



# OFFICE OF THE INSPECTOR GENERAL

Montgomery County, Maryland



## **MEMORANDUM OF INVESTIGATION**

**TO:** Richard S. Madaleno  
Chief Administrative Officer

**FROM:** Megan Davey Limarzi, Esq.  
Inspector General

**DATE:** April 1, 2025

**SUBJECT:** Investigation of DHHS Employee Travel

The Office of the Inspector General (OIG) recently concluded an investigation based on an anonymous complaint alleging misconduct by a Department of Health and Human Services (DHHS) manager. The complaint alleged that the manager used grant funds that were meant for attending conferences to pay for “personal” trips.

Our investigation did not substantiate the allegation that the manager used grant funds to pay for personal travel. We determined that travel reimbursements the manager received for July 2018 through January 2025 were for conferences that appear to be related to their employment. However, we noted that the Meal and Incidental Expenses Reimbursement Rates (per diem) associated with those conferences were not always properly reduced to account for meals that were included as part of a conference fee, as required by policy.

During the course of our investigation, we also identified several other violations of County policy. We found instances where the manager and other DHHS employees used County purchase cards to pay for hotel stays within the local commuting area, and multiple DHHS employees did not use the eTravel application to record and obtain approval for their non-local travel.

Lastly, we found instances where DHHS managers approved their own travel expenses, a practice that could lead to abuse and fraud. The OIG previously recommended in October 2021 that the County update the Administrative Procedures (AP) regarding employee travel to prohibit County employees from approving their own expenditures. At the time, the County told us that they believed the existing APs adequately communicated a requirement for separation of duties when approving travel. As we again have encountered a problem with employees approving their own travel-related expenses, we continue to believe that County policy needs to be updated.

### **Inquiry and Outcome**

Based on a review of employee reimbursements in the County’s iExpense application, we determined that the DHHS manager has been reimbursed for seven trips since 2019. After analyzing the applicable supporting documentation, we conclude that each of these instances of travel was associated with a conference reasonably related to their position at DHHS.

### *Per Diem Reimbursements*

Administrative Procedure 1-2, *Non-Local Travel Guidelines* (AP 1-2), states that employees are entitled to receive per diem for official travel that is more than 75 miles from the County Executive Office Building in Rockville, Maryland. The per diem rate is based on the United States General Services Administration (GSA) rate for the location and includes allowances for breakfast, lunch, dinner, snacks, as well as related tips and taxes. Per AP 1-2, an employee may not be reimbursed for any meals included as part of a conference fee. The iExpense application provides drop-down menus which automatically calculate per diem rates based on inputs for the dates of travel, travel location, and meals that are marked as being provided to the employee.

Based on a review of conference materials and discussions with event organizers, we determined that two of the conferences the manager attended included meals as part of the conference fee. We reviewed the manager's per diem reimbursements associated with these two events to determine whether the meals provided were properly excluded from reimbursements. For the first conference, it appears the manager was underpaid \$26.39 due to erroneous deductions. For the second conference, we noted meals that were included in the conference fee were not deducted, resulting in the manager being overpaid \$97.50.

### *Hotel Stays in Local Travel Area*

In 2023, the manager attended a conference in Washington, DC. For this two-day conference, located just 17 miles from the Executive Office Building, the County paid \$890.50 for the manager to stay in a hotel for two nights. As this conference was within 75 miles of the Executive Office Building, the manager should not have been entitled to lodging at the County's expense except in "extenuating circumstances, which requires the approval of the department head or designee."<sup>1</sup> According to the DHHS Chief Operating Officer, the manager did not obtain Director approval for the hotel stay. Additionally, the manager's lodging expenses were paid using a DHHS purchase card for which they are the transaction approver, further obscuring the unauthorized expense.

To determine whether the payment of hotel stays for local travel was a common occurrence at DHHS, we reviewed additional purchase card records. We subsequently found DHHS paid \$1,109.22 for seven employees to stay at a hotel in September 2023 while attending a conference in Annapolis, Maryland. AP 1-5 specifically defines Annapolis as being included in the local area for employee travel, thus requiring extenuating circumstances and department head approval for any hotel stay.

According to the DHHS Chief Operating Officer, none of the employees that attended the Annapolis conference obtained approval from the Director. Instead, a DHHS supervisor sent a memorandum to DHHS Manager Two<sup>2</sup> requesting permission for the employees to attend the conference and receive lodging. This individual, along with a management peer, approved the request. Both managers were also listed as attendees in the travel request, meaning they approved

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<sup>1</sup> Administrative Procedure 1-5, *Local Travel Guidelines*

<sup>2</sup> This is not the same manager discussed earlier in this memorandum

their own attendance at the conference and authorized their own hotel stays. Their actions violate AP 1-5 requirements that approvals for hotel stays in the local area be authorized by the department director. Additionally, these expenditures were placed on a department purchase card for which one of the managers is the transaction approver, again further obscuring the violations of policy.

### *eTravel Application*

Since October 2015, the County has publicly shared information on dataMontgomery regarding employee travel. This information includes the destination, purpose, and actual County-funded expenses for employees traveling non-locally for official business. The County uses the eTravel application to capture trip approvals and expenses, and also populate dataMontgomery. While the requirement to use eTravel is not codified in AP 1-2, the County issued guidance requiring all employees who engage in County-funded, non-local travel to document the trip in eTravel. The guidance further states that within two weeks of the completion of approved travel, employees must update eTravel with the actual expenses incurred.

Our investigation revealed that although Manager One was reimbursed for six non-local trips, only one of these trips was documented in the eTravel system. Even then, the eTravel entry associated with this trip was not updated with the actual expenses as required. As a result, the travel expenses associated with this trip were not published on dataMontgomery, which we noted does not reflect any travel for this manager.

To determine if the problem was more widespread, we reviewed travel expenses for other DHHS employees that attended the non-local conference with Manager One. We subsequently found that an additional eleven employees attended the conference, and that a DHHS employee's purchase card was charged \$21,457.82 in transactions related to the conference. None of the trips appeared in dataMontgomery or eTravel.

### **Conclusion and Recommendations**

Our investigation did not substantiate the allegation that the manager used grant funds to pay for personal travel. We did however find that DHHS employees utilized County funds to pay for hotels in the local travel area in violation of County policy. Additionally, we determined County-funded, non-local travel is not always entered into the eTravel system, resulting in a lack of transparency and incomplete data related to employee travel. We recommend that DHHS take appropriate action to address employee violations of policy and recoup identified overpayments as warranted.

No response to this memorandum is requested, but I ask that you provide my office with copies of communications and/or policy updates upon issuance and any documentation showing the recoupment of County funds. Please contact me with any questions, or a member of your staff may contact Deputy Inspector General Frank da Rosa, [Francisco.darosa@montgomerycountymd.gov](mailto:Francisco.darosa@montgomerycountymd.gov), with any questions.

Attachment: County's Chief Administrative Officer's Response

cc: Fariba Kassiri, Deputy Chief Administrative Officer  
Dr. James Bridgers, Director, DHHS

**Attachment:** County's Chief Administrative Officer's Response to OIG MOI

The OIG provided the County's Chief Administrative Officer with a confidential version of this report on March 31, 2025, and received the following response on April 1, 2025.



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich  
*County Executive*

Richard S. Madaleno  
*Chief Administrative Officer*

MEMORANDUM

April 1, 2025

TO: Megan Davey Limarzi, Inspector General

FROM: Fariba Kassiri, Deputy Chief Administrative Officer *FK*

SUBJECT: Confidential OIG Investigation of Health and Human Services Employee Travel

We appreciate your March 31, 2025, Memorandum of Investigation providing the results of the Office of Inspector General investigation concerning the administration of the employee travel expense program within the Department of Health and Human Services (HHS).

We are pleased that the OIG investigation did not substantiate any allegations of the use of grant funds to pay for personal expenses by HHS employees.

We take seriously the issues the investigation identified concerning several instances of apparent noncompliance with County administrative policies concerning local travel. It appears that HHS has already taken several steps to ensure HHS employees better understand the County policies, which will enhance compliance in the future. In addition, the Department of Finance (Finance) has been in process of updating the local and non-local travel administrative procedures, to include observations previously communicated by the OIG.

We will work with management from both HHS and Finance to better understand the details of the specific issues the OIG investigation identified, especially any new issues not already in the process of being addressed, and to determine additional actions that should be taken in response to them.

Thank you for bringing these matters to the attention of HHS management and my office.

cc: Dr. James Bridgers, Director, Department of Health and Human Services  
Mark Hodge, Chief Operating Officer, Department of Health and Human Services  
Michael Coveyou, Director, Department of Finance  
Maxene Bardwell, Internal Audit Manager, Office of the County Executive