Telework Program

Final Report

of the

Montgomery County Public Schools

Report # OIG-19-004

May 22, 2019

Montgomery County, Maryland
Office of the Inspector General

Telework Program
of the
Montgomery County Public Schools

May 22, 2019

Background

Montgomery County Public Schools (MCPS) had 254 employees approved for telework in 2018. The telework program includes a small number of consulting teachers but does not primarily include the academic workforce. The program was implemented in 2006.

Why We Did This Audit

The Montgomery County Office of the Inspector General sought to assist MCPS in assessing its current telework program.

What We Found

- MCPS appears to capture some benefits from the current telework program, but not all potential benefits;
- MCPS has implemented 10 key controls that we evaluated but needs improvement in 2 of the controls;
- MCPS does not have written policies (a) prohibiting the copying of certain data onto employees' personally owned computers and (b) requiring employees to inform MCPS technology management if any equipment with MCPS data is lost or stolen; and
- MCPS' written guidelines for telework approval decisions may not be sufficiently clear to employees and supervisors, and the implementation appears to be inconsistent.

What We Recommend

- MCPS should explore the possibility of expanding its telework program beyond the positions currently covered to capture additional benefits such as reduced real estate costs and the ability to continue operations in severe weather, subject to labor agreements;
- In its training for supervisors of teleworkers, MCPS should include guidance on monitoring teleworkers and measuring their long-term performance, including establishing objectives, setting deadlines, and requiring status reports;
- MCPS should update its written policies so that they a) prohibit copying certain data onto employees' personally owned computers or other personal devices and b) require employees to inform MCPS if equipment with MCPS data is lost; and
- MCPS management should communicate in writing to decision-makers and employees its criteria for approving telework and determining the number of days that an employee may telework, and it should monitor the decisions system-wide to ensure that the decisions are equitable.

Table of Contents

Telework Program
of the Montgomery County Public Schools

Introduction and Background

Montgomery County Public Schools (MCPS) defines teleworking as "the practice of working from a remote work place, such as home or an approved alternate location, instead of commuting to a designated office."[1] MCPS instituted its telework program in 2006 after the Montgomery County Council encouraged County agencies to provide teleworking opportunities for their employees. The County did not roll out its own telework program until June of 2017.

MCPS supports teleworking to increase employee productivity, reduce the amount of time employees spend commuting to and from work, ease traffic congestion, reduce the environmental impact of car emissions, and promote a balance between home and work. MCPS' teleworking employees work in administrative areas such as information technology and accounting.

This performance audit was approved by the Montgomery County Board of Education on February 13, 2018. We conducted this audit in accordance with *Government Auditing Standards* issued by the U.S. Government Accountability Office. Information about our Objectives, Scope, and Methodology is in Appendix B.

Who Teleworks at MCPS?

Telework approvals at MCPS involve a two-part approval process: both the position and the employee require approval. According to MCPS, there were 280 MCPS employees whose positions were approved for telework in 2018; however, 254 employees were approved, which represents 1.1% of MCPS' 23,502 employees. The teleworkers are not primarily the academic workforce; however, they do represent a sizable number of staff members. The following chart shows the positions with the most total telework hours reported.

---

[1] Regulation GEH-RA.

Positions that Telework the Most (1/17 – 3/18)	Hours	Employees	Hours/ Employee
Teacher, Consulting	4879	37	132
IT Systems Specialist	4571	15	305
IT Systems Engineer	2954	8	369
Commnctn Spec/Web Producer	2351	6	392
Application Developer II	2103	9	234
Application Developer III	2090	6	348
Technical Analyst	1813	2	906
Data Integration Spec	1550	3	517
Psychologist	1458	42	35
Instructional Spec	1436	17	84
Coord GIS Services	1301	1	1301
Fiscal Specialist	1218	1	1218
Accountant	1089	3	363

Source: MCPS data for Jan. 2017 – Mar. 2018

The position at MCPS that records the most telework hours is Consulting Teacher. Thirty-seven of MCPS' teleworkers are consulting teachers. Consulting teachers assist two kinds of MCPS teachers: new teachers and those teachers who have been identified as below standard or underperforming. They observe these teachers in the classroom and provide feedback. They write reports while teleworking.

Board of Education members are also teleworkers, as a Board member pointed out: they do most of their individual work via telework on phones, laptops, and other computers.

Classroom teachers make up 57% of MCPS employees. Teachers at MCPS have professional days, usually at the end of grading periods, for grading, planning and other activities. Teachers may work from home on these days. The contract between MCPS and the Montgomery County Education Association, the union representing teachers, refers to teachers teleworking on professional days. However, regular classroom teachers do not submit time records showing telework hours and are not included in MCPS' formal teleworker count.

We are aware that MCPS has made significant investments in technology infrastructure such as Chromebooks for its students that might enable the system to explore remote learning opportunities[2]. Since it was not our intent to discuss academic issues, we did not explore

---

[2] "South Carolina School District Just Abolished Snow Days – and Will Make Students Learn Online", *Washington Post*, July 30, 2018 https://www.washingtonpost.com/news/education/wp/2018/07/30/a-south-carolina-school-district-just-abolished-snow-days-and-will-make-students-learn-online/?noredirect=on&utm_term=.a4b1e8e60248 ; and "How a School District Did Away with Snow Days", *Route Fifty* March 20, 2019 at https://www.routefifty.com/tech-data/2019/03/school-district-snow-days/155706/, both last accessed March 26, 2019.

whether MCPS has any such programs. This report focuses on MCPS' formal telework program covering those employees described above.

Findings & Recommendations

Our review identified four Findings and makes four Recommendations.

Finding 1: MCPS appears to capture some benefits from the current telework program, but not all potential benefits.

MCPS Regulation GEH-RA identifies the benefits of teleworking as increasing employee productivity, reducing the amount of time employees spend commuting to and from work, easing traffic congestion, reducing the environmental impact of car emissions, and promoting a balance between home and work.

In addition to specific data regarding telework hours and frequency reported by MCPS employees, we requested from MCPS any reports they might already have on telework at MCPS, but nothing was provided in response to this request. MCPS provided us with a significant amount of data related to hours spent teleworking. We did not find that data useful in our analysis of either the benefits identified in the regulation or of other potential benefits but did find this data useful for understanding the telework program and identifying potential interviewees.

There are other potential benefits of telework that are not identified in the MCPS regulation. For example, some telework programs in government agencies and private companies have led to reduced real estate costs and associated energy costs. However, when teleworkers are only teleworking for part of their work weeks, which is typically the case at MCPS, they still require office space for the time they are not teleworking. If the teleworkers are in the office on the same days, which is what happens at MCPS on meeting days, then alternating the use of an office is not always a possibility.

In addition, telework can enable agencies to function when weather conditions cause offices to close. Federal government employees approved for telework are expected to telework when offices are closed due to weather conditions, as long as the employee could reasonably anticipate the severe weather and the approved telework site is safe. This is not the case at MCPS: when MCPS schools and offices are closed, only emergency personnel designated by the

superintendent report for work [3]. When schools are closed, but the administrative offices are open, MCPS employees may choose to use unscheduled telework instead of reporting to work as scheduled. Procedures during severe weather conditions are a subject of MCPS employee union contracts.

Although we had envisioned interviewing a broader sample of teleworkers and their supervisors, we ultimately interviewed five MCPS teleworkers and two supervisors. We focused on employees in jobs with the most telework hours total, employees in jobs with the most telework hours per person, and the supervisors who managed them.

Increasing Employee Productivity

All the teleworkers we interviewed said that teleworking enabled them to be more productive. For example, more than one respondent identified fewer interruptions, a quieter workspace making it easier to hear and focus, and a more flexible, less hectic environment.

Some teleworkers expressed that there were no downsides to telework. However, others, who had limited social interactions in their work, expressed that they would not want to telework every day, because that would lead them to feel isolated from the workplace.

Both employees and supervisors told us that employees who telework are treated and rated the same way as are those employees who do not telework. An interviewee said, "The biggest challenge is to demystify the idea that someone is not productive if not seen."

One concern expressed by MCPS management is how to determine whether teleworkers are working. This question alone suggests a skepticism about telework. We did not have access to enough interviews and data to allow us to analyze the productivity question thoroughly, but we did explore it in the interviews we did.

An inability to observe workers working was not an issue for the two supervisors we interviewed. Both of them found telework to be beneficial to employee productivity and were comfortable managing teleworkers. One MCPS supervisor stated, "You don't have to sit in front of me and type." These supervisors set objectives and deadlines, review status reports, and monitor if the work is produced, if deadlines are met, and if the employee is quickly responsive to calls and emails. Our interviews with teleworkers confirmed this.

However, two of the teleworkers we interviewed told us that some supervisors had negative views of telework. One interviewee told us that some supervisors do not monitor well, and that some employees might take advantage of that. This interviewee suggested that supervisor

---

[3] Similarly, Montgomery County government employees are not required to telework when the County government is closed due to weather.

training include tips and possibly a handout on how to monitor teleworkers. The interviewee suggested monitoring activities such as checking time sheets and questioning certain patterns, for example if a teleworker frequently moved telework days to Mondays.

MCPS teleworkers are expected to complete deliverables logs, which list assignments and deliverables. One supervisor said that the logs were a good accountability measure. Another supervisor stated that the logs were most useful for employees who were beginning to telework. Four of the teleworkers we interviewed used them for reporting completed work; only one reported using them for planning. Three teleworkers found them useful, and two did not.

Reduced Commuting Time and Related Environmental Impacts

Almost all the teleworkers we interviewed expressed the importance of reduced commuting time and costs and the positive effects on their productivity. MCPS in 2016 collected "Monthly Telework Evaluation Forms" that included questions about commuting information. MCPS provided copies of 1-page monthly forms for part of 2016, but it was not aggregated. It would be enough to provide a snapshot, and we do not know what MCPS did with this data. An example of one of these forms is in Appendix C. After 2016, MCPS collected telework hours in its timekeeping system.

Promoting a Balance Between Home and Work

Interviewees expressed that people have more balance in their lives as a result of telework. For example, one interviewee stated that there was more time to exercise, and two said they were less stressed.

Recommendation 1

MCPS should explore the possibility of expanding its telework program beyond the positions currently covered to capture additional benefits such as reduced real estate costs and the ability to continue operations in severe weather, subject to labor agreements.

Finding 2: MCPS has implemented 10 key controls that we evaluated but needs improvement in 2 of the controls.

Although the available data and interviews suggest that employees as well as the organization benefit from the program, data provided by MCPS indicates that telework at MCPS declined in every quarter in 2018 compared to the same quarter in 2017.

Number of Employees Teleworking

Quarter	2017	2018
Q1	171	143
Q2	170	122
Q3	119	81
Q4	150	124
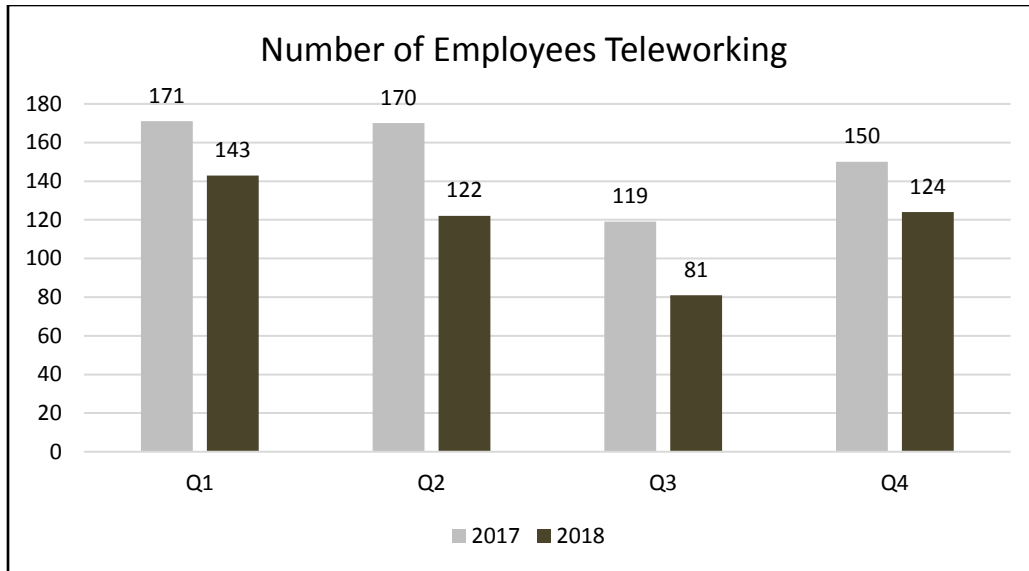
* only two months of data were available for 2018 Q2

The number of hours teleworked also decreased over the same period.

One reason for the decline in the third quarter, which corresponds to the summer months, is that consulting teachers do not telework in the summer, because they are not writing reports then.

When we asked why there was a decline in telework from 2017 to 2018, MCPS management informed us that beginning in the Fall of 2017, which corresponds to the fourth quarter of 2017 in the charts above, MCPS enhanced telework procedures and requirements to promote greater accountability for employees and supervisors. This included a required orientation, a revised telework agreement including employee/supervisor agreed upon telework days and hours, implementation of a deliverables log, highly recommending that supervisors make the telework experience a part of an employee's evaluation, and a mandated safety checklist for the remote worksite.

Key Controls

We identified relevant significant controls over telework by researching recommended practices in the Federal Government, Montgomery County and nearby local governments and the State of Maryland. We also reviewed literature from management consultants and researched telework in other educational institutions. A list of the Federal Government and Maryland reports we reviewed is in Appendix B. From this research, we identified 10 controls that we determined were key controls.

The following chart lists those key controls we identified in our research.

Key Controls	
1)	Supervisors set objectives, deadlines, and reporting requirements
2)	Teleworkers' performance measured same as that of other workers
3)	Written policies
4)	Training required for employees & managers
5)	Remote work site criteria in writing and self-certification required
6)	Mix of telework and office days to meet office needs
7)	Written agreements
8)	Data on telework hours collected
9)	Technology controls in place
10)	Telework approvals based on clear written standards

1) <u>Supervisors set objectives, deadlines, and reporting requirements</u>

The State of Maryland recommends that for non-quantifiable or project-oriented tasks, supervisors of teleworkers 1) establish objectives for the tasks, 2) set deadlines, and 3) require status reports. The MCPS teleworkers' supervisors we interviewed do these regarding the teleworkers they manage.

MCPS' *Administrative and Supervisory Professional Growth System Handbook* ("handbook") specifies how to evaluate the performance of MCPS administrators. It states that supervisors should review performance in relation to standards and goals. Work product reports/ updates are a source of evaluation data. The sections of the handbook regarding central services administrators and business and operations administrators do not specifically discuss establishing task objectives, setting deadlines, or requiring status reports.

MCPS management provides supervisors of teleworkers a form log titled "Weekly Telework Log: Assignments/Deliverables." The log presents a single column for Assignments/Deliverables but column does not provide for both objectives (or assignments) and accomplishments (or deliverables) and the example provided in the telework orientation materials implies only that the column should contain a report of the work completed on a daily basis. Further, the log only addresses one week at a time. There is no provision for deadlines, or project status. It is merely an activity report for telework days. In addition, it is unclear, how the telework activities would mesh with the activities that would be performed during non-telework periods, since MCPS teleworkers are required to combine telework with periods of non-telework. Accordingly, these logs are neither complete in capturing employee performance during periods of telework, nor comprehensive in capturing an employee's overall performance including non-telework periods.

MCPS teleworkers are expected to complete the logs. One supervisor said that the logs were a good accountability measure. The other supervisor we interviewed stated that the logs were not

useful except for employees who were beginning to telework and employees who did not otherwise have performance targets. Of the five teleworkers we interviewed, only one found the deliverables logs useful, two stated they did not, and two did not use the logs. The teleworkers who did not use them instead chose to use shared electronic calendars and electronic folders to plan work and record the work that was done.

2) <u>Teleworkers' performance measured the same as that of other workers</u>

The MCPS form telework agreement states, "The evaluation of an employee's job performance while teleworking shall be based upon current MCPS performance expectations and standards." The State of Maryland and other employers, including a local school system state that employers should treat teleworkers and non-teleworkers the same with regard to performance management.

All the MCPS teleworkers we interviewed stated that they were evaluated fairly and accurately, or that they did not think that the fact that they were teleworking affected their performance reviews. Both supervisors we interviewed stated that they evaluate their employees who telework based on the work they produce, and that they evaluate all their employees this way.

Despite the positive opinions of the individuals we interviewed, there was some concern expressed about the skeptical attitude of some others regarding the productivity of teleworkers. Given those concerns and the limits of the current log as discussed above, it would be useful for MCPS to establish overall performance management systems that better incorporate telework and include monitoring teleworkers and managing long-term teleworker performance in its telework training for supervisors.

3) <u>Written policies</u>

Clear written policies should be provided to employees indicating expectations during work hours, such as arrangements for separate dependent care, being available for meetings and communicating with other staff, and reporting to the employer when the employee is taking sick leave.

MCPS' policies are in the form of regulations and the telework agreement. They address the above topics, as well as technology requirements. MCPS instructs employees on basic network security in its telework training materials.

4) <u>Training required for employees & managers</u>

Telework training can make a telework program successful by providing employees and managers with guidance on using technology, using performance management systems, and communicating with remote colleagues.

MCPS requires employees and managers to receive telework training. Every teleworker we interviewed for whom the training requirement applied told us that the MCPS training provided the information they needed. Both supervisors we interviewed shared this view. One teleworker we interviewed told us that training and other procedures had improved, leading to less ambiguity and more consistency.

5) <u>Remote work site criteria in writing and self-certification required before teleworking</u>

The U.S. Office of Personnel Management (OPM) recommends that teleworkers be provided a self-certification safety checklist for use as a guide when preparing a location for telework. OPM states that managers should review safety checklists with teleworkers to ensure compliance with workplace safety guidelines.

MCPS has clear written criteria for remote workplaces in its Telework Agreement, which includes a checklist addressing temperature, ventilation, lighting, noise, the condition of electrical equipment and systems, obstructions, cord storage, asbestos, combustibles, the condition of flooring and carpeting, furniture, storage, and the posting of MCPS contact information. In the MCPS Telework Agreement, employees must indicate whether their remote workplaces meet the requirements listed.

6) <u>Mix of telework and office days to meet office needs</u>

The State of Maryland states that it can be beneficial for teleworkers to spend at least part of the workweek in their main offices, to minimize isolation and communication problems, give teleworkers access to equipment and services, facilitate integration of the teleworkers with those in the main office, and ease supervisor adjustment to a new work arrangement. A recent Gallup poll found that the people who worked from home 3 to 4 days per week and worked in the office the rest of the week were more engaged with their work than were the people who always worked in the office or the people who teleworked more.

We are not aware of any MCPS employees teleworking full-time under the current program. The three non-consulting-teacher employees we interviewed usually teleworked on the following days: one teleworked on Wednesdays; one teleworked Mondays, Wednesdays, and Fridays; and one teleworked Tuesdays, Wednesdays, and Thursdays. These MCPS teleworkers told us that they would not want to telework 5 days per week.

7) <u>Written agreements</u>

Written agreements are important for communicating responsibilities and expectations. MCPS Regulation GEH-RA requires that employees should complete new telework agreements annually. The MCPS form written agreement addresses the following topics: Telework hours

and days, Remote Work Location and employee duties, Performance Evaluation, Child/Dependent Care, Tax Implications, Supplies and Equipment, and Safety and Liability.

The teleworkers we interviewed all told us that they have written agreements that are updated or reviewed every year. One person we interviewed said that the agreement process has become more formalized recently than it was a few years ago.

8) <u>Data on telework hours collected</u>

Accurate time reporting supports efforts to assess the costs and benefits of telework programs, and it supports supervision of teleworkers. MCPS has a method for recording teleworked hours in its time reporting system, and it produces reports from the system.

9) <u>Technology controls in place</u>

Technology Controls address the controls over certain equipment and information used in telework, such as computers and access to the employer's network. These are discussed in Finding 3 below.

10) <u>Telework approvals based on clear written standards</u>

MCPS telework approval standards are discussed in Finding 4 below.

Recommendation 2

In its training for supervisors of teleworkers, MCPS should include guidance on monitoring teleworkers and measuring their long-term performance, including establishing objectives, setting deadlines, and requiring status reports.

> **Finding 3: MCPS does not have written policies (a) prohibiting the copying of certain data onto employees' personally owned computers and (b) requiring employees to inform MCPS technology management if any equipment with MCPS data is lost or stolen.**

Technology Controls address the controls over certain equipment and information used in telework, such as computers and access to the employer's network. These controls are important for data security and for teleworkers to be able to work effectively.

MCPS has written technology controls that address technology security and data security, as recommended by the U.S. Government Accountability Office and the Enterprise Information Systems Security Official for the Montgomery County Government.

Three MCPS regulations apply to data security: Regulation GEH-RA addresses telework computer systems, electronic information, and network security, Regulation IGT-RA addresses Computer Systems, and Regulation COG-RA addresses personal mobile devices. In addition to these three regulations, MCPS instructs employees on basic network security in its telework training materials. MCPS also has a Computer Systems Security Procedures Manual.

However, MCPS is missing certain controls that are recommended by the Enterprise Information Systems Security Official for the Montgomery County Government. He stated that there are three particularly important technology controls that should be implemented in a telework program:

First, the County Information Systems Security Official stated that users of sensitive information should be required to use two-factor authentication.

Second, the County Information Systems Security Official stated that the organization should restrict access to data and the ability to download data, depending on the user.

Third, the County Information Systems Security Official stated that there should be written policies on data security, and they should include provisions stating that (a) employees are required to inform the employer if equipment is lost that has employer data on it, and (b) that employees are prohibited from copying certain data onto their personally owned computers.

We interviewed the MCPS Director for the Department of Infrastructure and Operations ("MCPS Director") about the technology controls over the MCPS telework program.

The MCPS Director stated that at MCPS, users of sensitive information are not currently required to use two-factor authentication, but he agrees that it would be a good idea for all MCPS employees, whether they telework or not. The Associate Superintendent informed us that MCPS agrees and hopes to have multi-factor authentication implemented by the end of fiscal year 2020. Given that two factor authentication is only recently being implemented by some federal government agencies, it may be not be realistic to expect MCPS to implement this soon, but we encourage MCPS to take steps towards such implementation.

The MCPS Director stated that data access is restricted by user for all MCPS employees. Cloud access is restricted by permission. MCPS' Information Technology (IT) department has an automatic data connection to MCPS Human Resources, so IT is aware when people leave MCPS and when they change jobs and can change permissions accordingly.

MCPS Regulations do not systematically prohibit MCPS employees from copying certain data onto their personally owned computers or personal devices.

The Computer Systems Security Procedures manual requires that if a "laptop" is lost or stolen, it must be reported to MCPS immediately, and it requires that anyone aware of inappropriate data use or possible security breaches alert their immediate supervisor. However, it does not state a requirement that employees inform MCPS if any equipment with MCPS data is lost or stolen.

Although MCPS Regulations state that employees are responsible for the cost of lost computer equipment if the loss results from employee negligence or abuse, the regulations do not state a requirement to inform MCPS if equipment with MCPS data is lost, and the MCPS Director acknowledged this.

Recommendation 3

MCPS should update its written policies so that they a) prohibit copying certain data onto employees' personally owned computers or other personal devices and b) require employees to inform MCPS if equipment with MCPS data is lost.

Finding 4: MCPS' written guidelines for telework approval decisions may not be sufficiently clear to employees and supervisors, and the implementation appears to be inconsistent.

Evaluating Positions and Employees for Telework

MCPS Regulation GEH-RA and a memorandum to Executive Staff and Directors state that MCPS determines telework eligibility based on the position and the employee.

Neither the regulation nor the memorandum include criteria for determining whether a position is approved for telework.

Regulation GEH-RA and the memorandum list "factors" for identification of employees for telework. Neither Regulation GEH-RA nor the memorandum provide guidance on how to apply the listed factors, which we find not to be sufficiently clear.

For example, one of the teleworkers we interviewed stated that her/his manager said there was a requirement that an employee have a long commute from another state to be able to telework.

We did not find this requirement, but we note that the factor "the off-site job location" is not explained. When we asked for an explanation, MCPS emailed us that the "offsite job location" refers to an evaluation of the site for work suitability, but the documentation does not state this.

The following chart shows the MCPS factors for evaluating employees for telework that we find ambiguous.

MCPS Factor	Lack of Clarity
The employee's history of work performance	How strong an employee's performance must be for the employee to be allowed to telework is unclear.
The nature of the work performed and the work products required	It is unclear if an employee should telework if the work is a mixture of work conducive to telework and work that is not.
The tools necessary to perform the work	It is unclear which tools the employee must provide.
Scheduling issues	The guidance does not explain what constitutes a scheduling issue.
The off-site job location	This could refer to the location's suitability for telework, and it could refer to where it is in relation to the employee's office.

Because the application of the factors appeared ambiguous to us, we requested information on how the factors were to be applied. In response, MCPS did not send a document informing supervisors how to apply the factors; instead MCPS management wrote an individual email to the OIG. For some factors, the email discussed rules that applied once an employee was teleworking, such as the requirement to provide a deliverables log or the requirement to have expenses approved, instead of providing explanations of how the factors were to be evaluated and a decision made about telework approval based on them. The email stated that an employee can only telework with the supervisor's recommendation "based upon a totality of the listed factors," which does not indicate that any particular factors are required or how they are to be balanced against other factors.

The Montgomery County Government's evaluations of positions and employees for telework is more transparent. The County Government's evaluation of positions for telework involves 7 "Yes" or "No" questions such as "Does the position require **daily** use of special facilities or equipment that the organization cannot provide to the Teleworker or is not available at the Remote Work Location?" (emphasis in original). If the answer to any of the questions is "Yes," then the employee is typically not eligible for telework. The County Government's evaluation of employees for telework uses a scoring system, and managers are provided with guidance on interpreting an employee's total score.

One MCPS supervisor and one teleworker told us that it would be helpful for there to be criteria for determining the number of days people could telework. Neither Regulation GEH-RA nor the memorandum provide guidance on how to decide upon the number of days people will telework.

One of the teleworkers we interviewed indicated to us that the approval process is unfair, because some supervisors are biased against telework. Another indicated that a previous supervisor had a negative view of telework and as a result approved fewer telework days.

According to the Office of Inspector General of the U.S. Consumer Product Safety Commission, the lack of well-documented, consistent, and transparent eligibility and approval processes increases the risk that employees will perceive the process as unfair. This may have occurred at MCPS.

Recommendation 4

MCPS management should communicate in writing to decision-makers and employees its criteria for approving telework and determining the number of days that an employee may telework, and it should monitor the decisions system-wide to ensure that the decisions are equitable.

Summary of the Chief Operating Officer's Response

The response from the Montgomery County Public Schools Chief Operating Officer (COO) to the final draft report is included in its entirety in Appendix A.

Appendix A: Chief Operating Officer's Response

MCPS **MONTGOMERY COUNTY PUBLIC SCHOOLS**
www.montgomeryschoolsmd.org
MARYLAND

Malcolm Baldrige
National Quality Award
2010 Award Recipient

May 22, 2019

Mr. Edward L. Blansitt III, Inspector General
Office of the Inspector General
51 Monroe Street, Suite 802
Rockville, Maryland 20850

Dear Mr. Blansitt:

Thank you for conducting a performance audit of the Montgomery County Public Schools (MCPS) telework program. Since the Board of Education authorized the performance audit in February 2018, we have appreciated the chance to collaborate with you to study the telework program and welcome your recommendations for areas to focus on in the future. When the County Council encouraged County agencies, as well as MCPS, in 2006 to provide teleworking opportunities for their employees, MCPS quickly moved to implement a telework program and respond to the County Council's request. Your review will help us refine our efforts to meet the County Council's goals in promoting telework opportunities for employees.

We appreciate the potential benefits of teleworking that you noted in your report and were encouraged by the responses from employees who indicated that teleworking enables them to be more productive. We also appreciate your review of best practices when implementing key controls of the telework program and were pleased that the audit confirmed we already have strong controls in place. We are committed to ongoing and continuous improvement and will work to enhance these controls in our program going forward, utilizing practices you highlighted in the report. We particularly are interested in opportunities to strengthen our training of both employees and supervisors for teleworking, as well as enhancing technology controls that focus on data security.

Again, thank you for conducting this performance audit of the MCPS telework program. We look forward to the continued collaboration in this area in the future.

Sincerely,

Andrew Zuckerman, Ed.D.
Chief Operating Officer

AMZ:em

Copy to:
Dr. Smith   Mrs. Dempsey
Mr. Civin   Ms. Diamond
Mr. Cevenini   Ms. Webb

Office of the Chief Operating Officer

850 Hungerford Drive, Room 149 ♦ Rockville, Maryland 20850 ♦ 240-740-3050

Appendix B: Objectives, Scope, and Methodology

The objectives of our audit were to determine if MCPS

1. Has established an effective program that enables MCPS to benefit from teleworking,

2. Has established effective internal controls over the telework program, and

3. Administers its telework program in accordance with applicable law, regulations, and policies.

We identified relevant significant controls over telework by researching recommended practices in the Federal Government, nearby local governments, and the State of Maryland. We also reviewed literature from management consultants.

We considered the following reports from the State of Maryland and the federal government:

- State of Maryland Policy, "Teleworking" revised 5/22/13.

- State of Maryland, "Supervisor's Teleworking Manual" July 2014.

- State of Maryland, "Teleworker's Manual" July 2014.

- U.S. Consumer Product Safety Commission OIG "Audit of Telework Program" 9-29-17.

- U.S. Environmental Protection Agency OIG, "EPA Telework Program is Consistent with U.S. Office of Personnel Management Guidance" 10-16-17.

- U.S. Government Accountability Office, "Federal Telework" Feb. 2017.

- U.S. Government Accountability Office, "VA Telework Impact" 8-7-17.

- U.S. General Services Administration OIG, "GSA's Program for Managing Virtual Employees and Teleworkers Needs Improvement" 10-18-17.

- U.S. Office of Personnel Management, "Status of Telework" in the Fed. Gov., Nov. 2017.

- U.S. Office of Personnel Management, "Guide to Telework in the Federal Government" April 2011.

- Dept. of Homeland Security Directive on Telework, 2013.

We examined the telework regulations, policies, and procedures of MCPS to determine if recommended practices were met.

We researched performance audits of schools' telework programs, but found no specific audits. These programs were briefly addressed in the context of two more general audits, which found a lack of written telework policies and procedures. We contacted the inspectors general offices for the nation's largest school systems or checked their websites and found no reports on school telework programs.

We interviewed five MCPS teleworkers, two supervisors, and one information technology manager. In July of 2018, we requested to interview four teleworkers and four supervisors. Our selection process was based on the telework hours data we received from MCPS. We selected the two positions with the highest numbers of telework hours total (all workers combined) and the two positions with the highest number of hours per worker. For positions with more than two teleworkers, we randomly selected two teleworkers.

Arranging for interviews took many months, and this extended the timeframe for this report. MCPS management raised potential issues with interviews, so we reduced our expectations about how many interviews we could do[4]. In the end, we interviewed 5 teleworkers or former teleworkers (two of whom had the same manager), 2 managers, and an information technology manager.

We also interviewed people in the Montgomery County government with telework management experience and information technology experience.

We analyzed data provided by MCPS. The data that MCPS initially provided covered January 2017 through March 2018. MCPS later provided data from August through December of 2016, but as this data was inconsistent with the other data, we did not include it in our report. We received a data update on February 5, 2019.

We conducted this audit in accordance with *Government Auditing Standards* issued by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

---

[4] In November of 2018 we requested to interview 6 teleworkers and their managers, in addition to an information technology manager. On November 30, 2018, we interviewed 3 teleworkers whom we identified, 2 managers of the teleworkers we identified, and an information technology manager. We interviewed 2 employees chosen by MCPS on January 29, 2019.

Appendix C: Example of Data Collected in 2016

Telework Partnership with Employees
Monthly Telework Evaluation Form

Instructions: The information requested on this form will be used to help the Maryland Department of Transportation (MDOT) to evaluate the effectiveness of the Telework Partnership with Employers' program in reducing traffic congestion and improving air quality.

This form is to be completed on the last workday of each month by teleworkers and submitted to the designated telework coordinator by the 5th of the following month: Telework Coordinator, Email: ████████████@mcpsmd.org
Telework coordinators are responsible for collecting monthly telework evaluation forms from all of their site's teleworkers and submitting them to the TPE contact by the 15th of the following month.

1. Reporting period (month/year): August 2016
2. Name of teleworker: ████████████
3. Name of your employer: Montgomery County Public Schools
4. Location of employer's worksite (city/state): Rockville, MD
5. Number of miles between your home and your employer's worksite (one way): 18
6. How do you usually commute to work on non-telework days:
   __X__ drive alone ____ carpool/vanpool ____ transit (bus or rail) ____ bike/walk
7. Do you normally commute through any of the following corridors on non-telework days (check as many as apply);
   ____ Washington Beltway (495) ____ Baltimore Beltway (695) ____ I-270 ____ I-95 ____ I-83 ____ I-70 __X__ Other

8. Telework Activity for the Current Reporting Period (see example below):

Telework Site	Location (City/State)	No. of Days Teleworked this Reporting Period (only report days in which you work four or more hours from a remote location)	No. Miles from your Home to Telework Site (one way)
Home	████████ MD	4	0
Telework Center			
Satellite Office			
Other (_____)			

EXAMPLE

Telework Site	Location (City/State)	No. of Days Teleworked this Reporting Period	No. Miles from your Home to Telework Site (one way)
Home	Columbia, Maryland	3.5	0
Telework Center	Columbia, Maryland	1.5	10
Satellite Office			
Other (_____)			

If you are aware of fraud or misconduct in County government activities, contact the County Inspector General

📞 Confidential OIG Hotline: 240 777 7644

✉ ig@montgomerycountymd.gov

Edward L. Blansitt III
Inspector General

51 Monroe Street, Suite 802
Rockville, Maryland 20850
240 777 8240
montgomerycountymd.gov/oig