

# Inspector General

United States  
Department of Defense



Agreed-Upon Procedures for Reviewing  
the FY 2009 Civilian Payroll Withholding Data  
and Enrollment Information

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## Acronyms and Abbreviations used in the Report and the Attachments

ANG	Air National Guard
APP	Agency Payroll Provider
CSRS	Civil Service Retirement System
DFAS	Defense Finance and Accounting Service
DOE	Department of Energy
VA	Department of Veterans' Affairs
EPA	Environmental Protection Agency
FEGLI	Federal Employees Group Life Insurance
FEHB	Federal Employee Health Benefits
FERS	Federal Employees Retirement System
HHS	Health and Human Services
ODO	Other Defense Organizations
OPF	Official Personnel File
OPM	Office of Personnel Management
RITS	Retirement and Insurance Transfer System



INSPECTOR GENERAL  
DEPARTMENT OF DEFENSE  
400 ARMY NAVY DRIVE  
ARLINGTON, VIRGINIA 22202-4704

September 30, 2009

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Agreed-Upon Procedures for Reviewing the FY 2009 Civilian Payroll Withholding Data and Enrollment Information (Report No. D-2009-120)

We are providing this final report for your information and use.

We appreciate the courtesies extended to the staff. Please direct questions to me at (703) 601-5868 (DSN 329-5868).

*Patricia A. Marsh*  
Patricia A. Marsh, CPA  
Assistant Inspector General  
Defense Business Operations

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# Results in Brief: Agreed-Upon Procedures for Reviewing the FY 2009 Civilian Payroll Withholding Data and Enrollment Information

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## What We Did

Our objective was to perform the Agreed-Upon Procedures (AUPs) detailed in the Office of Management and Budget Bulletin No. 07-04, "Audit Requirements for Federal Financial Statements," August 25, 2008, as amended, to assist the Office of Personnel Management (OPM) in assessing whether Health Benefits, Life Insurance, and Retirement contributions and withholdings, and enrollment information that Defense Finance and Accounting Service (DFAS) submitted to OPM were reasonable and accurate. We assisted them by performing agreed-upon procedures agreed to by the OPM Chief Financial Officer and OPM Inspector General.

We conducted this attestation engagement in accordance with generally accepted government auditing standards, which incorporate financial audit and attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the OPM Chief Financial Officer and Inspector General. Consequently, we make no representation regarding the sufficiency of the procedures either for the purpose for which this report has been requested or for any other purpose.

## What We Found

Of the 408 Official Personnel Files reviewed, we determined that 24 Official Personnel Files had 32 unresolved benefit discrepancies that resulted in 67 total differences reported in the steps of the AUPs. The 67 differences occurred because the documentation was not current and, therefore, did not support DFAS pay and withholding amounts.

In addition, we identified differences in amounts reported to OPM for the Department of Veterans' Affairs Federal Employees Group Life Insurance (FEGLI) Basic coverage that exceeded the five-percent reporting threshold. DFAS is working to resolve this issue.

We also identified a difference in amounts reported to OPM for Other Defense Organizations FEGLI Option C coverage that exceeded the two-percent reporting threshold criteria. This difference was primarily attributable to retroactive adjustments.



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INSPECTOR GENERAL  
DEPARTMENT OF DEFENSE  
400 ARMY NAVY DRIVE  
ARLINGTON, VIRGINIA 22202-4704

September 30, 2009

The Honorable Patrick E. McFarland.  
Inspector General  
U.S. Office of Personnel Management  
Theodore Roosevelt Federal Building  
1900 E Street NW, Room 6400  
Washington, D.C. 20415-0001

Subject: Independent Auditor's Report on Agreed-Upon Procedures for  
Reviewing the FY 2009 Civilian Payroll Withholding Data and  
Enrollment Information

Dear Mr. McFarland:

We performed the procedures described in the Attachment, which were agreed to by the Chief Financial Officer and the Inspector General of the U.S. Office of Personnel Management (OPM). We performed these procedures solely to assist in assessing the reasonableness of the employee withholdings and employer contributions that the Defense Finance and Accounting Service (DFAS) reported on Standard Form 2812, "Report of Withholdings and Contributions for Health Benefits, Life Insurance, and Retirement," for the pay periods ending August 30, 2008; October 25, 2008; November 8, 2008; and February 28, 2009; and reported in the "Supplemental Semiannual Headcount Report," as of September 1, 2008, and March 1, 2009. The reports submitted by DFAS included information for the following entities listed in Appendix A of the Office of Management and Budget Bulletin No. 07-04, "Audit Requirements for Federal Financial Statements," August 25, 2008, as amended: the Department of Defense, Department of Energy (DOE), Department of Health and Human Services (HHS), Department of Veterans' Affairs (VA), and the Environmental Protection Agency (EPA).

By using Audit Command Language software, we randomly selected a sample of 408 employees from the October 25, 2008, pay period from the eight DFAS payroll data files (Army, Navy, Air Force, Other Defense Organizations [ODO], DOE, HHS, VA, and the EPA). We compared the sample of 408 employees' pay and withholdings in the Defense Civilian Pay System to the documentary support in the Official Personnel Files (OPF). Of the 408 OPFs, 204 represented DOD employees, 51 represented DOE employees, 51 represented HHS employees, 51 represented VA employees, and 51 represented EPA employees.

Auditors from the DOE Inspector General performed the agreed-upon procedures that involved reviewing DOE OPFs. Auditors from the HHS Inspector General performed the agreed-upon procedures that involved reviewing HHS OPFs. We reviewed their working papers and determined that we can rely on their work.

We performed the agreed-upon procedures in accordance with generally accepted government auditing standards, which incorporate financial audit and attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the OPM Chief Financial Officer and the OPM Inspector General. Consequently, we make no representation regarding the sufficiency of the procedures either for the purpose for which this report has been requested or for any other purpose.

We were not engaged to express an opinion on whether the Health Benefits, Life Insurance, and Retirement contributions and withholdings, and enrollment information submitted by DFAS to OPM, are reasonable and accurate. Accordingly, we did not conduct an examination nor do we express such an opinion. Had we performed additional procedures, other matters might have come to our attention that we would have reported to you. We provided a draft of this report to the entities listed in the transmittal memorandum.

This report is intended solely for the information and use of the OPM Chief Financial Officer and OPM Inspector General and is not intended to be used by those who have not agreed to the procedures or have not taken responsibility for the sufficiency of the procedures for their purposes. However, the report is a matter of public record and its distribution is not limited; thus, we will post the report on our Web site and provide copies upon request.

Sincerely,



Patricia A. Marsh  
Assistant Inspector General  
Defense Business Operations

Attachment:  
As stated

# Attachment: Agreed-Upon Procedures Performed and Results

This section contains the OPM agreed-upon procedures and the results of completing those procedures.

## Overall Procedure

Obtain the Agency Payroll Provider's (APP) September 2008 and March 2009 Semiannual Headcount Report submitted to OPM and a summary of Retirement and Insurance Transfer System (RITS) submissions for September 2008 and the current fiscal year. For Retirement, Health Benefits, and Life Insurance select a total of three RITS submissions for September 2008 and the current fiscal year; two will coincide with the September 2008 and March 2009 Semiannual Headcount Report. Obtain payroll information for the periods covered by the RITS submissions selected.

## Procedure 1.

Compare RITS submission data with payroll information by performing the following procedures (Note: For cross-servicing agencies, if the internal controls are the same for all agencies serviced, it is only necessary to perform this procedure for one agency.):

### ***Procedure 1.a.***

Recalculate the mathematical accuracy of the payroll information.

### ***Procedure 1.b.***

Recalculate the mathematical accuracy of each RITS submission for the payroll information selected in step 1.a.

### ***Procedure 1.c.***

Compare the employee withholding information at the aggregate level for Retirement, Health Benefits, and Life Insurance (as adjusted for reconciling items) shown on the payroll information obtained in step 1.a. to the related amounts shown on the RITS submission for the corresponding period.

Report any differences for each of the Retirement, Health Benefits, and Life Insurance (categories) for step 1.c. that are over one percent of the aggregate amount reported for each of the three categories. Obtain from management a management official name, an explanation, telephone number, and an email address for the differences above the one percent threshold.

## **Results**

There were no differences greater than one percent for this comparison.

## **Procedure 2.**

(See Procedures 2.a.-j.)

### ***Procedure 2.a.***

Randomly select a total of 25 individuals who were in the payroll system for all three of the RITS submissions selected above that meet all the following criteria:

- covered by the Civil Service Retirement System (CSRS) or the Federal Employees Retirement System (FERS);
- enrolled in the Federal Employees Health Benefit Program (FEHB);
- covered by Basic Life Insurance; and
- covered by at least one Federal Employees' Group Life Insurance (FEGLI) optional coverage (Option A, B or C).

### ***Procedure 2.b***

Obtain the following documents, either in electronic or hard copy format, from the Official Personnel File (OPF) for each individual selected in step 2.a. Hard copies can be originals or certified copies.

- All Notifications of Personnel Actions (SF-50) covering the pay periods in the RITS submissions chosen;
- The Health Benefits Election Form (SF-2809) covering the pay periods in the RITS submissions chosen or, if applicable, obtain a report (via the agency personnel office) from the agency's automated system that allows participants to change benefits, (e.g., Employee Express), for any Health Benefits transactions in that system for the individuals selected in step 2.a. (note: a new SF-2809 is needed only if an employee is changing health benefit plans, therefore, the form could be many years old); and
- The Life Insurance Election Form (SF-2817) covering the pay periods in the RITS submission chosen (note: a new SF-2817 is needed only if an employee is changing life insurance coverage, therefore the form could be many years old).

### ***Procedure 2.b.i.***

For Health Benefits, compare date of transaction with date on the certified copy of the SF-2809 or the agency's automated system report obtained above to identify whether the health benefit information to be used in the step 2.f. covers the pay periods in the RITS submissions chosen.

## **Results**

We identified one missing document from the Air National Guard (ANG), four from Other Defense Organizations (ODO), one from VA, and four from the EPA. DOE auditors identified one missing document from DOE, and HHS auditors identified eight missing documents from HHS. The following table identifies the specific documents missing from the respective agencies.

**Missing Documents Segregated by Agency**

<b>AGENCY</b>	<b>SF-50</b>	<b>SF-2809</b>	<b>SF-2817</b>
ANG	1		
ODO	1	1	2
VA		1	
EPA		2	2
DOE			1
HHS		5	3

***Procedure 2.c.***

For each individual selected in step 2.a., compare the base salary used for all payroll purposes and upon which withholdings and contributions generally are based to the base salary reflected on the employee’s SF-50. Report any differences resulting from this step and obtain management’s explanation for the differences.

**Results**

We found one difference for ANG and one for ODO. DOE auditors identified two differences for DOE. The applicable SF-50s were missing.

***Procedure 2.d.***

For Retirement for each individual selected in step 2.a., compare the retirement plan code from the employee’s SF-50 to the plan code used in the payroll system. Report any differences resulting from this step and obtain management’s explanation for the differences.

**Results**

We found one difference for Army, ± one for ANG, and one for ODO. The correct SF-50s were missing or an erroneous code was used on the SF-50.

***Procedure 2.e.***

For each individual selected in step 2.a., calculate the retirement amount to be withheld and contributed for the plan code from the employee’s SF-50, by multiplying the base salary from the employee’s SF-50 by the official withholding and contribution rates required by law. Compare the calculated amounts to the actual amounts withheld and contributed for the retirement plan. Report any differences resulting from this step and obtain management’s explanation for the differences.

**Results**

We found one difference for Army, ± one for ANG, and one for ODO. The correct SF-50s were missing or an erroneous code was used on the SF-50.

### ***Procedure 2.f.***

For Health Benefits for each individual selected in step 2.a, compare the employee withholdings and agency contributions to the official subscription rates issued by OPM for the plan and option elected by the employee, as documented by a Health Benefits Election Form (SF-2809) in the employee's OPF or automated system that allows the participant to change benefits (e.g., Employee Express). Report any differences resulting from this step and obtain management's explanation for the differences.

### **Results**

We found one difference for ODO, one for VA, and two for EPA. HHS auditors identified five differences. The applicable SF-2809s were missing.

### ***Procedure 2.g.***

For Life Insurance for each individual selected in step 2.a, confirm that Basic life Insurance was elected by the employee by inspecting the Life Insurance Election Form (SF-2817) documented in the employee's OPF. Report any differences resulting from this step and obtain management's explanation for the differences.

### **Results**

We did not find any differences for this comparison.

### ***Procedure 2.h.***

For each individual selected in step 2.a, calculate the withholding and contribution amounts for Basic Life Insurance using the following:

- For employee withholdings: Round the employee's annual base salary up to the nearest thousand dollars and add \$2,000. Divide this total by 1,000 and multiply by the rate required by law.
- For agency contributions: Divide the employee withholdings calculated above by two.

Compare the calculated employee withholdings and agency contributions to the actual amounts withheld and contributed for Basic Life Insurance. Report any differences resulting from this step and obtain management's explanation for the differences.

### **Results**

We found one difference for ANG and one for ODO. The applicable SF-50s or SF-2817s were missing.

### ***Procedure 2.i.***

Also, for Life Insurance for each individual selected in step 2.a., compare optional coverage elected as documented on the SF-2817 in the employee's OPF to the optional coverage documented in the payroll system. Report any differences resulting from this step and obtain management's explanation for the differences.

## **Results**

We identified one difference for the Army, <sup>±</sup> one for ANG, three for ODO, and two for EPA. DOE auditors identified one difference for DOE, and HHS auditors identified three differences for HHS. The differences involved retroactive corrections and missing SF-2817s.

## **Procedure 2.j.**

For each individual selected in step 2.a., calculate the withholding amounts for optional life insurance using the following:

- For Option A: Locate the employee's age group using the age groups provided for Option A in the FEGLI Program Booklet. The withholding amount to be used is the rate listed in the FEGLI Program Booklet for that age group. Compare the calculated amount to the amount withheld for Option A Life Insurance. Report any differences resulting from this step and obtain management's explanation for the differences.
- For Option B: Inspect the SF-2817 to obtain the number of multiples chosen for Option B. Locate the employee's age group using the age groups provided for Option B in the FEGLI Program Booklet. Round the employee's annual rate of basic pay up to the next 1000, divide by 1000, and multiply by the rate for the respective age group. Multiply this amount by the number of multiples chosen for Option B Life Insurance. Compare the calculated amount to the amount withheld for Option B Life Insurance. Report any differences resulting from this step and obtain management's explanation for the differences.
- For Option C: Inspect the SF-2817 to obtain the number of multiples chosen for Option C. Locate the employee's age group using the age groups provided for Option C in the FEGLI Program Booklet. Multiply the rate for the age group by the number of multiples chosen for Option C Life Insurance. Compare the calculated amount to the amount withheld for Option C Life Insurance. Report any differences resulting from this step and obtain management's explanation for the differences.

## **Results**

We identified one difference for the Army, <sup>±</sup> one for ANG, three for ODO, and two for EPA. DOE auditors identified one difference. HHS auditors identified three differences. The differences involved retroactive corrections and missing SF-2817s.

## **Procedure 3.**

Randomly select a total of 10 employees who have no Health Benefits withholdings from the payroll information corresponding to the three RITS submissions selected above and perform the following for each employee selected.

### ***Procedure 3.a.***

Obtain SF-2809s covering the pay periods in the RITS submissions chosen, either in electronic or hard copy format, from the selected employee's OPF or, if applicable, obtain a report (via the agency personnel office ) from the agency's automated system that allows participants to change benefits, (e.g., Employee Express), for any Health Benefit transactions in that system for the individuals selected. Hard copies can be originals or certified copies. Inspect the documentation (that is, SF-2809 or the agency's system-generated report) to identify whether health benefits coverage was not elected. This can be identified in the following ways:

- absence of an SF-2809 in the OPF and no election of coverage made through the agency's automated system that allows participants to change benefits (e.g., Employee Express); or
- an SF-2809 in the OPF with Section E checked (indicating cancellation of coverage) and no later election of coverage through the agency's automated system that allows participants to change benefits (e.g., Employee Express); or
- cancellation of coverage through the agency's automated system that allows participants to change benefits (e.g., Employee Express) and no later election of coverage with an SF-2809.

### ***Procedure 3.b.***

Compare the result in step 3.a. to the RITS submissions. Report any differences resulting from this step and obtain management's explanation for the differences.

### **Results**

We identified one difference for ODO. The available SF-2809 indicated health benefits coverage, but the payroll information did not show any coverage. An explanation for this difference was not provided to the auditors.

### ***Procedure 4.***

Randomly select a total of 10 employees who have no Life Insurance withholdings from the payroll information corresponding to the three RITS submissions selected above and perform the following for each employee selected.

#### ***Procedure 4.a.***

Obtain the SF-2817s covering the pay periods in the RITS submissions chosen, either in electronic or hard copy format, from the selected employee's OPF. Hard copies can be originals or certified copies. Inspect the SF-2817 to identify that the employee waived or cancelled Basic Life Insurance coverage.

#### ***Procedure 4.b.***

Compare the result in step 4.a. to the RITS submissions. Report any differences resulting from this step and obtain management's explanation for the differences.



## **Results**

We identified one difference for Army, <sup>±</sup> one for Navy, one for the Army National Guard, and one for EPA. The waivers were missing, the waivers were signed after our sample pay period, or personnel processed a retroactive adjustment.

## **Procedure 5.**

Calculate the headcount reflected on the September 2008 and March 2009 Semiannual Headcount Report selected, as follows.

### ***Procedure 5.a.***

Obtain existing payroll information (from step 1.a.) supporting each Supplemental Semiannual Headcount report. If existing payroll data is not available, obtain a payroll system query that summarizes detailed payroll data supporting each Supplemental Semiannual Headcount Report, as follows:

- Benefit Category (see Semiannual Headcount Report).
- Dollar Amount of withholdings and contributions.
- Number Enrolled (deductions made/no deductions).
- Central Personnel Data File Code.
- Aggregate Base Salary.

### ***Procedure 5.b.***

Recalculate the Headcount reflected on each Semiannual Headcount Report. If an electronic file is not available, a suggested method of recalculating the Headcount is as follows: (1) estimate the number of employees per payroll register page by counting the employees listed on several pages, (2) count the number of pages in the payroll register, and (3) multiply the number of employees per page by the number of pages, or count (using a computer audit routine) the number of employees on the payroll data file for the period.

### ***Procedure 5.c.***

Compare the payroll information obtained in step 5.a. and the calculated headcount from step 5.b. to the information shown on each respective Semiannual Headcount Report.

### ***Procedure 5.d.***

Report any differences (i.e., gross rather than net) greater than two percent between the headcount reporting on each respective agency Semiannual Headcount Report and payroll information from step 5.a. and the calculated Headcount from step 5.b. Obtain from management a management official name, telephone number, an e-mail address, and an explanation for the differences.

## **Results**

There were no differences greater than two percent for this comparison.

## **Procedure 6.**

Calculate employer and employee contributions for Retirement, Health Benefits, and Life Insurance as follows:

### ***Procedure 6.a.***

Calculate Retirement withholdings and contributions for the three pay periods selected in step 1.a., as follows:

#### **Procedure 6.a.i.**

Multiply the CSRS and FERS payroll base by the withholding and employer contribution rates required by law.

#### **Procedure 6.a.ii.**

Compare the calculated totals from step 6.a.i. to the related amounts shown on the RITS submissions. Report any differences (i.e., gross rather than net) between the calculated amounts and the amounts reported on the RITS submissions greater than five percent of the amounts on the RITS submission, and obtain management's explanation for the differences.

### **Results**

There were no differences greater than five percent for this comparison.

### ***Procedure 6.b.***

Calculate employee withholdings and employer contributions for Health Benefits for the three pay periods selected in step 1.a., as follows:

#### **Procedure 6.b.i.**

Multiply the number of employees enrolled in each Health Benefits plan and plan option by the employee withholdings and employer contributions for the plan and option.

#### **Procedure 6.b.ii.**

Sum the totals in step 6.b.i. and compare the result with the Health Benefit withholding and contribution amounts shown on the RITS submissions. Report any differences (i.e., gross rather than net) between the calculated amounts and the amounts reported on the RITS submissions greater than five percent of the amounts on the RITS submission, and obtain management's explanation for the differences.

### **Results**

There were no differences greater than five percent for this comparison.

### ***Procedure 6.c.***

Calculate the Basic Life Insurance employee withholdings and employer contributions for the three pay periods selected in step 1.a., as follows:

### **Procedure 6.c.i.**

Obtain a payroll system query from APP personnel to obtain the total number of employees with Basic Life Insurance coverage and the aggregate annual basic pay for all employees with Basic Life Insurance.

### **Procedure 6.c.ii.**

For employee withholdings: Add the product of 2,000 times the number of employees with Basic Life Insurance coverage from step 6.c.i above to the aggregate annual basic pay for all employees with Basic Life Insurance from step 6.c.i above to calculate the estimated total Basic Life Insurance coverage. Divide this calculated total by 1,000 and multiply by the withholding rate required by law. The Life Insurance withholding rates can be found in the FEGLI Program Booklet on OPM's website.

### **Procedure 6.c.iii.**

Compare the result in step 6.c.ii. to the withholdings for Basic Life Insurance coverage reported on the RITS submission. Report any difference (i.e., gross rather than net) between the estimate and the amount of withholdings reported on the RITS submission greater than five percent of the amounts on the RITS submission, and obtain management's explanation for the difference.

### **Results**

There were no differences greater than five percent with the exception of our calculation for VA. This difference amounted to \$2.6 million (261.3 percent). DFAS comments to the draft report stated that the difference occurred because the audit files were missing data fields for market pay. DFAS stated it would provide the information and that a system change request has been initiated to add these data fields to future audit files. However, the auditors will not be able perform these procedures again before the October 1, 2009, report deadline. DOD auditors will continue to work with DFAS to resolve this difference.

### **Procedure 6.c.iv.**

For agency contributions: Divide the results of step 6.c.ii. by two—this approximates agency contributions, which are one-half of employee withholdings. Compare this result to the amount reported on the RITS submission. Report any differences (i.e., gross rather than net) between the estimated amount and the actual amount reported on the RITS submission greater than five percent of the amounts on the RITS submission, and obtain management's explanation for the differences.

### **Results**

There were no differences greater than five percent except for VA. This difference was \$1.3 million or 261.11 percent. DFAS comments to the draft report stated that the difference occurred because the audit files were missing data fields for market pay.

DFAS stated it would provide the information and that a system change request has been initiated to add these data fields to future audit files. However, the auditors will not be able perform these procedures again before the October 1, 2009, report deadline. DOD auditors will continue to work with DFAS to resolve this difference.

### ***Procedure 6.d.***

Calculate the Option A, Option B and Option C Life Insurance coverage withholdings for the three pay periods selected by using detail payroll reports used to reconcile the RITS reports in Step 1. In addition to the information used for step 1, the reports should include the employee's date of birth, annual rate of basic pay, and number of multiples selected for Option B and C. Note: While similar to step 2.j., the calculation at this step is for the entire amount reported on the RITS submissions for the three pay periods selected, as opposed to the sample of 25 employees in step 2.j.

### ***Procedure 6.d.i.***

Multiply the number of employees in each age group by the appropriate rate for Option A in accordance with the rates for age groups provided in the FEGLI Program Booklet.

### ***Procedure 6.d.ii.***

Compare the result in step 6.d.i. to the amounts for Option A reported on the RITS submissions. Report any differences (i.e., gross rather than net) greater than two percent of the amounts on the RITS submission, and obtain management's explanation for the differences.

## **Results**

There were no differences greater than two percent for this comparison.

### ***Procedure 6.d.iii.***

Segregate the reports for Option B and Option C insurance into the age groups shown in the FEGLI Program Booklet. For Option B, round the employee's annual rate of basic pay up to the next 1000, divide by 1000, multiply by the rate for the age group, multiply this by the number of multiples:

(Annual rate of basic pay (rounded up) /1000\*rate\*multiples).

For Option C, multiply the rate for the age group by the number of multiples chosen for each employee.

### ***Procedure 6.d.iv.***

Compare the result in step 6.d.iii. to the amounts for Option B and Option C, respectively, reported on the RITS submissions. Report any differences (i.e., gross

rather than net) greater than two percent of the amounts on the RITS submission for Option B or Option C, and obtain management's explanation for the differences.

### **Results**

There were no differences greater than two percent with the exception of our Option C calculation for Other Defense Organizations. This difference amounted to \$2,290 (4.01 percent) and is primarily attributable to retroactive adjustments.

<sup>±</sup>Documentation was not corrected until after our testing disclosed the errors. Therefore, we are reporting these sample items as differences.







# Inspector General Department of Defense

