions, attorneys, and other Federal agencies). While some inquiries (e.g., those involving contribution issues) from active participants are referred to their employing agencies or services for assistance, many others (e.g., questions about interfund transfers, contribution allocations, loans,

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<sup>4</sup> Many agencies and services use automated self-service systems for enrollment in the TSP as well as other benefit programs. Therefore, activities associated with the processing of TSP election forms may vary among employers.

<sup>5</sup> Forms used by the uniformed service members are numbered the same as for civilians except they are denoted by a "U." For example, the Form TSP-1 for the uniformed services is Form TSP-U-1.

or in-service withdrawals) are handled by the call center since the employing agencies and services have little or no involvement in these program areas. In cases of third party inquiries, information is released consistent with the Privacy Act requirements as provided by the Agency.

Once the assigned correspondence agent begins work on the correspondence, he or she is responsible for resolving the inquiry and responding to the participant, either via a phone call or letter. The correspondence agent first reviews the correspondence for completeness. Participants who do not adequately complete their inquiry requests will receive form letters requesting more information. However, if an inquiry is only missing the participant's account number (or Social Security Number), the correspondence agent performs a search through the Participant Service Representative (PSR) application using the participant's name. The correspondence agent then researches the inquiry and returns an appropriate response to the participant. Third party inquiries are completed under different rules, depending upon the nature of the request, but the process is generally the same.

Congressional inquiries are those inquiries made by members of Congress, or their staff, usually on behalf of a constituent. The Agency handles all Congressional inquiries. The Agency logs these inquiries in the same manner as regular correspondence. Although most of the correspondence is referred to the Office of External Affairs for response, the Office of Participant Services may assist with research and resolving issues or drafting the letters, as needed.

During calendar year 2008, the TSP processed approximately 2.3 million TSP participant telephone and approximately 70,000 written inquiries. The TSP most frequently processes inquiries regarding withdrawal information. During calendar year 2008, inquiries related to this area accounted for 35 percent of all inquiries processed by the TSP.

Exhibit II-1<sup>6</sup> illustrates the number of written and telephone inquiries processed by the TSP during calendar years 2004 through 2008. Exhibit II-2<sup>6</sup> divides the total inquiries processed by the TSP during calendar year 2008 by type of transaction.

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<sup>6</sup> Source: Federal Retirement Thrift Investment Board

Exhibit II-1

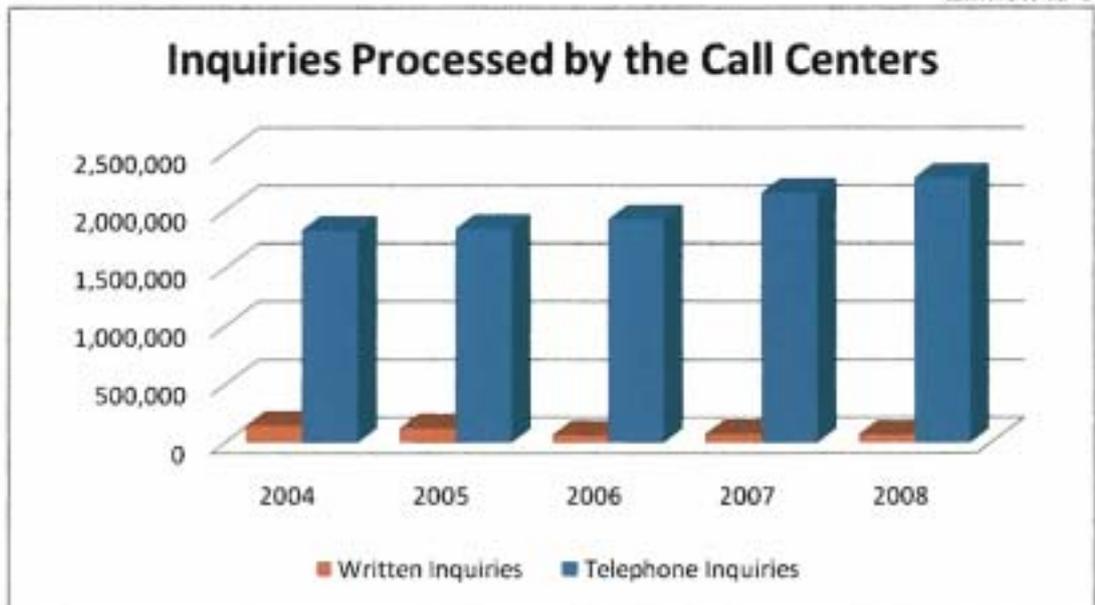
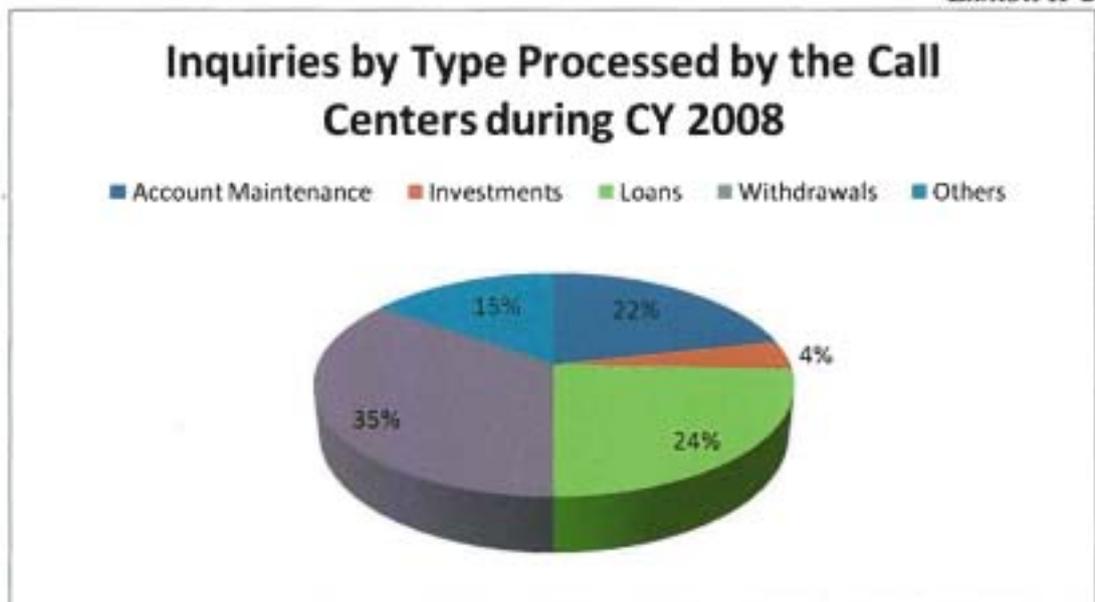


Exhibit II-2



## **E. Description of the TSP Call Centers**

### **1. Overview of the Call Center Operations**

Participants with questions concerning their TSP accounts (e.g., account status, loan request status, interfund transfers, and contribution allocation changes) access the automated ThriftLine, access the TSP web site ([www.tsp.gov](http://www.tsp.gov)), or mail correspondence to the TSP. By dialing the ThriftLine's toll-free number (1-877-968-3778), a participant can opt to talk to a call center PSR. The call is routed to one of the two call centers, based on an Agency pre-determined call-volume load setting, through its telecommunications provider. While the inbound call volumes generally are divided between two call centers, the Maryland call center exclusively handles the Telecommunications Device for the Deaf (TDD) calls since the service has a unique telephone number. Participants can access a PSR during the hours of operation which are 7:00 am to 9:00 pm eastern time, Monday through Friday.

The two competitively selected call centers are staffed by a call center manager and deputy, supervisors and team leads, helpdesk personnel, quality assurance coordinators, trainers, workforce operations staff; and administrative support personnel. Depending upon the center, IT support may be dedicated to the TSP project or shared with other contracts. Each center determines its own staffing complement based on forecasted call volumes, management requirements, and work to be performed. The Virginia call center is a Government owned/Contractor operated (GOCO) facility while the Maryland facility is a Contractor owned/Contractor operated (COCO). As a result, some operational differences exist. However, wherever possible, both centers operate the same, using the same performance metrics and requirements, call center technology, knowledge database, and materials. The goal of the Agency is to achieve transparency for participants so they receive a consistent experience regardless of which call center they reach.

The PSR's primary task is to answer inbound inquiries from the TSP participants. Before a PSR can take live phone calls, he or she must successfully complete a training course consisting of TSP program specific information, use of the TSP applications (e.g., PSR and PowerImage), and additional customer service skills training. Selected senior PSRs (e.g., team leads and the helpdesk personnel) hold additional responsibilities such as performing research requests for issues that cannot be resolved on first contact and handling escalations. The primary responsibility of supervisors is to supervise floor operations, which includes the managing of performance metrics (i.e., service level is being achieved) that are reported via the Symposium

Automated Call Distribution (ACD) software and directing the PSRs. In addition, supervisors monitor live and recorded phone calls, document personnel actions and coaching sessions, take escalated calls, supervise research and fulfillment functions, and schedule work shifts. Supervisors are supplemented with team leads, which is a term used to describe senior PSRs who can perform supervisory duties related to assisting other PSRs, such as coaching, call monitoring, and handling escalations. The deputy call center manager serves as a backup to the call center manager and is responsible for floor operations, managing the quality assurance function (e.g., the monitoring of phone calls, follow-up coaching, and performance appraisals), managing the research and fulfillment functions, and reporting technical issues. The call center manager is responsible for the overall contract performance. Processes are in place for the call center manager to evaluate operations performance as it pertains to contractual requirements (i.e., the achievement of contract performance standards).

#### a. Technology Infrastructure

The call centers each house the application servers for workforce forecasting, call volume and performance monitoring, and call recording and archiving software. In addition, each center has two Voice Response Unit (VRU) servers which handle inbound calls with a current maximum call handling capacity of 164 concurrent calls. One server is active at any time with the other VRU serving as a backup. Physical access to the data centers is controlled through the use of electronic badges.

As toll-free calls arrive at the telecommunications provider network, the call is presented to a Nortel Meridian 1 private branch exchange (PBX) and is offered to the ThriftLine VRU. Participants have the option to stay within the ThriftLine or opt out to speak with a PSR. If the participants stay within the ThriftLine, they may conduct their business through automated functions. If the participants choose to speak with a PSR, several processes occur using the VRU, Computer Telephony Integration (CTI) software, and Nortel Symposium software to transfer the call to the PSR:

- The VRU uses information provided by the participant to access OMNIPlus<sup>7</sup>. When the participant information is retrieved from the VRU request (i.e., participant enters his account number), the information is queued in the CTI software.

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<sup>7</sup> OMNIPlus is the core record keeping engine for the TSP system.

- The CTI software queues the record for the PopPSR software to provide the PSR with a “screen-pop” of the participant’s account information.
- After this information is retrieved, the Nortel Symposium system routes the call to the next available PSR.

All participant calls are recorded by the Versadial server. The Virginia call center uses two, 500 Gigabyte (GB) hard drives to record calls, and the Maryland call center uses five, 32-GB hard disk partitions. All calls to the Virginia call center are recorded and stored on the removable hard drives and taken offsite to a safety deposit box at a nearby financial institution. The Maryland calls are recorded to CD/DVDs and are currently kept onsite.

#### b. Human Resources

Each call center employs its company’s global processes for hiring, recruiting, and performance evaluation. These human resource processes are not specific to the Agency account; they apply to all company employees consistent with their contracts. Generally, the call centers fill PSR positions for the Agency’s call center functions using both outside applicants and current employees who may be working on other contracts, as appropriate. The Virginia call center uses a local government employment office as well. Applicants complete an application and receive an aptitude test, and are either interviewed by supervisors or human resource personnel, or a team of interviewers consisting of members of staff/supervisor and/or human resource personnel. Interview sessions focus on identifying the candidate’s suitability for the position. An emphasis is placed on proficiency with computers, handling difficult customers, work history, additional skills or experience (e.g., previous positions in the financial sector), and start date availability, to determine if the candidate is qualified for the position. Once a candidate is considered for employment, a background investigation is required for that individual to work on the TSP contract. In addition, all new hires must sign the Agency’s nondisclosure/confidentiality agreement.

Job descriptions contain minimum experience requirements and/or special skills. A PSR must have prior call center experience or complex customer service experience and must have earned a high-school degree or equivalent diploma. Experience requirement become progressively more rigorous for helpdesk, team lead, supervisory, operations, and management positions. All new hires receive an employee handbook containing the company’s human resource policies and procedures.

All new PSRs are subject to a 90-day probation period after they are hired. The 90-day probationary review focuses on three areas: performance (i.e., quantity and quality of work); adaptability (i.e., to the work environment and co-workers); and dependability (i.e., arrives to work on time and no excessive leave). This is a standard set of probationary evaluation criteria used by both call centers. If deficiencies are identified during the probationary period review, additional coaching is provided to the PSR in an effort to improve his or her performance.

At the completion of the probationary period, the PSR's supervisor and the call center manager review his or her performance and determine whether to continue employment, extend the probationary period, or terminate employment.

## **2. Customer Service Delivery**

The call center is an important option for participant interaction with the TSP. Each interaction directly influences the participant's perception of customer service; for example, the length of time it takes to talk with a PSR, the ability of a PSR to answer participant questions, and the quality of communication during the interaction can influence the participant's perceptions towards the quality of service. As such, the ultimate success of a call center operation depends on the proper blend of people, implemented processes, and enabled technologies, employed together towards consistent customer service. The TSP's call centers' service delivery and customer service capabilities and performance can be separated into the following areas: a) Customer Feedback; b) Service Delivery Processes; c) Performance Metrics; d) Training and Personnel Programs; and e) Technology Support.

### **a. Customer Feedback**

Customer feedback is useful for gaining an understanding of customer satisfaction levels with the TSP. A traditional method for soliciting feedback is the use of surveys.

The Agency has a Customer Satisfaction survey process (introduced in December 2004) and a Quality Assurance (QA) program (introduced in September 2004) to collect and analyze customer feedback through the call centers. Both programs were developed with the assistance of the International Customer Management Institute (ICMI)<sup>8</sup> consulting group and are currently maintained with the assistance of the ICMI consulting group and ServiceAgility. The Agency,

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<sup>8</sup> Formerly the Incoming Calls Management Institute

ServiceAgility, and the call centers tested a revision of the QA program, which was implemented in July 2009. The modifications (primarily to the QA form) were based on the experiences and observations of the past several years.

The QA program consists of quality monitoring sessions performed by quality assurance coordinators. Quality assurance coordinators randomly select a pre-determined number of recorded calls to listen to so they can review each PSR's activity each month (e.g., 3 to 5 per month for new hires and 2 per month for experienced PSRs). The quality monitoring software, Click2Coach, records the audio and screen shot activity of the call. Each PSR's every third call is recorded each day. The quality assurance coordinator selects and evaluates calls using her experience with the program and customer service training, and scores attributes of the call under the categories of foundation skills (i.e., opening/greeting, data quality, professional etiquette, and the conclusion) and finesse skills (i.e., call management/listening, program knowledge, and communication skills/customer responsiveness).

Calls are scored using a rating scale of 0 = unsatisfactory; 1 = needs improvement; 2 = satisfactory; 3 = outstanding; and N/A = not applicable for this call. In addition, quality assurance coordinators and supervisors conduct periodic calibration sessions where all personnel who perform quality monitoring duties will listen to and score a call, compare the results, and discuss the differences in monitoring approach. Monthly, a joint calibration session is conducted with Agency staff and personnel from both call centers. The calibration sessions are intended to create a common baseline for evaluating and scoring the calls regardless of the individual who performs the monitoring. Once the calls have been monitored and scored, the evaluation form is given to the PSR's supervisor for follow-up coaching.

The designated manager, QA staff member, or supervisor also conducts an outbound telephone customer satisfaction survey for the call monitored. Surveys are only to be conducted on those calls that have been monitored for quality assurance purposes. The results of the monitored call are compared to the results of the survey performed for the same call. Surveys are to be initiated within 72 hours of the participant's contact with the call center. If the participant cannot be reached within three days of the initial contact, then the call will not be included in the survey. A total of seven questions are used to capture participant feedback about his/her most recent contact and interaction with the PSR and the call center.

Semi-annually, using feedback from the surveys and the QA scores, a Customer Satisfaction Report is issued. This report provides information regarding both the customer satisfaction

surveys and the QA scores as well as any correlation between participant scores and the corresponding foundation and finesse attribute scores. The Agency uses the report to track the level of satisfaction with the call center services. It also reviews the report to identify areas of opportunity for improvement in the two programs. It should be noted that the correlations between the two sets of scores are not definitive although they do provide a point of comparison between the perceptions of participants and those conducting the QA program.

When a PSR encounters a participant that requests escalation of his or her issue, the PSR attempts to diffuse the issue on his/her own or with the assistance of the helpdesk. If this does not resolve the issue, the PSR may offer a “call back” after the issue can be researched or, if necessary, a team lead or supervisor will take the call. Escalated calls are captured via PSR note and a log. Participant escalation calls are only forwarded to the Agency upon request. For compliment calls, supervisors make a permanent note to the PSR’s personnel file and may also use the opportunity to review the call for additional quality assurance or training purposes. Information about both complaint and complimentary calls are reported to the Agency monthly.

#### b. Service Delivery Processes

Service delivery processes include managing call center goals and participant expectations and providing proactive communication. A call center’s goals are typically created to support the mission and objectives of the sponsor organization. The TSP’s call centers’ operations reflect a commitment to achieve the contractual performance standards set by the Agency. Staffing, scheduling, and performance monitoring are all focused on the call center’s ability to appropriately achieve the contractual performance standards.

Participant expectations can be influenced by any type of interaction they have with the TSP (e.g., TSP web site, ThriftLine, or contact with a PSR). Accurate tracking and monitoring of the metrics that influence participant perceptions such as service level, hold time, and first contact resolution percentage, and in some cases sharing this information with participants, can increase the likelihood that the interaction will be positively received. The call centers’ PSRs attempt to resolve participant inquiries on the first call. If a call is not resolved on first contact, or if a participant requests escalation, a research request form is completed, a PSR call note is added to the system, and the information is provided to a research analyst (i.e., an experienced PSR). Research analysts attempt to resolve issues within 72 hours of receipt. Participants receive a call back within the 72-hour internal goal with an update to their issue. A PSR call note is added for each interaction with the participant.

Call handling processes typically consist of processes followed during calls to provide call handling for all potential scenarios that may occur. Examples of these processes include logging issues in a consistent manner for accuracy and completeness; escalating issues through the proper channels when a participant requests escalation or when a difficult inquiry can not be resolved; properly placing the participant on hold or transferring the call; setting the expectations for service delivery from the beginning of the call through the call's completion; handling TDD calls (as appropriate); finding resolutions from a knowledge management tool; and phone etiquette skills.

The TSP call handling processes are communicated through formal training. Prior to the PSR handling live calls, PSRs conduct "link-up" sessions with an experienced PSR listening in on the call and sitting next to the PSRs or observing the call within a controlled environment. This technique is used to improve call handling capabilities before the new PSRs take live calls on their own. Call handling processes are also available to PSRs in hard copy from their training courses, which can be kept in a station binder (i.e., a compilation of useful training materials that the PSR uses as reference material). In addition, as reported earlier, quality assurance monitoring and coaching provide PSRs with information on their performance related to program requirements, proper phone etiquette, and call handling techniques.

Providing information to participants about upcoming events or changes to the program prior to the event or change is an example of proactive communication. Being proactive allows the Agency to synchronize activities across the call centers in order to prepare in advance for known disruptions to service or program changes. The Agency has demonstrated proactive communication through ThriftLine information messages; TSP web site postings; example questions and answers (Q's and A's); and TSP Highlights. The TSP web site also provides Frequently Asked Questions (FAQ); forms and publications; and plan news, among other items. These communications can reduce the number of routine telephone calls that the call center receives. In addition, there is a weekly call among all of the TSP operational units to discuss, among other topics, issues that are impacting, or could impact, the volume of calls and repeat inquiries that the call center has experienced.

#### c. Performance Metrics

Performance metrics are used to manage, measure and monitor the effectiveness and efficiency of the call center in areas such as time to answer, time on hold, abandonment rate, first contact

resolution, and staff productivity. They can be used to initiate changes in service delivery and to optimize resource allocation.

The following section includes our understanding of the performance standards used to manage call handling performance, the call volume management techniques and volume trends used by the TSP call center program, and the benchmarking practices used by the Agency to compare performance in operations and call handling.

### *Performance Standards*

The performance standards are contractual requirements of the call centers. The current performance standards used to measure call centers' include the abandonment rate, adherence, average handle time, blocked calls, occupancy, and the telephone service factor (TSF).

The Agency monitors multiple reports throughout the year to discern the call centers' achievement of performance. In the event of an anomaly in performance, the Agency call center program manager and the call center manager(s) discuss the issue and determine the cause of the problem and a resolution. The Agency reviews the following reports, with the corresponding frequency:

#### Daily

- Daily Interval Report measuring performance standards in 30-minute intervals

#### Weekly

- Week to Date ThriftLine and PSR calls comparison of call centers

#### Monthly

- Monthly totals and comparisons of ThriftLine and PSR calls
- Each center's monthly performance summary of selected performance standards
- Monthly summary of ThriftLine and PSR calls
- Each center's staffing monthly report
- Research request report

#### Annually

- Performance standards call center comparison from January to December

Each center's management monitors performance standards more frequently. Supervisors and operations staff perform real-time monitoring of performance standards via the Symposium software display. Any disparity from the standards may lead supervisors and operations staff to review the staff schedule and call volume spikes, and may lead to a discussion with the Agency call center program manager concerning potential issues that have impacted performance (e.g., excessive sick leave, weather conditions, and queuing). The Agency call center program manager may consider changing call volume loads at the telecommunications provider switch level in an effort to improve the performance. Additionally, the centers may consider changing workforce variables through the workforce scheduling and forecasting software.

#### *Call Volume Management*

The Agency prefers to be proactive in disseminating call loads to each call center. The distribution of calls is controlled through the telecommunications provider. The Agency (and for emergency/business continuity purposes, each call center) has the ability to change the percent of program traffic for toll-free incoming calls for each call center via a web browser. For this purpose, the telecommunications provider supplies a dedicated web site that is accessible through a unique user ID and password.

#### *Industry Benchmarking*

The Agency contracted services from ICMI in 2004 to assess and recommend improvements in service delivery processes across the TSP call centers. ICMI, and more recently ServiceAgility, has provided a proprietary scheduling program, conducted ongoing center reviews, assisted in the development materials for the quality monitoring program and customer satisfaction survey, and recommended and assisted in the implementation of several operational improvements across both call centers.

Although the Agency does not attempt to benchmark, it has taken advantage of ICMI's call center certification program. This program examines all aspects of call center management, operations, processes, technology, and evaluation against best practices. The TSP Call Center Program (which encompasses the Agency as well as both call centers) received ICMI's first certification in May 2008. The certification is valid for two years. After that, the Agency must seek recertification.

Instead of benchmarking, the Agency performs a bi-annual analysis, with the assistance of Service Agility, Inc.<sup>9</sup>, to evaluate the customer satisfaction survey results across both call centers. Additional correlations are made between the satisfaction survey responses and the quality monitor forms used to evaluate the corresponding calls. This information is used to refine the survey questions or administration, and also to refine the methods by which calls are being monitored. This also allows the Agency to gauge the level of transparency that participants are experiencing by comparing the results of the call centers to one another.

#### d. Training and Professional Development Programs

In addition to orientation sessions provided to all company employees, all PSRs are subject to a 4-5 week comprehensive training program prior to taking live phone calls. The course consists of TSP program specific course work consisting of the following areas: eligibility and contributions, investments, spousal rights, loans, in-service withdrawals, post-service withdrawals, annuities, transfers/rollovers, court orders, death benefits, beneficiaries, and account access; supplemental training, including customer service standards and techniques and application training; "link up" sessions; and sessions using the TSP Web site, PSR and PowerImage software. A final exam is administered which focuses on all program-specific areas and the TSP system. In order to pass the exam, PSRs must obtain a score of 90% or better.

Extensive ongoing training programs exist at both centers. In addition to quarterly refresher training and ad hoc sessions, the Agency also provides annual Privacy Act training and sessions on topics of relevance (e.g., investments and required minimum distributions). In addition, the other operational units (Legal Processing Unit, Death Benefits Processing Unit, and Mail Management/Data Entry) provide training for the PSRs in their specialty areas. Annual security training is provided via Agency-sponsored Computer Based Training (CBT) sessions.

Professional development for PSRs occurs through the quality monitoring process and the review processes. PSRs that exhibit skills above the job requirements might be considered for advancement to team lead or the help desk. The criteria for selection to a team lead or the help desk includes above average quality monitoring scores; satisfactory agent detail productivity; extensive knowledge of the program; adherence to established call center procedures; and participation in the link-up (i.e., mentoring) program.

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<sup>9</sup> Service Agility focuses on improving performance and satisfaction in customer service and sales operations. It serves call centers and those providing service in face-to-face environments.

### e. Technology Support

The PSR's ability to serve participants is directly related to the performance of the information system. Performance is defined in terms of a system that provides PSRs with accurate and timely information that is readily available.

All PSR workstations are required to be equipped with a standard configuration that includes:

- X86 platform
- Equal to or greater than 2.0 GigaHertz (GHz) Intel or Advance Micro Devices (AMD) processor
- Windows XP Operating System
- Equal to or greater than 60 GB hard disk
- 1 GB memory
- Video adapter with equal to or greater than 128 MegaBytes (MB) of video memory

Additional software used to support participants includes the Verint software for workforce management; Nortel software for call routing, reporting, and statistics; Versadial for recording all calls; Click2Coach for recording PSR phone calls and screen shots of the PSR's call interaction; PSR for case management; PowerImage for storing forms; and the Talisma KnowledgeBase for researching content for participant inquiries.

The core applications used by the PSR include the PSR application, PowerImage, and the Talisma KnowledgeBase. The PSR application is the customer account history and inquiry logging software used to provide participants with information related to their accounts (such as account balance, loan, contribution, and withdrawal information). The PowerImage application is used by PSRs for functions including identification of work-in-process loan and withdrawal requests, research, and transmittal of fax-back materials to participants at their request. The Talisma KnowledgeBase, which is used by the Agency and both call centers, provides the ability to keyword search a database of common inquiries and resolutions. In addition, the tool contains a bulletin board feature that contains links to common questions and answers or upcoming events and program changes. Maintenance of the knowledge database is a collaborative effort by the Agency and the call centers.

The core applications used by supervisors include the Symposium workbench, Verint, and Click2Coach. The Symposium software is used to monitor the achievement of performance standards in real-time and provide historical reporting. The Symposium real-time display

provides service level achievement as it occurs, providing the supervisor with information such as calls on hold, calls abandoned, and TSF (i.e., the percentage of calls answered with a given time period (e.g., 90% within 20 seconds).

The Verint software is used to forecast workforce requirements corresponding to pre-established service levels. It also provides the schedule required to fulfill the work forecast in order to meet the demand of the service level variables. Each week, a dedicated workforce manager creates a work schedule based on the following service levels:

**Service level = 90% of calls answered in 20 seconds**

**Maximum abandons = 2%**

**Average Talk Time = 270 seconds/call**

**Average wrap-up time = 120 seconds/call**

**Shrinkage (absenteeism and other) = 10%**

The software uses these figures to create a weekly work schedule for the designated hours of operation, the number of seats (i.e., PSRs) needed to achieve the service level goals, and the times scheduled for on the phone activity, breaks, and lunches. Any changes to the schedule must be communicated to the workforce manager to recast the schedule.

The Click2Coach software is used for the quality monitoring process as described in the Customer Feedback Section. Every third call and screenshot are recorded and stored on disk on the Click2Coach server. The Click2Coach server is incrementally backed up daily and is backed up in its entirety on a weekly basis to tape. A complete copy of the server is stored offsite weekly. All evaluated calls (calls that have been reviewed and graded by the QA staff) are retained on the server, and calls that are greater than 45 days old and have not been reviewed are removed from the server.

### **III. FINDINGS AND RECOMMENDATIONS**

#### **A. Introduction**

We performed procedures related to the Thrift Savings Plan (TSP) participant support process while conducting a performance audit at the Federal Retirement Thrift Investment Board's Staff (Agency) headquarters and the two TSP call centers. This performance audit consisted of reviewing applicable policies and procedures and testing manual and automated processes and controls, which included interviewing key personnel (Appendix A), reviewing key reports and documentation (Appendix B), and observing selected procedures. Exhibit III-1 summarizes each recommendation. We discussed these recommendations with the appropriate Agency representatives (Appendix C). The Agency's comments are included as an appendix within this report (Appendix D).

We also reviewed certain prior TSP recommendations, identified below, to determine their current status. One prior year recommendation was reported in the "Post Implementation Review of the New Thrift Savings Plan Recordkeeping System, December 12, 2003," and the other three prior year recommendations were reported in the "Review of the Thrift Savings Plan Call Center at SI International<sup>10</sup>, September 30, 2006." Section III.B documents the status of these prior recommendations. In summary, two recommendations have been implemented and closed, and two recommendations have been partially implemented but have been closed and incorporated into current year recommendations.

We present nine new recommendations related to the TSP's participant support process, seven addressing fundamental controls and two addressing other controls. Fundamental control recommendations address significant procedures or processes that have been designed and operate to reduce the risk that material intentional or unintentional processing errors could occur without timely detection or that assets are inadequately safeguarded against loss. Other control recommendations address procedures or processes that are less significant than fundamental controls. All recommendations are intended to strengthen the TSP's participant support process. The Agency should review and consider these recommendations for timely implementation.

Section III.C presents the findings and recommendations from this performance audit. Exhibit III-1 (next page) summarizes each recommendation.

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<sup>10</sup> SI International was purchased by Serco Inc. during calendar year 2008.

**SUMMARY OF RECOMMENDATIONS****FUNDAMENTAL CONTROL RECOMMENDATIONS**

1. To strengthen logical access controls at the Maryland call center, we recommend that the Agency:
  - a. Implement a vulnerability management program that identifies and implements corrective action plan requirements for the call center.
  - b. Monitor the implementation of corrective actions to address the high risk vulnerabilities identified at the call center.
  - c. As necessary, assess and update existing contractual arrangements with the call center contractor to include all necessary compliance requirements for information and technical security.
  - d. Remove LAN access for those individuals identified as separated or transferred, and enforce the requirements for removing separated and transferred employees' access timely.
  - e. Disable USB ports as required by the TSP security program on all required call center workstations.
  
2. To strengthen logical access controls at the Virginia call center, we recommend that the Agency:
  - a. Monitor the implementation of corrective actions to address the high risk vulnerabilities identified at the call center.
  - b. As necessary, assess and update existing contractual arrangements with the call center contractor to include all necessary compliance requirements for information and technical security.
  - c. Remove LAN access for those individuals identified as separated or transferred, and enforce the requirements for removing separated and transferred employees' access timely.
  - d. Disable USB ports as required by the TSP security program on all required call center workstations.

## SUMMARY OF RECOMMENDATIONS, CONTINUED

3. To address technology weaknesses at the Maryland call center, we recommend that the Agency:
  - a. Monitor the call center's plan to proceed with setting up an alternate storage site for Versadial backup media and to identify, select, and implement a method to encrypt the backups when stored off-site.
  - b. Evaluate and implement compensating controls over the minimum password length setting weakness of Versadial, or document the acceptance of this risk in appropriate security documentation (i.e., TSP System Security Plan).
  - c. For Internet browser settings at the call center, monitor to ensure that the auto-complete setting is "disabled" to prevent storing of usernames and passwords of the HelpLine system.
  - d. Monitor the call center's plan to proceed with upgrading the Windows NT environment to the Active Directory network.
4. To address technology weaknesses at the Virginia call center, we recommend that the Agency:
  - a. Identify, select, and implement a method to encrypt Versadial hard drive discs stored off-site and build redundant capabilities for Versadial servers at the call center. In addition, the Agency should ensure that unique user IDs and passwords for individuals performing administrative duties over Versadial are established.
  - b. Evaluate and implement compensating controls over the minimum password length setting weakness of Versadial, or document the acceptance of this risk in appropriate security documentation (i.e., TSP System Security Plan).
5. To strengthen physical access controls at the Maryland call center, we recommend that the Agency monitor implementation of any corrective actions at the call center that result from the evaluation of the physical access controls to prevent individuals from having more access than they need to perform their job functions.

**SUMMARY OF RECOMMENDATIONS, CONTINUED**

6. To strengthen physical access controls at the Virginia call center, we recommend that the Agency:
  - a. Monitor implementation of any corrective actions taken at the call center to improve physical security controls of the door to the supply room and external surveillance systems, and ensure that the selected option restricts access to the controlled areas as necessary and in accordance with the contract requirements for protecting sensitive equipment and participant information.
  - b. Monitor implementation of any corrective actions taken at the call center to improve physical security controls for programming or replacing the A-cast badge access software system. The badge access system should contain the capability to separate general work areas from sensitive work areas at the individual access level.
7. The Agency should enforce the call center requirements for maintaining adequate evidence of privacy training.

**OTHER CONTROL RECOMMENDATIONS**

8. The Agency should re-evaluate the contractual provisions that require the contractor to respond to 90% of written inquiries within five business days to ensure the provision is reasonable, the response time is acceptable to maintain participant satisfaction, and any allowable exceptions to the requirement are clearly identified so that they may be tracked. The Agency should then monitor the contractor to ensure that the contractual provisions are being met.
9. The Agency should enhance its monitoring procedures over Congressional inquiries to ensure that inquiries are responded to in a timely manner.

## B. Findings and Recommendations from Prior Reports

Findings and recommendations from prior reports that required follow-up are presented in this section. The discussion below includes the current status of each recommendation through August 14, 2009.

### **2004 Post-Implementation Review of the TSP System Recommendation No. 1:**

Original Recommendation: To ensure transactions are complete, accurate, and processed timely, the Board should consider refining its quality assurance activities. These activities should include:

- Reviewing a sample of PowerImage and OmniPlus reject notices prior to mailing, to determine that the rejections are proper and that the reasons provided in the notices are valid;
- Reviewing a sample of successfully processed forms to verify completeness and accuracy of data entry;
- Re-evaluating the quality assurance activities after six months to refine the nature, timing, and extent of these procedures as deemed necessary; and
- Developing performance goals for timely processing of TSP forms within PowerImage, as well as a way to measure compliance with the goals, e.g., generate and review an aging report of all forms waiting to be processed to measure processing timeliness.

Reason for Recommendation: During our testing of the loan and withdrawal processes, we noted that a TSP-20, *Loan Application*, was rejected by OmniPlus due to insufficient funds in the participant's account. However, the reason provided in the reject notice was that the amount the participant requested was less than the required minimum loan amount of \$1,000. The reject notice description error was due to a programmatic error in OmniPlus, which was corrected upon notification.

August 2009 Status: **Not Implemented.**

Reject notices are generated by the TSP system through an automated process. While no manual review of the system-generated notices occurs, the programming used to generate the notices, including any updates, are

tested both prior to implementation and after implementation. During our current year audit, we selected a sample of 58 reject notices for testing and noted they had all been appropriately generated.

Although the recommendations above were not implemented, the aforementioned procedures address the previous issues identified related to reject notices. Therefore, we consider this recommendation closed.

Disposition:            **Recommendation Closed.**

**2006 TSP Call Center at SI International Recommendation No.1:**

Original                    The Agency should ensure that logical access controls are strengthened.

Recommendation:      Specifically, the Agency should ensure that:

- Media protection, sanitization, and disposal procedures for hardware media containing sensitive TSP data are completed, promulgated, and enforced.
- Cost-effective options for disabling USB ports on all workstations without disrupting productivity of personnel or call center service levels are evaluated.
- OmniSecurity password length setting is changed to conform to the TSP policy.

Reason for                    The Agency has created and promulgated the TSP System Security plan  
Recommendation:      documentation and TSP Data Security Standard to establish management, technical, and operational controls over the TSP recordkeeping system (TSP system). TSP participant records, while not stored on hardware at the call center, may contain personally identifiable information as part of routine, daily operations. Thus, while the call center has implemented many of the TSP security practices, certain improvements can be made.

August 2009                **Partially Implemented.**

Status:                      With regard to the media protection, sanitization, and disposal procedures for hardware media containing sensitive TSP data, we confirmed that the media protection policy has been finalized and promulgated by the

Agency. We also observed a degaussing unit at the call center to help enforce the requirements of the policy.

With regard to the USB ports being disabled on all workstations, we learned that while the USB ports of Participant Support Representative workstations have been disabled, the USB ports on public access internet computers (i.e., 6 workstations), the call center manager's workstation, and the administrative assistant's work station were not disabled at the call center.

With regard to the OmniSecurity password length settings, password settings have not changed.

Disposition:

**Recommendation Closed.** We have incorporated the remaining open recommendations into the current year recommendations in subsection III.C of this report. See current year recommendations no. 2009-1 and 2009-2 related to logical access controls and recommendations no. 2009-3 and 2009-4 related to call center technology weaknesses.

**2006 TSP Call Center at SI International Recommendation No. 2:**

Original

Recommendation:

The Agency should ensure physical controls at the call center are strengthened. Specifically, the Agency should:

- Evaluate options for programming or replacing the A-cast badge access software system. The badge access system should contain the capability to separate general work areas from sensitive work areas at the individual access level.
- Repair the exterior and interior unlocked doors and ensure that the selected option restricts access to the controlled areas as necessary and in accordance with the contract requirements for protecting sensitive equipment and participant information.

Reason for

Recommendation:

The Agency conducted an evaluation of the physical and environmental controls over the call center in order to gain comfort with the selection of the call center's operation location. The call center's remote location

reduces the exposure to external, physical threats that a call center in a busier, commercial location might encounter. However, we noted several physical access controls points that should be strengthened.

August 2009 Status: **Partially Implemented.**

With regards to the A-cast badge access software system, the Agency communicated that the system has been upgraded but it still does not allow general work area access to be segregated from sensitive work areas.

With regard to the two exterior doors and one interior door identified during our 2006 test procedures, those doors have been fixed.

Disposition: **Recommendation Closed.** We have incorporated the remaining open recommendation into the current year recommendations in subsection III.C of this report. See current year recommendations no. 2009-5 and 2009-6 related to call center physical access weaknesses.

**2006 TSP Call Center at SI International Recommendation No. 3:**

Original Recommendation: The Agency should closely monitor all call center handling processes, including participant research requests, in order to ensure required customer service levels consistent with documented internal goals.

Reason for Recommendation: The research request process is designed to perform research for participants with difficult inquiries. All participants are required to receive a call back related to their research request within 48 hours. During our testing of the call handling and call center processes, we noted that for one of the seven haphazardly selected research requests, the participant did not receive a call back within this required timeframe.

August 2009 Status: **Implemented.** During our current year test procedures, we did not identify any exceptions in the sample of 45 research requests we evaluated.

Disposition:

**Recommendation Closed.**

### **C. 2009 Findings and Recommendations**

While conducting our performance audit over the TSP participant support process, we identified six findings and developed related recommendations. The Employee Benefits Security Administration (EBSA) requests appropriate and timely action for each recommendation.

#### **RECOMMENDATIONS TO ADDRESS FUNDAMENTAL CONTROLS**

##### **Logical Access Controls at the Call Centers Should Be Strengthened**

We identified several weaknesses at both call centers during our current year test procedures over logical access controls. Control weaknesses in this area include the processes for removing access for separated or transferred individuals, disabling Universal Serial Bus (USB) ports, and technical security safeguards over the technical infrastructure. Specifically, we identified the following weaknesses at the Maryland call center:

- A comprehensive vulnerability management program that monitors and patches technical security weaknesses is not in place over the technical infrastructure that supports the call center. During our review of the Agency's results of its internal scanning activities over the call center, we noted several high risk vulnerabilities were identified but for which no corrective action plans had been developed and implemented. In addition, we identified several additional vulnerabilities based on our external vulnerability scanning procedures over the call center.
- 2 of 22 separated individuals tested had an active account on the call center's Local Area Network (LAN) after separation.
- USB ports and disk drives have not yet been disabled at the call center.

In addition, we identified the following weaknesses at the Virginia call center:

- One vulnerability was identified during our external vulnerability scanning procedures at the call center.
- 1 of 16 separated individuals tested had an active account on the call center's LAN after separation.
- While most USB ports were disabled at the call center, USB ports on public access internet computers (i.e., 6 workstations), the call center manager's workstation, and the administrative assistant's work station were not disabled.

The TSP call centers currently operate under different contractual arrangements. The Virginia call center is a Government Owned Contractor Operated (GOCO) facility and the Maryland call center is a Contractor Owned Contractor Operated (COCO) facility. With regard to the technical vulnerabilities identified, the Agency lacks the contractual requirements with the Maryland call center to enforce minimum information and technical security requirements. Regarding the logical access being retained by separated or transferred individuals, the process for removing or altering access was not consistently followed at both call centers. With regard to the USB ports, the Utimaco Safeguard Enterprise (Utimaco) software<sup>11</sup> at the Maryland call center has not been installed because the center continues to run Windows NT, which is no longer supported by Microsoft and is not compatible with the software. At the Virginia call center, contractors did not complete the installation of the Utimaco software on the workstations identified.

National Institute of Standards and Technology (NIST) *Special Publication (SP) 800-53 rev. 2*, states, "The organization scans for vulnerabilities in the information system [Assignment: organization-defined frequency] or when significant new vulnerabilities potentially affecting the system are identified and reported." It further states, "The organization employs vulnerability scanning procedures that can demonstrate the breadth and depth of scan coverage, including vulnerabilities checked and information system components scanned."

NIST *SP 800-53* also states, "The organization manages information system accounts, including establishing, activating, modifying, reviewing, disabling, and removing accounts. The organization reviews information system accounts [Assignment: organization-defined frequency, at least annually]."

NIST *SP 800-53* states, "The organization: (i) establishes mandatory configuration settings for information technology products employed within the information system; (ii) configures the security settings of information technology products to the most restrictive mode consistent with operational requirements; (iii) documents the configuration settings; and (iv) enforces the configuration settings in all components of the information system." It further states that, "The organization configures the information system to provide only essential capabilities and specifically prohibits and/or restricts the use of the following functions, ports, protocols, and/or services: [Assignment: organization-defined list of prohibited and/or restricted functions, ports, protocols, and/or services]."

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<sup>11</sup> The Utimaco software provides data protection against unauthorized access, loss or theft of stationary and mobile devices with full disk encryption.

- 1. To strengthen logical access controls at the Maryland call center, we recommend that the Agency:**
  - a. Implement a vulnerability management program that identifies and implements corrective action plan requirements for the call center.**
  - b. Monitor the implementation of corrective actions to address the high risk vulnerabilities identified at the call center.**
  - c. As necessary, assess and update existing contractual arrangements with the call center contractor to include all necessary compliance requirements for information and technical security.**
  - d. Remove LAN access for those individuals identified as separated or transferred, and enforce the requirements for removing separated and transferred employees' access timely.**
  - e. Disable USB ports as required by the TSP security program on all required call center workstations.**
  
- 2. To strengthen logical access controls at the Virginia call center, we recommend that the Agency:**
  - a. Monitor the implementation of corrective actions to address the vulnerability identified at the call center.**
  - b. As necessary, assess and update existing contractual arrangements with the call center contractor to include all necessary compliance requirements for information and technical security.**
  - c. Remove LAN access for those individuals identified as separated or transferred, and enforce the requirements for removing separated and transferred employees' access timely.**
  - d. Disable USB ports as required by the TSP security program on all required call center workstations.**

If the call centers do not establish and enforce minimum security requirements to improve the security posture of information systems supporting the TSP program, they will operate at a level of risk that is inconsistent with TSP security program requirements for patching technical vulnerabilities, exposing the technology to unnecessary vulnerabilities and potential exploits. If identified vulnerabilities are not corrected, the call center infrastructure will be operating at a higher level of risk than that accepted by the TSP security program for TSP systems. If access to the LAN is not removed for separated or transferred individuals, the risk of unauthorized disclosure, modification or destruction of TSP data and systems remains. If USB ports are not

disabled, the risk remains that information can be downloaded or malicious programs can be uploaded.

### **Call Center Technology Weaknesses Should Be Addressed**

Several control weaknesses were identified at both call centers during our test procedures over the Versadial system, which records all incoming and outgoing phone calls made at the call centers. In addition, we identified specific weaknesses related to the Maryland call center custom tool used to log help line calls and the infrastructure being used to support the technology. Specifically, we identified the following weaknesses at the Maryland call center:

- The call center's Versadial backups do not have an alternate storage site, and the password character length settings for Versadial are inconsistent with Agency requirements.
- The call center HelpLine system, a custom application, contains personally identifiable information (PII) (e.g., social security numbers) and stores the username and password of the user.
- The call center infrastructure continues to use Windows NT, which is no longer supported by Microsoft.

In addition, we identified the following weaknesses at the Virginia call center:

- The call center's Versadial removable hard drive discs used to record audio calls are not encrypted when stored off-site; the Versadial application login and password for the Versadial recorder are being shared by individuals performing administrative duties; and the password character length settings for Versadial are inconsistent with Agency requirements.
- The call center's Versadial servers record phone calls on individual hard drives without redundant capabilities. In the event of hard drive failure, the Versadial server connected to the hard drive would stop recording phone calls, resulting in a single point of failure for that Versadial server recording calls.

With regards to the Maryland call center, an alternate storage site has not been established for housing Versadial backup media; and the Versadial software is a commercial off the shelf (COTS) product with inherent limitations to conform to password setting requirements. Additionally, the auto-complete feature has been turned on in the HelpLine system to store the user name and password. Finally, the center has not completed the migration of its systems from the Windows NT environment to Active Directory, which is supported by Microsoft.

With regard to Virginia call center, procedures call for Versadial backups to be recorded in .wav format onto removable hard drives. Although the backups contain recordings of participant phone calls that also contain PII, the Agency currently does not have a process in place to encrypt the center's backups when stored offsite. As noted above, Versadial software is a COTS product with inherent limitations to conform to password setting requirements, and unique user IDs and passwords for individuals monitoring the recording of phone calls is not being enforced.

NIST *SP 800-53 rev.2* states, "The organization identifies an alternate storage site and initiates necessary agreements to permit the storage of information system backup information."

Office of Management and Budget (OMB) *Memorandum M-06-16, Protection of Sensitive Agency Information*, states that agencies should, "Implement protections for personally identifiable information being transported and/or stored offsite." It further states, "In those instances where personally identifiable information is transported to a remote site, implement NIST Special Publication 800-53 security controls ensuring that information is transported only in encrypted form."

NIST *SP 800-53, rev. 2 p. F-36* states, "Information system authenticators include, for example, tokens, PKI certificates, biometrics, passwords, and key cards. Users take reasonable measures to safeguard authenticators including maintaining possession of their individual authenticators, not loaning or sharing authenticators with others, and reporting lost or compromised authenticators immediately."

The *TSP System Security Plan* establishes password complexity and composition rules that include, "...prohibiting the use of group, shared, or generic accounts/passwords, requiring a minimum password length of at least eight characters, using passwords that are both numeric and alphabetic characters."

NIST *SP 800-34, Contingency Planning Guide for Information Technology Systems*, p. 58, states, "When developing the contingency plan, the Contingency Planning Coordinator should identify single points of failure that affect critical systems or processes outlined in the Business Impact Analysis (BIA)."

According to OMB *Memorandum M-08-22, Guidance on the Federal Desktop Core Configuration (FDCC)*, the Federal Desktop Core Configuration (FDCC) includes guidance on establishing settings for Windows desktops and related software such as web browsers (i.e.,

Internet Explorer). FDCC checklists contain recommendations to disable the auto-complete feature for user names and passwords on forms.

NIST *SP 800-53 rev.2* states, "The organization identifies information systems containing software affected by recently announced software flaws (and potential vulnerabilities resulting from those flaws). The organization promptly installs newly released security relevant patches, service packs, and hot fixes, and tests patches, service packs, and hot fixes for effectiveness and potential side effects on the organization's information systems before installation."

- 3. To address technology weaknesses at the Maryland call center, we recommend that the Agency:**
  - a. Monitor the call center's plan to proceed with setting up an alternate storage site for Versadial backup media and to identify, select, and implement a method to encrypt the backups when stored off-site.**
  - b. Evaluate and implement compensating controls over the minimum password length setting weakness of Versadial, or document the acceptance of this risk in appropriate security documentation (i.e., TSP System Security Plan).**
  - c. For Internet browser settings at the call center, monitor to ensure that the auto-complete setting is "disabled" to prevent storing of usernames and passwords of the HelpLine system.**
  - d. Monitor the call center's plan to proceed with upgrading the Windows NT environment to the Active Directory network.**
  
- 4. To address technology weaknesses at the Virginia call center, we recommend that the Agency:**
  - a. Identify, select, and implement a method to encrypt Versadial hard drive discs stored off-site and build redundant capabilities for Versadial servers at the call center. In addition, the Agency should ensure that unique user IDs and passwords for individuals performing administrative duties over Versadial are established.**
  - b. Evaluate and implement compensating controls over the minimum password length setting weakness of Versadial, or document the acceptance of this risk in appropriate security documentation (i.e., TSP System Security Plan).**

Call center technology is a critical component in supporting participants, and protecting participant information is an integral part of providing this support. With a heavy reliance on

technology to support and protect participant information, weaknesses in the infrastructure and applications increase the risks associated with unauthorized disclosure of information.

### **Call Center Physical Access Controls Need to Be Strengthened**

Several control weaknesses were identified at both call centers during our current year test procedures over physical access. Specifically, we identified the following weakness at the Maryland call center:

- Access to the TSP dedicated areas within the call center was not always granted based on least privilege. We identified a total of 15 Field Site Support (FSS) staff members who did not have a valid need to access the TSP dedicated areas and subsequently had their physical access permissions revoked.

In addition, we identified the following weaknesses at the Virginia call center:

- One door at the call center that leads to the power supply to the building did not have adequate protection to deter forcible entry and was not alarmed. In addition, the exterior of the building was not monitored through surveillance cameras.
- The proximity card reader system at the call center provides users' with total access rather than restricting users' access to specific rooms. Therefore, individuals can be granted access to sensitive areas that may not be necessary to fulfill their job responsibilities.

With regard to the Maryland call center, access permissions were not reevaluated as required to verify the appropriateness of certain access. At the Virginia call center, options for improving the exterior physical security controls have not been evaluated. In addition, the proximity card reader system does not have the functionality to restrict users' access to specific rooms.

NIST *SP 800-53* p. F-50, states that, "the organization promptly removes from the access list personnel no longer requiring access to the facility where the information system resides." According to p. F-60, "The organization reviews information systems/facilities access authorizations when personnel are reassigned or transferred to other positions within the organization and initiates appropriate actions." In addition, p. F-3 states, "The organization manages information system accounts, including establishing, activating, modifying, reviewing, disabling, and removing accounts. The organization reviews information system accounts."

NIST *SP 800-53* p.F-51 states that, "the organization controls all physical access points (including designated entry/exit points) to the facility where the information system resides

(except for those areas within the facility officially designated as publicly accessible) and verifies individual access authorizations before granting access to the facility. The organization controls access to areas officially designated as publicly accessible, as appropriate, in accordance with the organization's assessment of risk. The organization develops and keeps current a list of personnel with authorized access to the facility where the information system resides (except for those areas within the facility officially designated as publicly accessible) and issues appropriate authorization credentials." It further states, "The organization monitors physical access to the information system to detect and respond to physical security incidents and reviews physical access logs."

5. **To strengthen physical access controls at the Maryland call center, we recommend that the Agency monitor implementation of any corrective actions at the call center that result from the evaluation of the physical access controls to prevent individuals from having more access than they need to perform their job functions.**
6. **To strengthen physical access controls at the Virginia call center, we recommend that the Agency:**
  - a. **Monitor implementation of any corrective actions taken at the call center to improve physical security controls of the door to the supply room and external surveillance systems, and ensure that the selected option restricts access to the controlled areas as necessary and in accordance with the contract requirements for protecting sensitive equipment and participant information.**
  - b. **Monitor implementation of any corrective actions taken at the call center to improve physical security controls for programming or replacing the A-cast badge access software system. The badge access system should contain the capability to separate general work areas from sensitive work areas at the individual access level.**

Without adequate physical access controls, TSP participant information is potentially exposed to risks related to unauthorized disclosure, modification or destruction of TSP data and resources.

### **Information Privacy Requirements Should Be Enforced at the Call Centers**

We identified weaknesses in the enforcement of certain training and contract on-boarding requirements at both call centers. Specifically, we noted the following as the Maryland call center:

- Evidence was not retained to show that 13 call center employees completed the Privacy Act Training.

In addition, we noted that sign-in logs were not maintained for the Virginia call center's Privacy Act Training. Therefore, we were unable to verify whether the training was provided to all call center employees.

The Agency did not require evidence of training completion for privacy related training to be retained.

NIST *SP 800-53* states, "The organization documents and monitors individual information system security training activities including basic security awareness training and specific information system security training. The organization completes appropriate signed access agreements for individuals requiring access to organizational information and information systems before authorizing access and reviews/updates the agreements."

**7. The Agency should enforce the call center requirements for maintaining adequate evidence of privacy training.**

Individuals may not be fully aware of their specific information security and privacy responsibilities, which puts TSP systems and participant information at risk of misuse, disclosure, modification or destruction.

## **OTHER CONTROL RECOMMENDATIONS**

### **Participant Written Inquiries Process Should Be Strengthened**

During our audit, we randomly selected a sample of 58 written inquiries. For 12 of the written inquiries selected, we noted that a response was not provided within five business days. This represented 20.6% of our total sample size.

The Agency attributed some of the delays to high call volumes. When call volumes are high, the call center management reassigns agents working on written correspondence to answer phone calls. In addition, the Agency is not strictly enforcing the contractual timeframe requirements.

The Agency's contract with the Virginia call center, which is responsible for written inquiries, states that "90% of all written inquiries must be answered within 5 business days of receipt. If the inquiry cannot be answered by the TSPD or if it requires action by TIB, the inquiry must be sent to TIB within 5 business days of receipt."

- 8. The Agency should re-evaluate the contractual provisions that require the contractor to respond to 90% of written inquiries within five business days to ensure the provision is reasonable, the response time is acceptable to maintain participant satisfaction, and any allowable exceptions to the requirement are clearly identified so that they may be tracked. The Agency should then monitor the contractor to ensure that the contractual provisions are being met.**

Participant satisfaction will be maintained by ensuring that written inquiries are addressed in a timely manner.

### **Congressional Inquiries Process Should Be Strengthened**

We selected a sample of 58 Congressional inquiries for testing. For 3 of the 58 items selected, we noted that a response was not provided by the Agency within 30 days. The Agency stated that 2 of the 3 inquiries were delayed because of the complexity of the case. The third inquiry was late due to two employees in the Office of External Affairs being on leave, and because of other competing priorities, the work could not be reassigned.

The Agency's internal time frame for responding to Congressional inquiries is 30 days.

- 9. The Agency should enhance its monitoring procedures over Congressional inquiries to ensure that inquiries are responded to in a timely manner.**

Participant satisfaction will be maintained by ensuring that written Congressional inquiries are addressed in a timely manner.

**KEY PERSONNEL INTERVIEWED**

While performing fieldwork, we interviewed the following key personnel regarding the participant support process:

A. Federal Retirement Thrift Investment Board Staff

|                   |  |
|-------------------|--|
| Penny Moran       | Director, Office of Participant Services                                     |
| Anne Beemer       | Controller, Office of Finance  |
| Bonnie Parazinski | Call Center Manager  |
| Roy Friend        | Deputy Chief Information Officer, Software and Applications Management       |
| Troy Poppe        | Information Security Program Manager   |
| Sophie Dmuchoski  | Manager, Office of Communication   |
| Mark Allen        | IT Specialist and Board Continuity of Operations Planning (COOP) Coordinator |

B. Virginia Call Center

|                |   |
|----------------|---|
| Ezra Powers    | Call Center Manager                                 |
| Andy Miranda   | Operations Manager                                  |
| Linda Dean     | Written Correspondence Supervisor                   |
| Hollie Sargent | Quality Assurance Representative                    |
| Amber England  | Trainer   |
| George Ison    | Network Operations Manager and Administrator        |
| Sonja Smith    | Participant Service Representative (PSR) Supervisor |

C. Maryland Call Center

|                        |                       |
|------------------------|-----------------------|
| Robin Conner           | Program Manager       |
| Bob Reynolds           | IT Operations Manager |
| Jessica Swick          | Recruiter             |
| Christine Steinbrunner | Research Coordinator  |
| Adam Lubutka           | QA Specialist         |

KEY PERSONNEL INTERVIEWED, Continued

C. Maryland Call Center (continued)

|                |                           |
|----------------|---------------------------|
| Kevin Kenney   | Trainer                   |
| Linda Hartman  | Supervisor                |
| Shaun Evans    | Report Analyst            |
| Dawn Van Meter | Assistant Project Manager |

**KEY DOCUMENTATION AND REPORTS REVIEWED****Federal Retirement Thrift Investment Board Documents and Reports:**

- Quarterly TSP Meeting Agenda's dated June, September and December 2008 and March 2009
- Written Inquiry Quality Control Reports for the months of March and October 2008 and January 2009
- Contract between the Agency and the Virginia Call Center contractor
- Report of all Congressional Inquiries for the time period January 1, 2008 to March 31, 2009
- Agency's Correspondence Processing Procedures, dated August 1, 2007
- Written Correspondence Team Procedures Document Version 0.3, dated March 11, 2009
- Summary of Thrift Savings Plan, dated October 2008
- TSP In Service Withdrawals, dated July 2008
- TSP Payroll and Personnel Agency Representative meetings, dated June 18, 2008, September 10, 2008, December 17, 2008, and March 11, 2009
- Report no TSP 6011 – Inquiries for Virginia Call Center, Spherix, dated December 31, 2008
- Report no TSP 6009 entitled "Master Participant Notices Generated Summary Report" for a sample of 58 dates between January 1, 2008 and March 31, 2009
- Report No. TSP 6017 entitled "Participating Employees by Department," dated March 31, 2009
- Test Case Management User Guide
- TSP calculator on the TSP website
- Annuity calculator on the TSP website
- Elective Deferral calculator on the TSP website
- Loan calculator on the TSP
- ICMI Customer Satisfaction Survey Results, dated December 15, 2008
- Request for Proposal and Statement of Work for most recent solicitation
- Thrift Investment Board Overflow Call Center Technical Architecture, dated July 30, 2009
- BellSouth Configuration and Operations Presentation
- BellSouth Call Routing Slides
- New Procedure for Verification, dated March 16, 2009
- "What's New" Page from the TSP Website
- E-mail Subscription Page from the TSP Website

**KEY DOCUMENTATION AND REPORTS REVIEWED, CONTINUED**

- TSP Outage Notification, dated June 18, 2009
- Fall 2008 Privacy Act Training
- Security Awareness Training Tracking Spreadsheet

**Virginia Call Center Documents and Reports:**

- Customer Satisfaction and Quality Monitoring Results
- Escalated Call Spreadsheet for calls October 1, 2008-April 6, 2009
- Escalated Call and Research Request Test Results
- Communication examples to participants
- Standard Operating Procedures Manual, dated April 7, 2009
- Telecommunications device for the deaf (TDD) Call Procedures, dated April 20, 2008
- Information Security Policies and Procedures, v1.0, dated July 11, 2008
- TSP Training Manual
- Training List for employees hired on August 18, 2008, September 8, 2008, and February 23, 2009
- List of technology tools used
- Call Routing Slides
- Participant Support Manual, revised March 3, 2009
- Call Center Procedures for Adjusting Call Distributions
- Log of Call Distribution Changes
- Privacy Act Chart, dated August 23, 2008
- Master Key List
- Active Employee Listing
- New Hire E-mails, dated May 18, 2009
- Proximity Card Reader Listing
- Terminated Employee Listing for employees terminated since October 1, 2008
- LAN Access Listing, dated April 17, 2009
- Proxy Server Settings
- Interim Guidance for Media Handling and Disposal
- Wachovia Safety Deposit Box Agreement, dated December 22, 2008

**Maryland Call Center Documents and Reports:**

- Quality Assurance Monitoring Form and Guidelines Procedures, dated July 30, 2009
- Customer Service Survey Procedures, dated July 30, 2009

**KEY DOCUMENTATION AND REPORTS REVIEWED, CONTINUED**

- Customer Satisfaction and Quality Monitoring Results
- Tier II Procedures, dated April 15, 2009
- Escalated Call and Research Request Test Results
- Training Procedures, dated January 14, 2009
- Training List, dated February 11, 2009
- List of technology tools used, dated April 20, 2009
- Maryland Call Center Security Procedures, dated April 6, 2009
- List of Employees authorized to work on the Federal Retirement Thrift Investment Board (FRTIB) contract
- Service Tickets for our sample of 25 New Hires, dated March 18, 2006, November 7, 2008, November 14, 2008, December 5, 2008, and March 5, 2009
- List of individuals with access to TSP areas, dated April 21, 2009
- Datacenter Access Listing, dated April 21, 2009
- Rationales for employees with access to FRTIB areas
- Separated Employee Listing for employees separating since October 1, 2008
- LAN Access Listing
- Maryland Call Center Proxy Listing
- Statement of Work (SOW), dated June 30, 2008
- Privacy Act Training Sign-in Log, dated May 19-20, 2009

## ENTRANCE AND EXIT CONFERENCE ATTENDEES

An overall entrance conference, covering the entire FY 2009 TSP audit plan and proposed schedule, was held at the Agency on November 19, 2008. Attendees were as follows:

A. Federal Retirement Thrift Investment Board's Staff

|              |   |
|--------------|---|
| Jim Petrick  | Chief Financial Officer                             |
| Mark Hagerty | Chief Information Officer (CIO)                     |
| Penny Moran  | Director, Office of Participant Services            |
| Anne Beemer  | Controller, Office of Finance                       |
| Mark Allen   | IT Security Specialist                              |
| Susan Smith  | Deputy CIO, Software and Applications<br>Management |

B. Department of Labor, Employee Benefits Security Administration

|                |                                  |
|----------------|----------------------------------|
| William Bailey | Senior Auditor, FERSA Compliance |
|----------------|----------------------------------|

C. KPMG LLP

|                  |                          |
|------------------|--------------------------|
| Heather Flanagan | Partner                  |
| Don Farineau     | Partner                  |
| Derek Thomas     | Manager                  |
| Mark Munster     | Computer Systems Analyst |

ENTRANCE AND EXIT CONFERENCE ATTENDEES, CONTINUED

An entrance conference was held with the Agency on February 19, 2009. Attendees were as follows:

A. Federal Retirement Thrift Investment Board Staff

|                   |  |
|-------------------|--|
| Jim Petrick       | Chief Financial Officer                  |
| Penny Moran       | Director, Office of Participant Services |
| Mark Hagerty      | Chief Information Officer                |
| Anne Beemer       | Controller, Office of Finance            |
| Bonnie Parazinski | Call Center Manager                      |
| Sue Peine         | Benefits Operation Manager               |
| Stella Lane       | Senior Financial Specialist              |

B. Department of Labor, Employee Benefits Security Administration

|                |                                  |
|----------------|----------------------------------|
| William Bailey | Senior Auditor, FERSA Compliance |
|----------------|----------------------------------|

C. KPMG LLP

|                  |                          |
|------------------|--------------------------|
| Derek Thomas     | Manager                  |
| David Ferrara    | Senior Accountant        |
| Mark Munster     | Computer Systems Analyst |
| David Strich     | Computer Systems Analyst |
| Alexandra Strich | Computer Systems Analyst |

ENTRANCE AND EXIT CONFERENCE ATTENDEES, CONTINUED

An exit conference was held on November 9, 2009, with the Agency. Attendees were as follows:

A. Federal Retirement Thrift Investment Board

|                   |   |
|-------------------|---|
| Jim Petrick       | Chief Financial Officer   |
| Penny Moran       | Director, Office of Participant Services                                  |
| Mark Hagerty      | Chief Information Officer   |
| Roy Friend        | Deputy Chief Information Officer, Software<br>and Applications Management |
| Troy Poppe        | Information Security Program Manager                                      |
| Bonnie Parazinski | Call Center Manager   |

B. Department of Labor, Employee Benefits Security Administration

|                |                                  |
|----------------|----------------------------------|
| William Bailey | Senior Auditor, FERSA Compliance |
|----------------|----------------------------------|

C. KPMG LLP

|              |                          |
|--------------|--------------------------|
| Derek Thomas | Manager                  |
| Mark Munster | Computer Systems Analyst |
| Evans Bannor | Computer Systems Analyst |