

Employee Benefits Security Administration

Performance Audit of the Thrift Savings Plan Participant Support Operations

August 30, 2021

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EXECUTIVE SUMMARY

Members of the Federal Retirement Thrift Investment Board 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 and Contact Center Operations processes. We performed our fieldwork remotely from February 22, 2021 through June 25, 2021. Our scope period for testing was January 1, 2020 through March 31, 2021.

We conducted this performance audit in accordance with the performance audit standards contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and the American Institute of Certified Public Accountants' *Standards for Consulting Services*. *Government Auditing Standards* require that we plan and perform the audit to obtain sufficient, appropriate audit 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 are defined in EBSA's *Thrift Savings Plan Fiduciary Oversight Program*, which includes the National Institute of Standards and Technology Special Publication 800-53, Revision 4, *Security and Privacy Controls for Federal Information Systems and Organizations*; United States Code (USC) Title 5, Chapter 84; and Code of Federal Regulations (CFR) Title 5, Parts 1630 and 1640.

The objectives of our audit over the TSP participant support process were to:

• Determine whether the Agency implemented certain procedures to (1) provide timely and accurate TSP information to participants; (2) prepare quarterly statements for participants that reflect the activity for the period; (3) prepare annual statements for participants that summarize all transactions made during the previous calendar year by transaction type; (4) respond to

participants' and Congressional inquiries in an accurate and timely manner; (5) process confirmation and reject notices accurately, and distribute them in a timely manner; (6) enforce physical access controls at the contact centers; (7) enforce caller authentication and privacy controls at the contact centers; and (8) monitor the contact centers' contractors for compliance with the terms of the contract.

- To determine whether the Agency implemented certain procedures to secure Agency resources deployed to contact center personnel and protect participant information accessed remotely by contact center personnel during the Agency's response to the coronavirus pandemic.
- Determine the status of the prior EBSA TSP open recommendations reported in *Performance Audit of the Thrift Savings Plan Participant Support Operations*, dated December 14, 2018, and *Performance Audit of the Thrift Savings Plan Dallas Contact Center*, dated September 6, 2019.

We present three new findings and recommendations, one of which addresses fundamental controls and two of which address other controls. Fundamental control recommendations address significant¹ 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 participant support process. The Agency should review and consider these recommendations for timely implementation. Section III.C presents the details that support the current year findings and recommendations.

Based upon the performance audit procedures conducted and the results obtained, we have met our audit objectives. We conclude that for the period January 1, 2020 through March 31, 2021, the Agency implemented certain procedures to (1) provide timely and accurate TSP information to participants; (2) prepare quarterly statements for participants that reflect the activity for the period; (3) prepare annual statements for participants that summarize all transactions made during the previous calendar year by transaction type; (4) respond to participants' and Congressional inquiries in an accurate and timely manner; (5) process confirmation and reject notices accurately, and distribute them in a timely manner; (6) enforce physical access controls at the contact centers; (7) enforce caller authentication and privacy controls at the contact centers; and (8) monitor the contact

¹ Government Auditing Standards section 8.15 defines significance in the context of a performance audit.

centers' contractors for compliance with the terms of the contract. As a result of our compliance testing, we did not identify any instances of noncompliance with 5 USC 8439(c) or Agency Regulations. In addition, the Agency implemented certain procedures to secure Agency resources deployed to contact center personnel and protect participant information accessed remotely by contact center personnel during the Agency's response to the coronavirus pandemic. However, as noted above, we noted internal control weaknesses in certain areas of the TSP participant support process.

We also reviewed ten prior EBSA recommendations related to the TSP Participant Support and Contact Center processes to determine their current status. Section III.B documents the status of these prior recommendations. In summary, six recommendations have been implemented and closed, one recommendation has been partially implemented but is considered closed, and three recommendations have been partially implemented and remain open.

The Agency's responses to the recommendations are included as an appendix within the report (Appendix A). The Agency concurred with all recommendations.

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. We caution 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.

While we understand that this report may be used to make the results of our performance audit available to the public in accordance with *Government Auditing Standards*, this report is intended for the information and use of the U.S. Department of Labor Employee Benefits Security Administration, Members of the Federal Retirement Thrift Investment Board, and Agency management. The report is not intended to be, and should not be, used by anyone other than these specified parties.



August 30, 2021

I. BACKGROUND OF THE TSP AND PARTICIPANT SUPPORT OPERATIONS

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. The TSP began accepting contributions on April 1, 1987, and as of March 31, 2021, had approximately \$763 billion in assets and approximately 6.3 million participants.²

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

B. 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 answering participant inquiries and distributing participant statements and other communications materials.

1. Participant Inquiries³

Generally, Federal employees and uniformed services members are initiated to the TSP through contact from their employers' personnel offices. Federal agency and uniformed service personnel offices are the primary TSP point of contact for actively employed TSP participants. Federal agency and uniformed service personnel offices provide the following participant support functions:

I.1

² Source: FRTIB April 2021 Board Meeting Minutes posted on https://www.frtib.gov/MeetingMinutes/index.html

³ Sources:

- Inform all eligible employees/members of TSP options and benefits;
- Maintain adequate supplies of participant TSP election forms (if used by the employer)⁴, booklets, and publications to facilitate participation;
- Determine retirement coverage;
- Provide and collect TSP election forms (Form TSP-1 or Form TSP-U-1);
- 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.

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 contact centers. The centers also handle inquiries about loans, investment allocations, in-service withdrawals, and other benefits received from active participants. With respect to active participants, either personnel or payroll offices can communicate with the contact centers or the Agency on behalf of the participants, or the participants can communicate with the TSP contact centers directly, depending on the issue. Inquiries that cannot be sufficiently addressed by the contact centers are escalated to the Agency's Office of External Affairs (OEA). The OEA Director or staff logs these inquiries in the Agency's internal monitoring system, which the Agency uses to manage inquiry status and monitor response timeliness. Both the Agency and the contact centers have direct contact with participants and beneficiaries by mail, secure messaging (e-messages), and telephone. The Agency works with the contact centers to coordinate information needed to answer participants' inquiries. The Agency and contact centers manage participant information and communications in accordance with the privacy requirements in Code of Federal Regulations (CFR) Title 5, Part 1630.7(b-c).

The TSP correspondence unit at the contact centers are 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

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

allocations, loans, or in-service withdrawals) are handled by the contact 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.

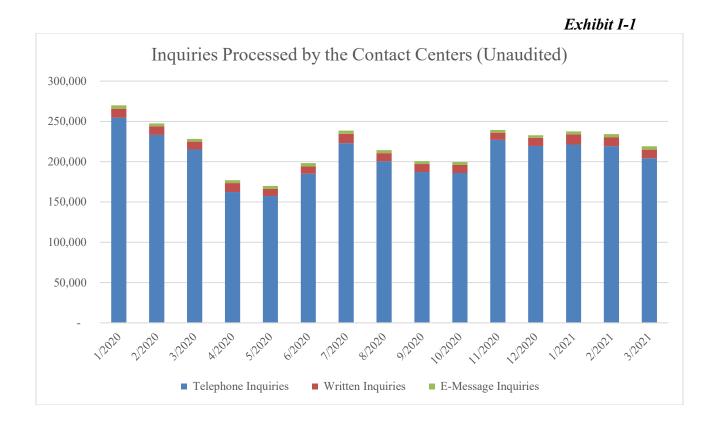
Once the assigned correspondence agent begins work on the correspondence, he or she is responsible for resolving the inquiry and responding to the participant, either via a phone call or letter. The correspondence agent first reviews the correspondence for completeness. Participants who do not adequately 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 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.

TSP participants can also submit inquiries via secure messaging through the TSP website. Secure messages, referred to as e-messages, are received at the contact centers. The contact centers use an e-messaging system to manage and respond to e-messages. When a message is received, the system automatically sends a reply to the participant stating that the message has been received and the participant will receive a response within 24 hours. When a new message comes in, it is automatically added into the e-messaging system inbox and addressed in a first-in, first-out manner. When an e-messaging representative becomes available, he or she is assigned the next available message from the inbox. The representative may put a response on hold if he or she is unable to provide an answer to the inquiry and needs to escalate the request or must perform additional research. Putting the message on hold prompts an automated message to the participant stating that the question is under review and a response will be provided shortly.

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 OEA Director or staff logs these inquiries in a similar manner as non-Congressional inquiries escalated to the Agency. Although most of the correspondence is addressed by the OEA, the Office of Participant Operations and Policy or Office of General Counsel may assist with research and resolving issues or drafting the letters, as needed.

During the scope period of this performance audit, the TSP processed approximately 3.1 million TSP participant telephone inquiries, approximately 156,000 written inquiries, and approximately 56,000 e-messages. The TSP most frequently processes inquiries regarding post-separation withdrawals. During the scope period of this audit, inquiries related to this area accounted for approximately 15 percent of all inquiries processed by the TSP⁵. Other high-activity areas include account maintenance (e.g., password resets) and transaction verifications.

Exhibit I-16 illustrates the number of written, telephone, and e-messaging inquiries processed by the TSP from January 2020 through March 2021.



⁵ Source: Monthly FRTIB Board Meeting minutes for the period February 2020 through April 2021

⁶ Source: Monthly FRTIB Board Meeting minutes for the period February 2020 through April 2021

2. Participant Statements⁷

The TSP issues participant statements in accordance with the requirements of 5 CFR Part 1640 and United States Code Title 5, Section 8439(c). Each year, the TSP issues quarterly statements to participants in January, April, July, and October. The quarterly statements cover all transactions in a participant's accounts that occurred during the previous three months. The statements also summarize the loan activity for those TSP participants with loans. Quarterly statements are available to participants online via the TSP website, and participants can request that a paper statement be mailed.

The TSP also issues annual statements each year in February. The annual statement summarizes the financial activity in the participant's account for the previous calendar year and provides other important information such as a participant's personal investment performance and the participant's primary beneficiary information. The annual statements are available online via the TSP website and are also mailed to the participants, unless they request to only receive their annual statements electronically.

C. Description of the TSP Contact Centers⁸

1. Overview of Contact 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 website (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 contact center PSR. The call is routed to one of the three contact centers, based on an Agency pre-determined call-volume load setting, through its telecommunications provider. While the inbound call volumes generally are divided between three contact centers, the contact center exclusively handles the Telecommunications Device for the Deaf (TDD) calls because 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.

⁷ Source: Summary of the Thrift Savings Plan booklet, version January 2021

⁸ Sources:

The three competitively selected contact centers are staffed by a contact 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, information technology (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 ________ contact center is a Government owned/Contractor operated (GOCO) facility, while the _______ contact centers are a Contractor owned/Contractor operated (COCO) facility. As a result, some operational differences exist. However, wherever possible, the three centers operate the same, using the same performance metrics and requirements, contact center technology, knowledge database, and materials. The goal of the Agency is to achieve transparency for participants so that they receive a consistent experience regardless of which contact 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.,), 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 directing the PSRs and managing performance metrics (i.e., service level is being achieved) that are reported via the software. 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 contact center manager serves as a backup to the contact 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 contact center manager is responsible for the overall contract performance. Processes are in place for the contact center manager to evaluate operations performance as it pertains to contractual requirements (i.e., the achievement of contract performance standards).

I.6

2. Customer Service Delivery¹⁰

The contact 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 contact center operation depends on the proper blend of people, implemented processes, and enabled technologies, employed together towards consistent customer service. The TSP's contact centers' service delivery and customer service capabilities and performance can be separated into the following areas: a) Quality Assurance and Customer Feedback Program; b) Service Delivery Procedures; c) Performance Metrics; and d) Technology Support.

a. Quality Assurance and Customer Feedback Program

The Agency has a Quality Assurance (QA) program and a Customer Satisfaction survey process to collect and analyze feedback through the contact centers. Both programs were developed and maintained with the assistance of consulting groups.

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 which to listen so that they can review each PSR's activity each month. The contact centers employ quality monitoring software, which records the audio and screen shot activity of the call. The quality assurance coordinators select and evaluate calls using their experience with the program and customer service training, and score attributes of the call under the categories of foundation skills and finesse skills.

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 contact centers. The calibration sessions are intended to create a common

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¹⁰ Sources:

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 calls 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 participants contact with the contact center. If the participant cannot be reached within three days of the initial contact, then the call will not be included in the survey.

b. Service Delivery Procedures

TSP call handling procedures are designed to address all potential scenarios that may occur. Examples of these procedures 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 cannot 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.

TSP call handling procedures 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 PSR or observing the call within a controlled environment. This technique is used to improve the PSRs' call handling capabilities before taking 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 discussed above, QA 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 contact 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 website postings, example

questions and answers (Q's and A's), and TSP Highlights. The TSP website also provides forms, publications, and plan news, among other items. These communications can reduce the number of routine telephone calls that the contact centers receive. In addition, a weekly call among all TSP operational units is held to discuss, among other topics, issues that are impacting, or could impact, the volume of calls and repeat inquiries that the contact centers have experienced.

c. Performance Metrics

Performance metrics manage, measure, and monitor the effectiveness and efficiency of the contact centers in areas such as time to answer, time on hold, abandonment rate, first contact resolution, and staff productivity. The performance metrics are contractual requirements of the contact centers.

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

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

d. Technology Support

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

Internet; however, access is restricted by the contact centers. E-mail is available at one of the centers. Supervisor and team lead workstations include full Internet access for purposes of performing research.

The core applications used by the PSRs include the appli	cation, and the
The application is the	customer account history and
inquiry logging software used to provide participants with inform	ation related to their accounts
(such as account balance, loan, contribution, and withdrawal information)	ation). The server resides
and the Agency, via a contractor, performs user admini	stration of the application.
The application is used by PSRs for functions including ide	entification of work-in-process
loan and withdrawal requests, research, and transmittal of fax-back	ck materials to participants at
their request. The server resides in and the Agen	ncy, via a contractor, performs
user administration of the application.	
The used by the Agency ar	nd both contact centers provide
the ability to keyword search a database of common inquiries ar	nd resolutions. The tool also
contains a bulletin board feature that contains links to common quest	tions and answers or upcoming
events and program changes. Additionally, e-messages (messages re	eceived, responses, and related
notes) are maintained in the system database. Maintenance of	the knowledge database is a
collaborative effort by the Agency and the contact centers. The serve	er on which it resides is located
in Carlotte	

Service level achievement is monitored as it occurs and gives the supervisor real-time information such as calls on hold, calls abandoned, and Telephone Service Factor (the number of calls answered during a given amount of time, in seconds).

The workforce management capability is used to forecast workforce requirements corresponding to pre-established service levels. Workforce management also provides the schedule required to fulfill the work forecast in order to meet the demand of the service level variables and support 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 call management capability is used for the quality monitoring process as described above. Every call is recorded, and call records are maintained on the servers at the primary data center in

e. Coronavirus Pandemic Response

In March 2020, contact center operations and personnel transitioned to a remote work environment due to the Coronavirus pandemic. Throughout the scope period, contact center personnel were given the option to work remotely or on-site. As part of the transition to a remote environment, contact center personnel were provided with formal guidance and security requirements, and were required to sign telework agreements. All other existing controls remained in place.

II. OBJECTIVE, SCOPE, AND METHODOLOGY

A. Objective

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

The objectives of our performance audit were to:

- Determine whether the Agency implemented certain procedures to (1) provide timely and accurate TSP information to participants; (2) prepare quarterly statements for participants that reflect the activity for the period; (3) prepare annual statements for participants that summarize all transactions made during the previous calendar year by transaction type; (4) respond to participants' and Congressional inquiries in an accurate and timely manner; (5) process confirmation and reject notices accurately, and distribute them in a timely manner; (6) enforce physical access controls at the contact centers; (7) enforce caller authentication and privacy controls at the contact centers; and (8) monitor the contact centers' contractors for compliance with the terms of the contract.
- To determine whether the Agency implemented certain procedures to secure Agency resources deployed to contact center personnel and protect participant information accessed remotely by contact center personnel during the Agency's response to the coronavirus pandemic.
- Determine the status of the prior EBSA TSP open recommendations reported in *Performance Audit of the Thrift Savings Plan Participant Support Operations*, dated December 14, 2018, and *Performance Audit of the Thrift Savings Plan Contact Center*, dated September 6, 2019.

B. Scope and Methodology

We conducted this performance audit in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States and the American Institute of Certified Public Accountants' *Standards for Consulting Services*, using EBSA's *Thrift Savings Plan Fiduciary Oversight Program*. Our scope period for testing was January 1, 2020 through March 31, 2021.

We performed the audit 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 assist team members to develop a collective understanding of the activities and controls associated with the applications, processes, and personnel involved with the TSP participant support process. 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 compliance¹¹. We conducted these test procedures remotely due to the COVID-19 pandemic. In Appendix B, we identify the key documentation provided by Agency and contractor personnel that we reviewed during our performance audit.

Our performance audit procedures included using haphazard, non-statistical sampling to select samples of the following:

- Participant statements, to determine if participants received accurate account information;
- Written inquiries and e-messages, to determine if participant written inquiries and e-messages were tracked and responded to in an accurate and timely manner;
- Congressional inquiries, to determine if Congressional inquiries were 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 were processed accurately and distributed in a timely manner;
- Reject notices, to determine if reject notices were processed accurately and distributed in a timely manner;
- Physical access controls at all contact centers;
- Call-related quality assurance reviews for PSRs; and
- Calls authenticated and transactions processed by contact center representatives, to determine if authentication procedures were performed and to determine if transactions were processed accurately.

II.2

We obtained and utilized certain information technology system settings and user listings related to the participant support process, subsequent to the scope period.

Because we used non-statistically determined sample sizes in our sampling procedures, our results are applicable to the sample items we tested and were not extrapolated to the population.

Criteria used for this engagement are defined in EBSA's *Thrift Savings Plan Fiduciary Oversight Program*, which includes 5 USC Chapter 84 and 5 CFR Parts 1630 and 1640.

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

III. FINDINGS AND RECOMMENDATIONS

A. Introduction

We performed procedures related to the Thrift Savings Plan (TSP) participant support process while conducting a performance audit related to activities at the Federal Retirement Thrift Investment Board's Staff (Agency) headquarters and the three TSP contact centers located in Our scope period for testing was January 1, 2020 through March 31, 2021. This performance audit consisted of reviewing applicable policies and procedures and testing manual and automated processes and controls, which included interviewing key personnel, reviewing key reports and documentation (Appendix B), and observing selected procedures.

Based upon the performance audit procedures conducted and the results obtained, we have met our audit objectives. We conclude that for the period January 1, 2020 through March 31, 2021, the Agency implemented certain procedures to (1) provide timely and accurate TSP information to participants; (2) prepare quarterly statements for participants that reflect the activity for the period; (3) prepare annual statements for participants that summarize all transactions made during the previous calendar year by transaction type; (4) respond to participants' and Congressional inquiries in an accurate and timely manner; (5) process confirmation and reject notices accurately, and distribute them in a timely manner; (6) enforce physical access controls at the contact centers; (7) enforce caller authentication and privacy controls at the contact centers; and (8) monitor the contact centers' contractors to ensure they are in compliance with the terms of the contract. As a result of our compliance testing, we did not identify any instances of noncompliance with United States Code Title 5, Section 8439(c) or Code of Federal Regulations (CFR) Title 5, Parts 1630.7(bc) or 1640. In addition, the Agency implemented certain procedures to secure Agency resources deployed to contact center personnel and protect participant information accessed remotely by contact center personnel during the Agency's response to the coronavirus pandemic. However, we noted internal control weaknesses in certain areas of the TSP participant support process.

We present three new findings and recommendations, presented in Section III.C, related to the TSP participant support process, one of which addresses fundamental controls and two of which address other controls. Fundamental control recommendations address significant ¹² 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

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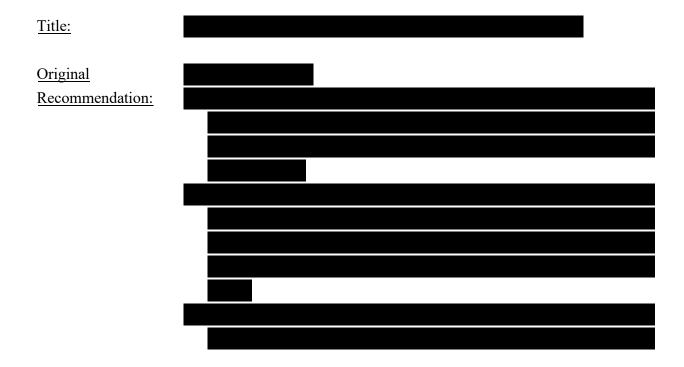
inadequately safeguarded against loss. Other control recommendations address procedures or processes that are less significant than fundamental controls. All recommendations are intended to strengthen the TSP participant support process. The Agency should review and consider these recommendations for timely implementation. The Agency's responses to these recommendations are included as an appendix within this report (Appendix A).

We also reviewed 10 prior EBSA recommendations related to the TSP Participant Support and Contact Center processes to determine their current status. Section III.B documents the status of these prior recommendations. In summary, six recommendations have been implemented and closed, one recommendation has been partially implemented but is considered closed, and three recommendations have been partially implemented and remain open. Section III.C presents the new findings and recommendations from this performance audit. Section III.D summarizes each open recommendation.

B. Findings and Recommendations from Prior Reports

The 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.

2015 Participant Support Process Recommendation No. 6







Disposition:

2015 Participant Support Process Recommendation No. 7

Title: Call Center Contract Oversight Weaknesses

Original Recommendation:

The Agency should complete the following activities related to call center contract oversight and management:

- a) Formalize and document call center contract oversight management procedures and responsible parties to ensure each appropriate Agency office understands its contract oversight roles and responsibilities;
- b) Review and modify each call center contract, as needed, to ensure that all call center contract clauses are relevant, specific, and applicable to each call center environment and clearly delineate responsibilities for Agency and contractor-managed sites;
- c) Ensure timely coordination with the contracting officer for any subsequent changes to the call center contracts; and
- d) Develop, document, and implement procedures to enforce contract compliance with required reporting metrics.

Reason for Recommendation:

We determined that certain contracting oversight weaknesses existed for call centers. Specifically, we noted that Agency management did not:

- Formalize responsibilities across various Agency offices;
- Review or modify call center contracts to ensure clear delineation of responsibilities, where applicable, for Agency and contractormanaged sites;

- Modify call center contracts timely after the Agency determined that portions of Section H of the contracts did not apply or were no longer relevant;
- Monitor the call center monthly to ensure contract compliance with the blocked call metric included in the contract; and
- Monitor the call center to ensure contract compliance with the outbound call metric included in the contract.

Status:

Implemented.

Parts b and c of the original recommendation were closed in the report titled, *Performance Audit of the Thrift Savings Plan Participant Support Operations*, dated May 4, 2017; therefore, they were not included in the scope of our 2018 performance audit.

Part d of the original recommendation were closed in the report titled, *Performance Audit of the Thirft Savings Plan Participant Support Operations*, dated December 18, 2018; therefore, they were not included in the scope of our 2021 performance audit.

a) We inspected the

and noted that the Agency had formalized and documented service provider oversight management procedures and defined responsible parties over the contact centers. As a result, this portion of the recommendation is closed.

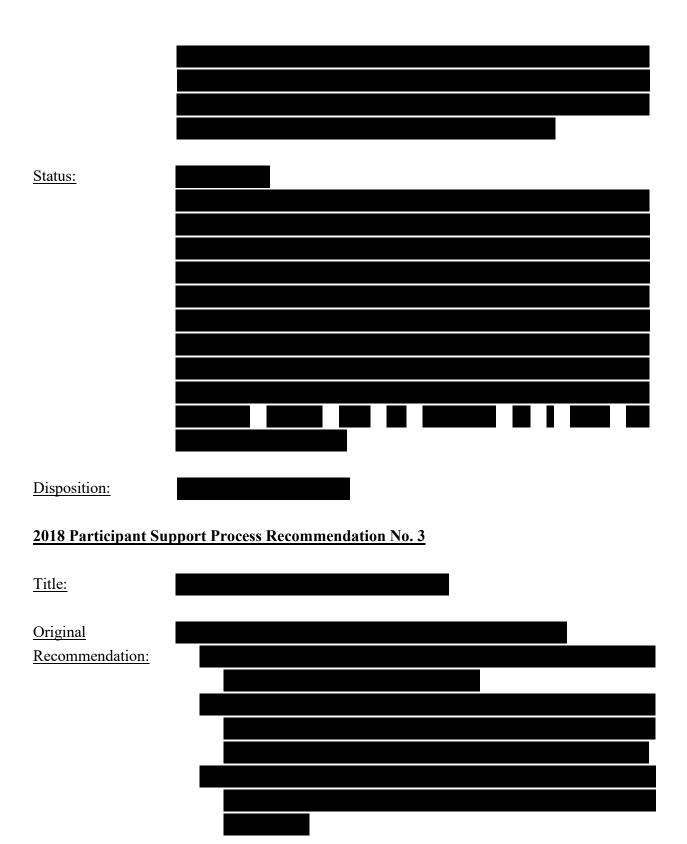
Disposition: Recommendation Closed.

2018 Participant Support Process Recommendation No. 1

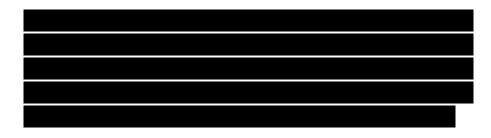
<u>Title:</u>	
<u>Original</u>	
Recommendation:	



Disposition:	
 _	
2018 Participant Su	pport Process Recommendation No. 2
Title:	
<u>Original</u>	
Recommendation:	
Reason for	
Recommendation:	







Disposition:

2018 Participant Support Process Recommendation No. 4

<u>Title:</u> Weaknesses in Contact Center Service Level Compliance and Enforcement

Original Recommendation:

To strengthen contact center compliance with SLRs, the Agency should:

- a. Update its monitoring procedures to define qualitative and/or quantitative parameters for SLR exemptions; and
- b. Review and consider required updates to the contact center contracts for enforcement and accountability of SLR non-compliance.

Reason for Recommendation:

During our scope period, both contact centers significantly missed their service level requirements (SLRs) related to call handling in certain months because of a significant increase in call activity caused by a change in the infrastructure that facilitated a greater number of calls reaching a contact center representative. Specifically, in December 2017 and February 2018, the _________ contact centers missed all of their required metrics, including call response time, call abandonment rate, written correspondence response time ________ and E-Message response time ________ Although both contact centers requested and were granted exemptions for these two months, we noted the following weaknesses with the exemption process:

- Although the Agency developed the

 which allowed for the granting of exemptions from the SLRs, the procedures did not limit the number of exemptions that could be granted within a designated period of time;
- Although both contact center contracts were updated with SLR exemption clauses, they also lacked the limitation noted above;

- For two months selected for testing, we noted that the contact center missed the required deadline of two business days after the end of the reporting period for filing an exemption; however, the contact center was granted the exemption by Agency management with no repercussions; and
- The contact center contracts lacked specific repercussions for noncompliance with defined SLRs.

Status: Partially Implemented.

- a) We determined that weaknesses continued to exist and noted that management did not update its monitoring procedures to define qualitative and/or quantitative parameters for SLR exemptions because they believe that any action taken to limit the number of exemptions that can be granted based on any defined parameters would hinder the Agency's ability to conduct effective business with their contractors. Additionally, because of other weaknesses identified in this process during the current audit, we decided to close this recommendation and consolidate related deficiencies in a new recommendation. As a result, this portion of the recommendation is considered not implemented but closed.
- b) Management confirmed that the COR and CO discussed this prior year audit recommendation during the FY 2018 Participant Support audit and determined, after their analysis, that no changes to the current contracts were warranted, as documented in the Agency's formal response. As a result, this recommendation is considered closed.

Disposition:

Recommendation Closed. Also see recommendation no. 2021-01, Deficiency Related to Contact Center Performance Noncompliance Exemptions, in Section III.C of this report.

2018 Participant Support Process Recommendation No. 5

Title:

Weaknesses in Agency Review of Contact Center Service Organization Reports

Original

To strengthen contact center monitoring controls, the Agency should:

Recommendation:

- a. Develop, document, and implement formal procedures for the review of external reports related to the contact centers; and
- b. Maintain documentation related to Agency review, risk analysis, and mitigation of deficiencies identified in external reports related to the contact centers.

Reason for Recommendation:

The Agency did not appropriately review and consider the deficiencies noted in the _______ contact center's independent auditors' _______ Our inspection of the report noted eight deficiencies were identified at the ______ contact center, but Agency management did not provide evidence demonstrating that all eight deficiencies were reviewed and assessed for risk. Additionally, contact center and Agency management did not provide evidence to indicate that all deficiencies identified were addressed and corrective actions were taken to mitigate the associated risks.

Additionally, the Agency did not appropriately review and consider the deficiencies noted in the contact center's independent accountants'

Our inspection of the report noted six deficiencies were identified at the contact center, but Agency management did not provide evidence demonstrating that all six deficiencies were reviewed and assessed for risk. Contact center and Agency management did not provide evidence to indicate that all deficiencies identified were addressed and corrective actions were taken to mitigate the associated risks.

Status:

Implemented.

a) We inspected the

and
noted the Agency developed, documented and implemented
procedures for the review of external reports related to the contact
centers. As a result, this part of the recommendation is closed.

b) Management maintained documentation related to the Agency's review, risk analysis, and mitigation of deficiencies identified in external reports related to the contact centers. Specifically, we obtained evidence of the Agency's Tracking Log for the contact centers and evidence of remediation related to findings reported

As a result, this part of the recommendation is closed.

Disposition:

Recommendation Closed.

Contact Center Recommendation No. 1

Title:

Weaknesses in Monitoring Contact Center Controls

Original

To strengthen contact center monitoring controls, the Agency should:

Recommendation:

- a. Coordinate with and provide documentation as requested to the CO to modify contact center contracts timely; and
- b. Develop, document, and implement formal monitoring procedures over internal controls at the including enforcement of contractual obligations and deliverables.

Reason for Recommendation:

Weaknesses exist with the Agency's process for monitoring controls in place at the contact centers. Specifically:

a. The Agency did not obtain a report from the contractor for the period of October 1, 2017 through September 30, 2018, as required by contract.

Agency management stated that the was an extension of the existing Contact Center under the terms of the contact center contract, and therefore

- would still be subject to this reporting requirement. The contract was not modified to set aside this requirement in the 2018 task order, resulting in non-compliance with the terms of the contract and a lack of assurance over contact center controls during the period.
- b. The Agency established a new contract with the contact center contractor, effective April 1, 2019, in which an engagement would be performed over the contractor's contact centers, in place of a engagement. However, because this engagement would cover April through September 2019, the Agency would have no assurance over controls from go-live on November 2, 2018 through March 31, 2019.

Status: **Implemented.**

- a) The Agency indicated that no contract modifications related to deliverables were considered necessary during the scope period. Further, we confirmed that unlike previously reported, the reports for the contact centers were completed and delivered timely, in accordance with contractual requirements. The Agency indicated that no contract modifications related to report deliverables were considered necessary during the scope period. As a result, this portion of the recommendation is closed.
- and noted that the Agency defined responsible parties and designed, documented and implemented procedures for the oversight of contact center contract requirements. These procedures include the Contact Center. As a result, this portion of the recommendation is closed.

Disposition: **Recommendation Closed.**

Contact Center Recommendation No. 2

<u>Title:</u> Untimely Removal of Physical Access

Original Recommendation:

To strengthen physical access controls, the Agency should fully implement physical access procedures that require timely access removal of terminated employees and contractors and effective quarterly recertifications of physical access.

Reason for Recommendation:

Controls over the removal of physical access did not function effectively at the Specifically:

- Agency management did not deactivate three contractors' physical badge access timely upon termination;
- For 2 terminated contractors selected for testing, Agency management did not provide evidence of timely removal of physical access to the facility;
- While testing the timing of all badge access removals, we identified one additional user for whom badge access was not deactivated timely upon termination (i.e., 187 days after termination); and
- The quarterly recertification control failed to identify and remove access for the terminated individuals noted above.

Status: **Implemented.**

We noted management retains evidence of badge deactivation for terminated users from the Contact Center. We obtained and inspected evidence of badge deactivation for a sample of 10 terminated users and noted all 10 users' badges were deactivated timely upon notice of termination.

<u>Disposition:</u> Recommendation Closed.

2019 Contact Center Recommendation No. 3

<u>Title:</u>		
<u>Original</u>		
Recommendation:		
Reason for		
Recommendation:		
Status:		
<u>Status.</u>		
Disposition:	I	

C. 2021 Findings and Recommendations

While conducting our performance audit over the TSP participant support process, we identified three new findings and developed three related recommendations. EBSA requests appropriate and timely action for each recommendation.

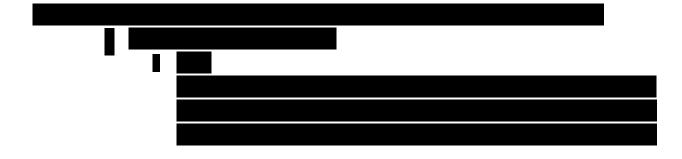
FUNDAMENTAL CONTROL FINDING AND RECOMMENDATION

2021-01: Deficiency Related to Contact Center Performance Noncompliance Exemptions

For	months tested,	contact center mana	gement did not request an exemption	on for
perform	mance noncompliance timely	. Specifically,	contact center management requ	iested
and wa	as granted an exemption for p	erformance noncompl	iance related to Call Response Tim	ne and
Writte	n Correspondence Response	Time on March 5,	2021 for the month of January	2021.
Howev	ver, the exemption was reque	ested after the contrac	tual deadline of two business days	after
the rep	oorting period end.			
During	g the month of January 2021,	the contact c	enter experienced staffing attrition	. The
	contact center managemen	nt was not aware that	they could request an exemption of	lue to
attritio	n and therefore, did not requ	est one timely.		

The Government Accountability Office's (GAO) Standards for Internal Control in the Federal Government states:

- 5 Enforcement of Accountability [...]
 - 5.02 Management enforces accountability of individuals performing their internal control responsibilities. [...] Accountability for performance of internal control responsibility supports day-to-day decision making, attitudes, and behaviors. Management holds personnel accountable through mechanisms such as performance appraisals and disciplinary actions. [...]





1. The Agency should document, define and enforce allowable uses of the exemption clause with its contractors.

Deficiencies related to contact center performance noncompliance exemptions could result in contract compliance issues and the delivery of a poor participant support experience.

OTHER CONTROL FINDINGS AND RECOMMENDATIONS

2021-02: Quality Assurance Monitoring Control Deficiency

We inspected the		
	for the months of Marc	ch 2020, April 2020, January 2021, and February 2021.
The reports did no	ot include sufficient evid	dence of Quality Assurance monitoring in accordance
with the procedure	es outlined in the	
		Specifically, the quality workbook did not
include separate ta	abs for each agent to prov	vide a summary of the feedback and performance scores
for tasks that were	e selected for QA.	
This condition oc	curred because the Ager	ncy inadvertently failed to enforce Agency procedures
requiring the		be consistently prepared by the Quality Assurance
Specialists of its v	rendors.	

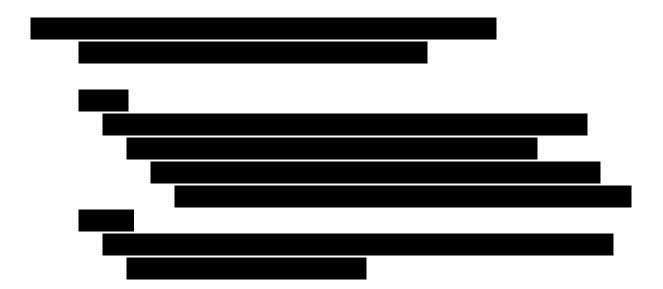
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5.02 Management enforces accountability of individuals performing their internal control responsibilities. [...] Accountability for performance of internal control responsibility supports day-to-day decision making, attitudes, and behaviors. Management holds personnel accountable through mechanisms such as performance appraisals and disciplinary actions. [...]

16 Perform Monitoring Activities [...]

- 16.02 Management establishes a baseline to monitor the internal control system. [...] The baseline represents the difference between the criteria of the design of the internal control system and condition of the internal control system at a specific point in time.
- 16.03 Once established, management can use the baseline as criteria in evaluating the internal control system and make changes to reduce the difference between the criteria and condition.



2. To strengthen quality assurance controls, the Agency should reinforce through written communication the contractor requirements and responsibilities communicated in a for the preparation of the monthly.

Weaknesses in the Quality Assurance monitoring program may increase the risk of inquiry mishandling by contact center representatives, potentially resulting in inaccurate or untimely responses and a poor participant support experience.

2021-03: Quality Performance Initiative Deficiency

For Participant Support Representatives (PSRs) at the contact center, we noted that the Quality Performance Initiative (QPI) was not performed for an individual whose quality performance average fell below 75% for the month of November 2020.
This condition occurred because the Agency did not enforce requirements. The contact center personnel indicated that they overlooked the QPI reporting requirement for the individual noted; however, they indicated that the PSR informally addressed the performance issue and the individual's score increased in the subsequent month.
The Government Accountability Office's (GAO) Standards for Internal Control in the Federal Government states:
5 Enforcement of Accountability []
5.02 Management enforces accountability of individuals performing their internal control responsibilities. [] Accountability for performance of internal control responsibility supports day-to-day decision making, attitudes, and behaviors. Management holds personnel accountable through mechanisms such as performance appraisals and disciplinary actions. []
16 Perform Monitoring Activities []
16.02 Management establishes a baseline to monitor the internal control system. [] The baseline represents the difference between the criteria of the design of the internal control system and condition of the internal control system at a specific point in time.
16.03 Once established, management can use the baseline as criteria in evaluating the internal control system and make changes to reduce the difference between the criteria and condition.

3. The Agency should reinforce through written communication the requirements of the Agency's including requirements to perform and document the QPI plan.

Weaknesses in controls over contact center representative performance monitoring may increase the risk of contact centers not meeting performance requirements and contribute to a poor participant support experience.

D. Summary of Open Recommendations

2015 RECOMMENDATION
RECOMMENDATION TO ADDRESS FUNDAMENTAL CONTROL
2018 RECOMMENDATIONS
RECOMMENDATIONS TO ADDRESS FUNDAMENTAL CONTROLS

2021 RECOMMENDATIONS

RECOMMENDATION TO ADDRESS FUNDAMENTAL CONTROL

Deficiency Related to Contact Center Performance Noncompliance Exemptions

1. The Agency should document, define and enforce allowable uses of the exemption clause with its contractors.

RECOMMENDATIONS TO ADDRESS OTHER CONTROLS

Quality Assurance Monitoring Control Deficiency

2.	To strengthen qual	ity assurance	controls, the	Agency should reinfor	rce through writt	en
	communication th	e contractor	requirements	and responsibilities	communicated	in
				for the preparation	of the monthly	

Quality Performance Initiative Deficiency

3.	The Agency should reinforce through writ	tten commun	nication the red	quirements o	f the
	Agency's	including	requirements	to perform	and
	document the QPI plan.				

AGENCY'S RESPONSE



FEDERAL RETIREMENT THRIFT INVESTMENT BOARD 77K Street, NE Washington, DC 20002

August 30, 2021

Mr. Michael Auerbach
Chief Accountant
Employee Benefits Security Administration
United States Department of Labor
Suite 400
122 C Street, N.W.
Washington, D.C. 20001-2109

Dear Michael:

This is in response to KPMG's email dated August 09, 2021, transmitting the KPMG LLP draft report entitled Employee Benefits Security Administration Performance Audit of the Thrift Savings Plan Participant Support Operations dated August 09, 2021. My comments with respect to this report are enclosed.

Thank you once again for the constructive approach that the Department of Labor and its contractors are taking in conducting the various audits of the TSP. The information and recommendations that are developed as a result of your reviews are useful to the continued improvement of the Thrift Savings Plan.

Very truly yours,

Ravindra Deo

Enclosure

Participant Support - Appendix A

Executive Director's Staff Formal Comments on the Employee Benefits Security Administration Performance Audit of the Thrift Savings Plan Participant Support Process

FUNDAMENTAL CONTROL FINDINGS AND RECOMMENDATIONS

2015 Participant Support Process Recommendation No. 6:	
Agency Response:	
2018 Participant Support Process Recommendation No. 1:	
Agency Response:	

2018 Participant Support Process Recommendation No. 3: **Agency Response:**



2021 Participant Support Process Recommendation No. 1:

2021-01: Deficiency Related to Contact Center Performance Noncompliance Exemptions (Fundamental Control)

Recommendation:

The Agency should document, define and enforce allowable uses of the exemption clause with its contractors.

Agency Response:

The agency concurs with this recommendation and considers it closed. The COR has addressed with the contact centers the contractual requirements regarding timing of exemption requests. A formal reminder of the exemption request requirements was sent to and acknowledged by each of the contact center vendors on August 11, 2021.

2021 Participant Support Process Recommendation No. 2:

2021-02: Quality Assurance Monitoring Control Deficiency (Other Control)

Recommendation:

To strengthen quality assurance controls, the Agency should reinforce through written communication the contractor requirements and responsibilities communicated in for the preparation of the monthly

Agency Response:

The Agency concurs with this recommendation and considers it closed. OPS worked with the vendors to update the monthly quality reports and related SOP document to improve monitoring of both overall and individual QA scores for phone, written, and e-messaging functions. The agency has been receiving updated monthly contractor reports since May 2021.

2021 Participant Support Process Recommendation No. 3:

2021-03: Quality Performance Initiative Deficiency (Other Control)

Recommendation:

The Agency should reinforce through written communication the requirements of the Agency's including requirements to perform and document the QPI plan.

Agency Response:

The Agency concurs with this recommendation and considers it closed. OPS worked with the vendors to update their standard operating procedures to report, on a monthly basis, when the plan has been presented to an agent. The agency has been receiving updated monthly contractor reports since May 2021.

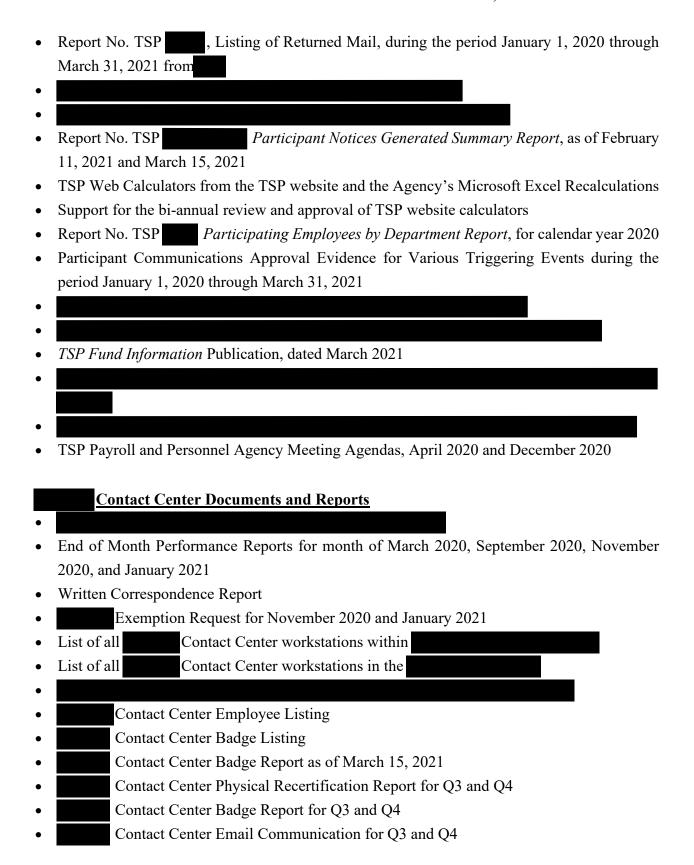
KEY DOCUMENTATION AND REPORTS REVIEWED

Federal Retirement Thrift Investment Board's Staff (Agency's) Documents and Reports

Contact Center Contract Contact Centers Contract E-Messaging Metric Report Screenshots, dated February 11, 2021 Removable Media Observation Screenshots, dated February 11, 2021 Removable Media Exemption Lists Screenshots, dated February 11, 2021 Risk Acceptance Request Form – Removable Media Encryption Status Inquiry Email Response Quality Assurance Report

QPI Non-Compliance Evidence
Monthly Congressional Correspondence Summaries during the period January 1, 2020 through March 31, 2021
Control Log for Congressional Inquiries, for the period January 2020 through Marc 2021
Control Log for Congressional Inquiries, for the period January 2021 through March 2021
Listings of Written Inquiries and e-Messages from and during the period January 1 2020 through March 31, 2021
Non-Congressional Quality Control Reports during the period January 1, 2020 through Marc 31, 2021
Non-Congressional Correspondence Summaries and KPI Reports for each contact center during the period January 1, 2020 through March 31, 2020

completion e-mails



- Monthly Contact Center Employee Listing for period from January 1, 2020 through March 31, 2021
- and Contact Center Re-hire Evidence
- Contact Center Termination Spreadsheet
- Quality Assurance (QA) Specialist Duties
- Contact Center QPI Program

March 31, 2021

Contact Center Documents and Reports and **Contact Centers** Remediation Documentation for End of Month Performance Reports for month of March 2020, September 2020, November 2020, and January 2021 for and **Contact Centers** • Written Correspondence Report Exemption Request for November 2020 List of all Contact Center workstations within • List of all Contact Center workstations in the List of all Contact Center workstations within List of all Contact Center workstations in the Contact Center Employee Listing Contact Center Employee Listing Contact Center Badge Listing Contact Center Badge Listing Contact Center Badge Report as of March 15, 2021 Contact Center Badge Report as of March 15, 2021 Contact Center Physical Recertification Report for Q3 and Q4 Contact Center Badge Report for Q3 and Q4 Contact Center Email Communication for Q3 and Q4 Contact Center Physical Recertification Report for Q3 and Q4 Contact Center Badge Report for Q3 and Q4 Contact Center Email Communication for Q3 and Q4 Monthly Contact Center Employee Listing for period from January 1, 2020 through

- Monthly Contact Center Employee Listing for period from January 1, 2020 through March 31, 2021
- Contact Center Re-hire Evidence
- Contact Center Termination Spreadsheet
- Contact Center Termination Spreadsheet
- Contact Center Quality Assurance (QA) Specialist Duties
- Contact Centers Quality Assurance Report for months of March 2020, September 2020, and November 2020
- Contact Center QPI Program