

Employee Benefits Security Administration

Performance Audit of Thrift Savings Plan Roth Option Communications at Selected Federal Agencies and Uniformed Services

September 30, 2013

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EXECUTIVE SUMMARY

Members of the Federal Retirement Thrift Investment Board Washington, D.C.

Ian Dingwall
Chief Accountant
U.S. Department of Labor, Employee Benefit Security Administration
Washington, D.C.

As part of the U.S. Department of Labor Employee Benefits Security Administration (EBSA) Fiduciary Oversight Program, we conducted a performance audit of Thrift Savings Plan (TSP) Roth option communications at selected Federal agencies and uniformed services. Our fieldwork was performed from February 14, 2013 through May 10, 2013, primarily at the selected Federal agencies and uniformed services. Our scope period for testing was January 1, 2011 through January 31, 2013.

We conducted this audit in accordance with the performance audit standards 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 audit evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objective. Criteria used for this audit is defined in TSP Bulletin 10-13, *Implementation of Roth Thrift Savings Plan Contributions*, Section VI.C for Federal agencies and TSP Bulletin 11-U-4, *Implementation of Roth Thrift Savings Plan Contributions*, Section VI.C for uniformed services, which require agencies and services to provide information to their employees and service members regarding the availability of the TSP Roth option and how it can be incorporated into their retirement planning.

The objectives of our audit over TSP Roth option communications were to:

 Determine if the selected Federal agencies and uniformed services implemented procedures to address the requirements of TSP Bulletin 10-13 or TSP Bulletin 11-U-4, respectively, related to providing information to their employees and service members regarding the availability of the TSP Roth option and how it can be incorporated into their retirement planning; and

• Test compliance with TSP Bulletin 10-13, Section VI.C at the selected Federal agencies or TSP Bulletin 11-U-4, Section VI.C at the selected uniformed services.

Based upon the performance audit procedures conducted and the results obtained, we have met our audit objective. We conclude that for the period January 1, 2011 through January 31, 2013, the selected Federal agencies and uniformed service implemented certain procedures to communicate the availability of the TSP Roth option and how it can be incorporated into retirement planning to their respective employees and service members. As a result of our compliance testing, we did not identify any instances of noncompliance with the TSP Bulletin 10-13, Section VI.C at the selected Federal agencies or TSP Bulletin 11-U-4, Section VI.C at the selected uniformed service. Our engagement communicates no recommendations.

This performance audit did not constitute an audit of the financial statements of the TSP, the selected Federal agencies, or the selected uniformed service in accordance with *Government Auditing Standards*. KPMG was not engaged to, and did not render an opinion on the selected Federal agencies' or uniformed service'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 LLP

September 30, 2013

I. BACKGROUND OF THE TSP AND TSP ROTH OPTION

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 March 31, 2013, had approximately \$346 billion in assets and approximately 4.6 million participants¹.

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 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. Overview of the TSP Roth Option²,³

The Thrift Savings Plan Enhancement Act of 2009, Public Law 111-31, signed into law on June 22, 2009, authorized the TSP to add a Roth 401(k) feature to the plan. This benefit allows participants to contribute on an after-tax basis to their TSP accounts and receive tax-free earnings when they withdraw the funds, assuming certain criteria are met.

Exhibit I-1 presents a comparison of traditional (pre-tax) and Roth (after-tax) TSP contributions:

¹ Source: Minutes of the April 22, 2013 Federal Retirement Thrift Investment Board meeting, posted on www.frtib.gov.

² Source: TSP Bulletin 10-13, *Implementation of Roth Thrift Savings Plan Contributions*, December 2010

³ Source: TSP Bulletin 11-4-U, Implementation of Roth Thrift Savings Plan Contributions, January 2011

Comparison of Traditional and Roth TSP Contributions

The Treatment of	Traditional TSP	Roth TSP	
Contributions	Pre-tax	After-tax ⁴	
Your Paycheck	Taxes are deferred, so less	Taxes are paid up front, so	
	money is taken out of the	more money comes out of the	
	participant's paycheck	participant's paycheck	
Transfers In	Transfers allowed from	Transfers allowed from Roth	
	eligible employer plans and	401(k)s, Roth 403(b)s, and	
	traditional individual	Roth 457(b)s	
	retirement accounts (IRAs)		
Transfers Out	<i>Transfers</i> allowed to eligible	Transfers allowed to Roth	
	employer plans, traditional	401(k)s, Roth 403(b)s, Roth	
	IRAs, and Roth IRAs ⁵	457(b)s, and Roth IRAs ⁶	
Withdrawals	Taxable when withdrawn	<i>Tax-free</i> earnings if five years	
		have passed since January 1 of	
		the year the participant made	
		his/her first Roth contribution,	
		AND the participant is age 59	
		½ or older, permanently	
		disabled or deceased.	

Source: Thrift Savings Plan Highlights, January/February 2012.

Beginning the first full pay period in January 2012, or as soon as possible thereafter, Federal agencies and uniformed services were to offer Federal employees (FERS and Civil Service Retirement System (CSRS)) and uniformed services members, respectively, the opportunity to make TSP Roth contributions. Thus, the agencies and services were to:

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⁴ Roth contributions are subject to Federal (and, where applicable, state and local) income taxes, while traditional contributions are not taxed until withdrawn. However, both Roth contributions and traditional contributions are included in the amount of wages used to calculate payroll taxes (e.g., Social Security taxes).

⁵ The participant would have to pay taxes on any pre-tax amount transferred to a Roth IRA.

⁶ Transfers to a Roth IRA from a Roth TSP account are not subject to the income restrictions that apply to Roth IRA contributions.

- Modify their electronic TSP enrollment programs or other front-end applications to add Roth contribution elections from basic pay. Participants were to be able to elect one, the other, or both types of contributions.
- Modify their payroll systems to allow for regular and Roth contributions (including Roth catch-up contributions).
- Provide information to their employees regarding the availability of the Roth feature and how it can be incorporated into their retirement planning.

Exhibit I-2 presents total TSP participants, total TSP Roth option participants, and the percentage of TSP Roth participants compared to total TSP participants from October 2012 through April 2013.

Exhibit I-2 (unaudited)

Month	October 2012	November 2012	December 2012	January 2013	February 2013	March 2013	April 2013
Total TSP Participants	4,602,677	4,608,422	4,614,274	4,616,727	4,619,546	4,619,478	4,616,468
Total TSP Roth Participants	62,984	73,041	101,000	127,682	147,303	169,917	188,221
% of TSP Roth Participants to Total TSP Participants	1.37%	1.58%	2.19%	2.77%	3.19%	3.68%	4.08%

Source: Minutes of the November 2012 through May 2013 Federal Retirement Thrift Investment Board meetings, Thrift Savings Fund Statistics.

II. OBJECTIVE, SCOPE AND METHODOLOGY

A. Objective

The U.S. Department of Labor (DOL), Employee Benefits Security Administration (EBSA) engaged KPMG LLP (KPMG) to conduct a performance audit of Thrift Savings Plan (TSP) Roth option communications at selected Federal agencies and uniformed services.

The objectives of our audit over TSP Roth option communications were to:

- Determine if the selected Federal agencies and uniformed services implemented procedures to
 address the requirements of TSP Bulletin 10-13, Implementation of Roth Thrift Savings Plan
 Contributions, or TSP Bulletin 11-U-4, Implementation of Roth Thrift Savings Plan
 Contributions, respectively, related to providing information to their employees and service
 members regarding the availability of the TSP Roth option and how it can be incorporated
 into their retirement planning; and
- Test compliance with TSP Bulletin 10-13, Section VI.C at the selected Federal agencies or TSP Bulletin 11-U-4, Section VI.C at the selected uniformed services, which requires agencies and services to provide information to their employees and service members regarding the availability of the TSP Roth option and how it can be incorporated into their retirement planning.

B. Scope and Methodology

We conducted this performance audit in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States using EBSA's *Thrift Savings Plan Fiduciary Oversight Program*. Our scope period for testing was January 1, 2011 through January 31, 2013. We performed the audit in four phases: (1) planning, (2) arranging for the engagement with the selected Federal agencies and uniformed service, (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 associated with the processes and personnel involved with communications of the TSP Roth option. Our planning phase also included selecting a non-statistical sample of Federal agencies and uniformed services at which to perform our testing; because we did not statistically select our sample, our results are applicable to the sample we tested and were not

extrapolated to the population. Arranging the engagement included contacting the Federal agencies and uniformed service selected and agreeing on the timing of detailed testing procedures.

During the testing and interviewing phase, we performed the following procedures to achieve our audit objectives:

- Conducted interviews with employees of the selected Federal agencies and uniformed service; and
- Collected and inspected auditee-provided documentation and evidence, such as training materials, on-boarding documents, and internal memoranda communicating information about the TSP Roth option.

We conducted these test procedures primarily at the Federal agencies' and uniformed service's headquarters in Washington, DC. In Appendix B, we identify the key documentation provided by Agency, Federal agencies, and uniformed service personnel that we reviewed during our performance audit.

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

A. Introduction

We performed procedures related to communications about the Thrift Savings Plan (TSP) Roth option while conducting a performance audit at a sample of Federal agencies and uniformed services. Our scope period for testing was January 1, 2011 through January 31, 2013. This performance audit consisted of reviewing and testing applicable policies and procedures, which included interviewing key personnel and reviewing key reports and documentation (Appendix B) at the following agencies and service:

- Department of Agriculture
- Department of Defense, United States Army
- Department of Health and Human Services
- Department of Homeland Security, United States Coast Guard
- Department of Justice
- Department of Transportation
- Department of the Treasury
- Department of Veterans Affairs
- The National Aeronautics and Space Administration

Based upon the performance audit procedures conducted and the results obtained, as summarized in Section III.B, we met our audit objective. We conclude that for the period January 1, 2011 through January 31, 2013, the selected Federal agencies and uniformed service implemented certain procedures to communicate the availability of the TSP Roth option and how it can be incorporated into retirement planning to their respective employees and service members. As a result of our audit procedures, we did not identify any instances of noncompliance with TSP Bulletin 10-13, Section VI.C at the selected Federal agencies or TSP Bulletin 11-U-4, Section VI.C at the selected uniformed service.

We noted no prior recommendations. The current engagement produced no new recommendations.

B. Summary of Questionnaire Results

As part of our audit procedures, we developed a questionnaire to enable us to make consistent inquiries at each of the selected Federal agencies and uniformed service related to obtaining and communicating information about the TSP Roth option. Because we did not statistically select our sample of Federal agencies and uniformed services, our results are applicable to the sample we tested and were not extrapolated to the population. The table below summarizes the results:

Area of Inquiry	Results		
An appropriate individual within the organization is responsible for communicating new benefit options to employees / service members.	100% of agencies/service selected have individual(s) responsible for communicating new benefit options.		
The organization received timely notification of the TSP Roth option.	100% of agencies/service selected reported receiving timely notification of the TSP Roth option.		
Personnel obtained and read TSP Bulletin 10-13 / 11-U-4 and any subsequent applicable bulletins.	100% of agencies/service selected obtained and read TSP Bulletin 10-13 / 11-U-4 and subsequent applicable bulletins.		
The organization received other materials from the Federal Thrift Investment Board's Staff (Agency) in a timely manner to gain understanding of the TSP Roth option.	67% of agencies/service selected noted the receipt of other materials, such as pamphlets and fliers, to gain an understanding of the TSP Roth option. Of these agencies, 83% reported that these other materials obtained were timely.		
Personnel attended Agency-sponsored training that included TSP Roth option information.	78% of agencies/service selected attended Agency-sponsored training or information sessions that included TSP Roth option information.		
Personnel understood their respective organization's responsibilities related to the TSP Roth option.	100% of agencies/service selected understood their organization's responsibilities related to the TSP Roth option.		

Area of Inquiry	Results
The organization's electronic TSP enrollment program was modified timely for the TSP Roth option.	100% of agencies/service selected reported that their electronic TSP enrollment programs were modified. 56% of agencies/service selected reported that their electronic TSP enrollment programs were modified in the month of the TSP-required release date (May 2012), and 44% of agencies/service selected reported that their electronic TSP enrollment programs were modified after the month designated by the TSP.
New hire training and on-boarding packages have been updated to include information regarding the TSP Roth option.	100% of agencies/service selected have updated their new hire training and on-boarding packages to include information regarding the TSP Roth option.
The organization notified existing employees / service members of the TSP Roth option.	100% of agencies/service selected have notified existing employees / service members of the TSP Roth option.
The organization established periodic communications to provide information to employees / service members regarding the TSP, including the Roth option.	100% of agencies/service selected have established annual communications to provide information to employees / service members regarding the TSP, including the Roth option. 78% of agencies/service selected have established more frequent communications to provide information to employees / service members regarding the TSP, including the Roth option, throughout the year and on an as needed basis.
The organization compiled and reviewed statistics or reports which identify how many employees / service members have elected the TSP Roth option.	11% of agencies/service selected compiled and reviewed statistics or reports which identify how many service members have elected the TSP Roth option.





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

September 30, 2013

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

Dear lan:

This is in response to KPMG's email on September 13, 2013, transmitting the KPMG LLP report entitled Employee Benefits Security Administration Performance Audit of the Roth Option Communications at Selected Federal Agencies and Uniformed Services dated September XX, 2013. We have no comments with respect to this report.

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 that is developed as a result of your reviews are useful to the continued improvement of the Thrift Savings Plan.

Very truly yours

Gregory T. Long

Enclosure

KEY DOCUMENTATION AND REPORTS REVIEWED

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

- Thrift Savings Plan (TSP) Bulletin 10-13 (11-U-4 for Uniformed Services), *Implementation of Roth Thrift Savings Plan Contributions*
- TSP Bulletin 12-9 (12-U-8 for Uniformed Services), *Implementation Date for Roth Thrift Savings Plan Contributions*
- Summary of the Thrift Savings Plan, published as of May 2012
- Fund Information Sheets for the G, F, C, S, I and L Funds, as of December 31, 2012
- Roth TSP Overview for Agency/Service Representatives Presentation slide deck
- TSP Managing Your Account, published as of May 2012
- TSP Highlights, published in January/February 2012
- TSP Highlights, published in April 2012
- TSP Highlights, published in June 2012
- TSP Highlights, published in July 2012

The National Aeronautics and Space Administration (NASA) Documents and Reports:

- Memo from NASA Shared Services Center (NSSC) titled, Implementation of Roth Thrift Savings Plan (TSP) Contributions, sent April 2012
- Memo from NSSC titled, Implementation of Roth Thrift Savings Plan (TSP) Contributions, sent May 2012
- NSSC's on-boarding caseworker documents as of January 31, 2013 provided to new employees
- Personnel Bulletin: 2006-46-CI, Workforce Transformation Tracking System (WTTS) and Homeland Security Presidential Directive -12 (HSPD-12): Mandatory Action - January 1, 2007, sent November 2006

Department of the Treasury (Treasury) Documents and Reports:

- Memo from Human Resources Specialist to all employees regarding the TSP Roth option, dated January 9, 2013
- Memo from Human Resources Specialist to all Benefits Officers regarding the Roth TSP updates, dated May 11, 2012
- Memo from the National Finance Center regarding the Roth TSP implementation, dated May 4, 2012
- Screenshot of Treasury's Employee Personal Page
- Memo from Lead Benefits Specialist to all employees at the Bureau of Engraving and Printing regarding the TSP Roth implementation, no date listed
- Memo from Human Resources Specialist to all Benefits Officers regarding the Roth TSP overview class, dated May 11, 2012
- Articles published on the Internal Revenue Service (IRS) intranet regarding the Roth TSP, various dates

Department of Veterans Affairs (VA) Documents and Reports:

- Memo from Director of Human Resources, Erie VA Medical Center, to all Erie VA Medical employees announcing the Roth TSP option, dated March 21, 2012
- Memo from Director of Human Resources, Erie VA Medical Center, to all Erie VA Medical employees regarding updates for the Roth TSP option, dated August 2, 2012
- On-boarding PowerPoint slides, as of January 31, 2013, that includes the TSP Roth option
- Dallas VA Medical Center slides regarding a presentation on the TSP program that includes information on the TSP Roth option
- Memo from the VA Office of Human Resources to Human Resources Managers regarding the Roth option, dated March 20, 2012
- Memo from the VA Human Resources Information Services to Defense Finance and Accounting Service (DFAS) payroll servicing, dated August 1, 2012

Department of Justice (DOJ) Documents and Reports:

- Memo from Human Resources Benefit Specialist to other Human Resources Benefit Specialists regarding the April 11, 2012 TSP Coordinators meeting, sent on April 12, 2012
- Justice Consolidated Office Network (JCON) broadcast messages (DOJ's intranet) sent to all employees regarding the TSP Roth feature, various dates
- Memo to all U.S. Trustee Program personnel regarding the release of the TSP Roth feature, sent on April 12, 2012
- Article titled, *Wayne McLeod: The Life and Death of a Mini-Madoff*, published on September 2, 2010 regarding the law enforcement financial advisor scandal
- Memo to all Federal Bureau of Investigation (FBI) personnel regarding the updates to the TSP Roth option, sent on November 9, 2012
- Employee eBriefs sent to all FBI personnel containing information on the TSP Roth feature, various dates

Department of Health and Human Services (HHS) Documents and Reports:

- Memo from HHS News to all HHS employees regarding the announcement of the TSP Roth feature, sent on February 24, 2012
- Memo from HHS News to all HHS employees regarding the DFAS implementation of the TSP Roth feature, sent on July 13, 2012
- HHS on-boarding PowerPoint slides containing TSP Roth information, as of January 31, 2013
- Memo from HHS News to all HHS employees regarding informational updates on the TSP Roth feature, sent on October 15, 2012
- Memo from HHS Benefits Officer to all component Benefit Coordinators regarding the TSP Roth Training Session, sent on May 11, 2012
- Memo from Human Resources Assistant (Benefits) at HHS Indian Health Services sent to all Indian Health Service, Northern Plans Region employees regarding the TSP Roth feature, sent on December 11, 2012

Department of Transportation (DOT) Documents and Reports:

- Memo from Compensation and Benefits Program Manager to component Benefit Specialists regarding TSP Roth training, sent on May 21, 2012
- Memo from Benefits and Entitlements Team to the Office of Secretary of Transportation employees regarding informational updates on the TSP Roth feature, sent on May 4, 2012
- Memo from Human Resources Specialist, Benefits Officer at Federal Highway Administration to all Federal Highway Administration staff regarding the announcement of the TSP Roth feature, sent on February 9, 2012
- Department of Transportation TSP training PowerPoint slides updated with TSP Roth information, as of January 31, 2013
- Federal Aviation Administration (FAA) intranet broadcast messages sent to all FAA employees regarding the TSP Roth feature, various dates

Department of Homeland Security, U.S. Coast Guard Documents and Reports:

- Memo from the Office of Civilian Human Resources to Department of Homeland Security Benefits Officers regarding TSP Roth training, sent on May 10, 2012
- Screenshot of the U.S. Coast Guard's Employee Personal Page on May 1, 2013
- ALCOAST message to all U.S. Coast Guard employees announcing the TSP Roth option, sent May 2012
- Flag Voice message to all U.S. Coast Guard employees announcing the TSP Roth option, sent May 2012
- ALCOAST CIV message to all U.S. Coast Guard employees announcing the TSP Roth option, sent May 2012
- Screenshot of the U.S. Coast Guard website with TSP Roth information and the Flag Voice posting announcing the TSP Roth option on May 17, 2012

Department of the Army Documents and Reports:

- Department of Defense (DOD) Compensation Chiefs meeting agenda from April 19, 2012
- DOD Roth TSP Feature Communication Plan drafted on April 30, 2012

- Screenshot of the DFAS website that announces the TSP Roth implementation modified on September 28, 2012
- Screenshot of the Army Financial Readiness Program homepage taken on May 8, 2013
- Screenshot of web article on the DOD OneSource website titled, *Financial Planning in Your Twenties and Thirties*, taken on April 19, 2013
- Screenshot of web article by Financial Readiness Program Manager on the DOD OneSource website titled, *Hop on the Financial Fitness Train*, taken on April 19, 2013
- Screenshot of the DOD Financial Readiness Campaign website taken on April 19, 2013
- Screenshot of the MyArmyBenefits website that describes the TSP Roth feature, updated on December 26, 2012
- Screenshot of the Fort Carson Army Community Service Center (ACS) Financial Readiness webpage taken on April 19, 2013
- TSP Participation Report for the Army, as of January 2013
- Memo regarding the G-1 Army Benefits webpage updates to include updated information on the TSP Roth feature, sent on December 12, 2012
- Screenshot of the Fort Bragg ACS Financial Readiness webpage, taken on April 19, 2013
- Fort Bragg ACS Action Plan Reference Materials for the TSP that include information on the TSP Roth feature
- Screenshot of the Fort Sill ACS Financial Readiness webpage, taken on April 19, 2013
- Fort Sill ACS Financial Readiness Training Thrift Savings Plan class lesson plan materials
- Fort Sill ACS Financial Readiness Training Thrift Savings Plan PowerPoint class slides
- Fort Hamilton ACS Financial Readiness Program flyer advertising financial readiness classes offered in March 2013
- Fort Hood ACS Financial Readiness Training-Personal Financial Management Training for First Termers class lesson plan materials
- Fort Hood ACS Financial Readiness Training-Savings and Investment class lesson plan materials

- Fort Hood Defense Military Pay Office newsletter for September 2012
- Fort Hood Soldier and Family Assistance Center Financial In-Processing Checklist Thrift Savings Plan materials updated as of the TSP Roth release date

Department of Agriculture (USDA) Documents and Reports:

- Memo from Senior Specialist sent to USDA component Benefits Specialists regarding notes from the 3rd Quarter TSP meeting on September 11, 2011
- Memo from USDA Office of Inspector General (OIG) to all OIG personnel announcing a new informational course for the TSP program including the Roth option, sent on July 13, 2013
- Memo sent to all new employees joining the USDA regarding the automatic enrollment into the TSP program that contains information on the TSP Roth feature on August 3, 2012
- Screenshot of the USDA's Employee Personal Page on May 14, 2012
- Human Resources Newsletter sent to all USDA employees with information on the TSP Roth program, sent on April 15, 2012
- Memo from Senior Human Resources Specialist to USDA component Benefits Specialists regarding the Office of Personnel Management's Retirement Readiness Now tips, including information on the TSP Roth option, sent on April 17, 2012
- Memo from Human Resources Supervisory Specialist to Forest Service Benefits Specialists regarding information on the TSP Roth feature, not dated
- Memo to Bureau of Public Debt (BPD) Benefits Specialists asking them to share with their respective agency or agency component personnel for which BPD is contracted with to administer HR related services the attached article on the TSP program, including TSP Roth information
- Memo from Benefits Officer regarding information to share with all Merit Systems Protection Board personnel, sent on May 1, 2012