

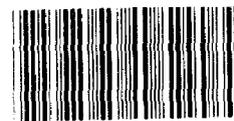
GAO

Report to the Chairman, Subcommittee on Human Resources and Intergovernmental Relations, Committee on Government Operations, House of Representatives

July 1987

HHS OFFICE FOR CIVIL RIGHTS

Questions Regarding Travel by the Director



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July 2, 1987

The Honorable Ted Weiss
Chairman, Subcommittee on Human Resources
and Intergovernmental Relations
Committee on Government Operations
House of Representatives

Dear Mr. Chairman:

In your letter of September 15, 1986, you asked us to examine the travel and procurement practices of the director of the Office for Civil Rights (OCR), Department of Health and Human Services (HHS), Betty Lou Dotson. Your concerns were initially expressed during an oversight review of OCR and subsequent hearings held in August 1986. At these hearings, you questioned the OCR director's extensive travel at government expense when every aspect of HHS's operations was facing major cutbacks.

We addressed the following questions set forth in the request and agreed to in subsequent meetings with your office:

- Was the director's use of blanket travel orders and advances in conformance with applicable HHS travel regulations?
- What was the relationship between the mission and responsibilities of OCR and the director's domestic travel to conferences and meetings?
- Was the director's use of funds for domestic travel, specifically for taxis, rental cars, weekend per diem, and substitute airline meals (meals claimed for reimbursement when those available on an airplane were not eaten), in conformance with applicable HHS travel regulations?
- What was the relationship between the mission and responsibilities of OCR and the director's international travel?
- Was the director's use of funds for international travel in conformance with applicable HHS travel regulations?
- What were the circumstances leading to the issuance and payment of a \$1,500 purchase order to the National Conference of Black Mayors, and were the services actually rendered?

Objectives, Scope, and Methodology

Our review was conducted at the OCR and the HHS Travel Accounting Branch during the period October 1986 through March 1987. We examined travel records pertaining to the director's domestic trips for fiscal years 1984 through 1986, and international trips from the time of her appointment in August 1981 through September 1986. At the

request of the Subcommittee, we also reviewed the OCR deputy director's travel voucher for his December 1984 trip to Africa.

The travel vouchers were examined for conformance with applicable federal and HHS travel regulations. We also reviewed documentation developed by OCR staff concerning the nature of the director's official business while on travel. In addition to interviewing OCR and Travel Accounting Branch staff involved in planning, approving, and processing the director's travel, we met with the director to discuss her travel and travel documentation practices and the discrepancies we identified.

Results in Brief

During fiscal years 1984-86, the director made 83 domestic trips to 107 locations at a total cost to the government of \$49,640.94, including \$23,485.82 for airfare and \$26,155.12 for per diem and other expenses. The other expenses, which were reimbursed in addition to per diem, included taxi fares of \$5,119.25. From her appointment as OCR director in August 1981 until September 1986, she also made seven international trips at a total cost to the government of \$14,159.35 (including \$8,024.13 for airfare and \$6,135.22 for per diem and other expenses).

Our responses to your questions regarding the OCR director's travel and documentation practices are summarized below.

Blanket Travel Orders and Advances

In general, the OCR director conformed with HHS regulations regarding blanket travel orders and advances, except in several instances where the proper approvals were not obtained. Because she traveled under blanket travel orders, she was not required to document the specific purpose of any of her 83 domestic trips. Furthermore, HHS travel procedures allowed the OCR director to review and approve her own travel orders.

OCR Mission and Domestic Travel to Conferences/ Meetings

Of the director's 46 domestic trips to conferences and meetings, OCR staff could provide documentation for 29, most of which appeared related to OCR's mission. But we could not determine the specific purposes of 17 other trips, costing a total of \$12,083.66, for which OCR staff could provide no support materials. Furthermore, HHS did not independently review the relationship of these trips to the OCR mission.

Domestic Travel Expenses

With respect to use of funds for domestic travel, specifically claims for taxicab rides, rental cars, weekend per diem, and substitute airline meals, the OCR director generally conformed with HHS travel regulations. Exceptions, which the travel branch allowed to be reimbursed, were: some taxicab and rental car claims that lacked proper approval, improper justification for claiming substitute airline meals, and two duplicate expenses. The duplicate expenses involved two instances in which the voucher and accompanying rental car receipt indicated that the director took a taxi and a rental car on the same date, to and from the same location. Because the OCR director was authorized to review and approve her travel expenses, there was no independent review of whether the expenses she claimed were justified or reasonable.

OCR Mission and International Travel

Of the director's seven international trips, only one clearly was related to OCR's mission and responsibilities. The remaining trips, which cost \$13,036.53, may have been related to OCR goals, but due to lack of documentation on the purposes, we could not make a determination. In making these trips, the OCR director did not adhere to HHS's international travel requirements for advance approval, planning, and trip reports.

International Travel Expenses

In general, the OCR director conformed with HHS regulations regarding international travel except for improper justifications in claiming reimbursement for substitute airline meals and failing to reduce per diem when meals were included in a registration fee paid by the government. Because the director could approve her own travel expenses, there was no independent review of whether the international travel expenses she claimed were justified or reasonable.

Issues Referred to the Federal Bureau of Investigation

During the course of our work, we referred the issue of the \$1,500 purchase order to the National Conference of Black Mayors to our Office of Special Investigations (OSI) for further review. This investigation disclosed that, while the director authorized the award of the purchase order, the proposed services were not rendered. The results of that investigation and other information developed by OSI indicating possible falsification of travel vouchers have been referred to the Federal Bureau of Investigation for further review and possible referral to the Public Integrity Section of the U.S. Department of Justice. Because these issues are still under investigation by the FBI, we do not address them in this report.

Recommendations

We recommend that the Secretary of Health and Human Services require

- periodically an independent review of the reasonableness and justification of the domestic and international trips taken and expenses claimed by officials who authorize and approve their own travel orders and vouchers;
- documentation on file as to the purposes for trips taken under blanket travel orders;
- that trips to conferences and meetings by personnel who normally travel under blanket travel orders be authorized on a trip-by-trip basis; and
- enforcement of existing requirements for international travel, including those on advance approval, planning, and trip reports.

As requested by your office, we did not obtain official agency comments on a draft of this report. We did, however, discuss aspects of our work with several OCR and HHS officials, including Ms. Dotson. Their views are included where appropriate. Our work was performed in accordance with generally accepted government auditing standards.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies of the report to the Secretary of Health and Human Services. Copies will be provided to other interested parties upon request.

Sincerely yours,



Richard L. Fogel
Assistant Comptroller General

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Abbreviations

AMID	Administration and Management Information Division
FBI	Federal Bureau of Investigation
GAO	General Accounting Office
GSA	General Services Administration
HHS	Department of Health and Human Services
NCBM	National Conference of Black Mayors
NNPA	National Newspaper Publishers Association
OCR	Office for Civil Rights
OIA	Office of International Affairs
OSI	Office of Special Investigations

HHS Office for Civil Rights: Questions Regarding Travel by the Director

Background

The Office for Civil Rights (OCR) is managed by a director who reports directly to the Secretary of Health and Human Services. OCR's primary mission is to eliminate unlawful discrimination and ensure equal opportunities for beneficiaries of federal financial assistance from the Department of Health and Human Services (HHS). OCR is responsible for the administration and enforcement of departmental policies under title VI of the Civil Rights Act of 1964, the Comprehensive Health Manpower and Nurse Training Acts of 1971, the Rehabilitation Act of 1973, the Hill-Burton Act, the health care and related block grant statutes, and the Age Discrimination Act of 1975. In fiscal year 1986, OCR had a total budget of \$15,312,000.

Betty Lou Dotson, director of OCR from August 1981 until March 1987, traveled extensively at government expense. During fiscal years 1984-86, she took 83 trips to 107 locations within the United States at a cost to the government of \$49,640.94. She also took seven trips to foreign countries from August 1981 through September 1986 at a cost of \$14,159.35.

Travel by HHS employees on official business must be accomplished in accordance with the provisions of pertinent statutes, regulations, orders, and comptroller general decisions. HHS travel policies can be more restrictive than, but can not conflict with, federal travel regulations. Agency officials may authorize or approve only that travel necessary to accomplish the agency's mission in the most effective and economical manner, according to federal regulations. Also, an employee traveling on official business is expected to exercise the same care in incurring expenses, the regulations state, that a prudent person would exercise if traveling on personal business. According to HHS officials, the department relies on the personal integrity of its top management travelers to assure that travel is for official business and complies with federal regulations.

Although the director could approve her own travel, her travel orders usually were approved by her subordinates, at her recommendation. Her domestic travel orders stated no specific reason for each trip taken except, "... in connection with duties pertaining to the work for civil rights." The vouchers for these trips were approved by her subordinates and received no review for appropriateness beyond OCR.

Federal and HHS travel regulations place responsibility for reviewing the appropriateness of travel and related expenses claimed on the authorizing official. The HHS Travel Accounting Branch, within the Division of

Accounting Operations in the Office of the Assistant Secretary for Management and Budget, reviews all travel vouchers for the allowability of the expenses claimed.

GAO Findings

Our responses to the Chairman's concerns regarding the former OCR director's travel and travel documentation practices follow.

Blanket Travel Orders and Advances

In general, the OCR director conformed with HHS regulations regarding blanket travel orders and advances, except in several instances where the proper approvals were not obtained. Because the OCR director traveled under blanket travel orders, she was not required to document the specific purpose of any of her 83 domestic trips. Furthermore, HHS travel procedures allowed the OCR director to review and approve her own travel orders.

Travel Orders

HHS may issue any of three types of travel orders:

- A trip-by-trip authorization is the preferred means for authorizing travel, according to HHS regulations. This authorization must specify the time period, purpose, itinerary, and estimated cost for each trip.
- Limited open authorization, while available in certain instances, is expressly discouraged. It is permitted only if a trip-by-trip order is not feasible. These orders allow travel without further authorization but must state realistic limitations covering the specific purpose, geographic area, cost, and travel duration. Limited open orders are restricted to employees who (1) are required to make at least three trips per month or average more than 10 days per month in travel status in a restricted geographical area and (2) must frequently take trips on their own initiative without having the time to obtain more specific orders.
- An unlimited open (or blanket) authorization is reserved for use by the HHS Secretary, under secretary, chief of staff, heads of staff and operating divisions, and regional directors because it permits an individual to travel for any purpose without further authorization. In stating the purpose for travel under a blanket order, the HHS travel regulations suggest using general language (e.g., "to consult with and advise regional office staff on administrative matters"). Under a single blanket travel order, a traveler could take more than one trip, to more than one destination, for a variety of purposes. Blanket travel orders, as well as other types of orders, must be signed by an individual designated to authorize travel.

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This individual also is responsible for reviewing the use and need for blanket travel orders on a monthly basis.

As the head of a staff division, the OCR director is permitted to use blanket travel orders. The director's 83 domestic trips to 107 destinations during fiscal years 1984-86 (summarized in table I.1) took place under 31 blanket travel orders. The itinerary and purpose stated on 29 of these orders was "From Washington, D.C. to points within the continental United States as often as necessary in connection with duties pertaining to the work for civil rights and return."

Table I.1: Summary of OCR Director's Domestic Travel (Fiscal Years 1984-86)

Fiscal year	Total trips	Purpose			Total cost
		Regional administration	Conference/meeting	Both	
1984	23	6	12	5	\$14,614.19
1985	35	18	10	7	22,437.63
1986	25	13	8	4	12,589.12
Totals	83	37	30	16	\$49,640.94

Under OCR travel procedures, the director could approve her own travel orders. Under some circumstances, however, the travel procedures also allowed the director of OCR's Administration and Management Information Division (AMID) to approve travel orders. Thus, in essence the director was approving her own travel since, as her subordinate, the AMID director was not in a position to deny the director approval to travel.

The AMID director approved 24 of the OCR director's 31 travel orders, the OCR director approved one of her own travel orders, and the deputy director approved two. Three orders were signed by individuals not authorized to do so. The remaining order was missing, and we were unable to determine who signed it. No review of the director's travel orders took place beyond OCR.

No official record was kept of the purposes of the director's 83 domestic trips, except for the general statement on her blanket travel order. At the request of the Subcommittee staff, OCR staff developed information on the specific purposes for each trip in preparation for the August 1986 oversight hearings. According to this information, 37 trips were for "regional administration," 30 for conferences and meetings, and 16 for both purposes.

Travel Advances

HHS travel regulations provide for issuance of travel advances to permit employees to receive funds before traveling. An authorizing official must sign the travel advance request form. Travelers must repay promptly any difference between the amount they claim on their travel vouchers and the amount they received as an advance.

From October 1983 through February 1985, the OCR director usually received an advance shortly before each trip (more than one advance per month); from March 1985 through September 1986, she requested and received one advance per month. The deputy director of management and policy authorized 22 of the director's 47 travel advances, and the AMID director authorized 17. Seven were signed by individuals not authorized to do so. The remaining advance form was missing, and we could not determine who signed it.

OCR Mission and Domestic
Travel to Conferences/
Meetings

Of the director's 46 domestic trips to conferences and meetings, OCR staff could provide documentation for 29, most of which appeared related to OCR's mission. But we could not determine the specific purposes of 17 other trips, costing a total of \$12,173.91, for which OCR staff could provide no support materials. Furthermore, HHS performed no independent review of the relationship of these trips to the OCR mission.

As discussed earlier, OCR's primary mission is to eliminate unlawful discrimination and ensure equal opportunity for the beneficiaries of HHS financial assistance. The OCR director solicits the participation of beneficiaries and recipients in the conduct of the department's civil rights enforcement and voluntary compliance programs. The director is also responsible for communicating civil rights-related matters to components within HHS, other federal departments and agencies, and state and local governments.

HHS policy directs authorizing officials to consider several criteria in determining when attendance at nongovernmental meetings is appropriate; i.e., for official purposes, in the best interests of the department, and concerned with an authorized program or activity in which HHS has an interest. Authorization to attend a meeting is to be requested on a Form HEW-99, but a travel order may be used to request authorization to attend a meeting out of town. Because of the relatively high costs associated with conference attendance, HHS travel policy further states that such travel "will be authorized only on a trip-by-trip basis." The travel branch, however, interprets the use of blanket travel orders to be an exception to this requirement.

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Due to the director's use of blanket travel orders, there was no specific documentation of the purposes of her domestic trips, including those to attend conferences and meetings. HHS policy does not require documentation after a traveler attends conferences or meetings other than the travel voucher, which states only the cities visited.

At the request of the Subcommittee staff and in preparation for oversight hearings held in August 1986, the OCR staff developed information on the specific purposes for each of the director's trips. Various sources, including the director's personal recollections, were used. For 17 of the director's 46 trips to conferences and meetings, the OCR staff could provide no documentation, but for 29 of the trips they did give us supporting materials (see table I.2 for information drawn from these). Most of the materials showed the conferences and meetings to be related to the mission of OCR or the director's responsibilities, as discussed below.

Table I.2: OCR Director's Domestic Trips to Conferences and Meetings (Fiscal Years 1984-86)

Dates		Destination	Sponsoring organization	Supporting materials
From	To			
Fiscal year 1984:				
11/21	11/27	Shreveport New Orleans	League of Cities National Black Caucus	None None
02/22	02/24	Orlando	National Association of Human Rights Workers	None
04/17	04/21	St. Louis	National Conference of Black Mayors	Speech
04/30	05/07	Chicago St. Louis	Not provided Not provided	None None
05/09	05/11	Huntsville	Historically Black Colleges and Universities	None
05/25	05/29	St. Louis	Opportunities Industrialization Center	None
06/04	06/05	Chicago	Not provided	None
06/07	06/10	Atlantic City	National Association of Americans of Asian Indian Descent	None
06/13	06/16	Philadelphia	National Newspaper Publishers Association	None
07/01	07/05	Kansas City	National Association for the Advancement of Colored People	None
07/08	07/10	St. Louis	International Association of Official Human Rights Agencies	Speech
07/12	07/14	Huntsville	Historically Black Colleges and Universities	None
07/26	08/01	Huntsville	Alabama A&M	Brochure
08/03	08/06	Cleveland	Alpha Phi Alpha	None
09/13	09/15	Tuskegee	World Conference of Mayors	Brochure
09/18	09/20	Atlanta	Historically Black Colleges and Universities	Agenda
09/23	09/27	Chicago	Not provided	Notes

(continued)

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Dates		Destination	Sponsoring organization	Supporting materials
From	To			
Fiscal year 1985:				
10/08	10/10	New Orleans	Louisiana Equal Opportunity Association	None
10/18	10/20	Reno	National Institute for Women of Color	Brochure
10/25	10/29	Tallahassee	Not provided	None
11/09	11/11	Monroe, LA	National Association for the Advancement of Colored People	None
11/16	11/18	St. Louis	Women in Community Service	None
11/22	11/25	Indianapolis	League of Cities	None
03/13	03/19	Houston	President, National Medical Association	Notes
04/11	04/13	Monroe, LA	Louisiana Equal Opportunity Association	Speech
04/18	04/19	Hartford	National Conference of Black Mayors	Speech
04/21	04/26	San Francisco	National Conference on Aging	Speech
05/05	05/08	Indianapolis	Opportunities Industrialization Center	Thank you
06/23	06/25	Dallas	National Association for the Advancement of Colored People	Invitation
07/05	07/09	Chicago	International Association of Official Human Rights Agencies	Agenda
07/11	07/13	Jackson, MS	National Caucus on Black Aged	Speech
07/19	07/22	Las Vegas	National Medical Association	Speech
07/23	07/28	Chicago	National Bar Association	Speech
08/09	08/12	Atlanta	Alpha Kappa Alpha	Speech
Fiscal year 1986:				
01/15	01/17	Jackson, MI	Not provided	None
03/05	03/06	Jackson, MS	Historically Black Colleges and Universities	None
04/07	04/08	Nashville	Historically Black Colleges and Universities	Invitation
04/10	04/12	Atlantic City	National Conference of Black Mayors	Agenda
06/06	06/07	Jackson, MS	Historically Black Colleges and Universities	Brochure
06/19	06/20	Greensboro	National Newspaper Publishers Association	Invitation
06/29	07/01	Baltimore	National Association for the Advancement of Colored People	Agenda
07/13	07/15	Detroit	Alpha Kappa Alpha	Invitation
07/25	08/02	Monroe, LA Denver Chicago	Louisiana Conference of Black Mayors National Bar Association World Conference of Mayors	Speech Speech Agenda
09/10	09/12	Baton Rouge	Louisiana Equal Opportunity Association	Brochure
09/19	09/21	Jackson, MS	Mississippi Black Mayors	Invitation
09/24	09/27	Kansas City	Missouri Conference of Black Mayors	Thank you

In 11 of the 12 speeches, the director discussed OCR-related topics including the federal civil rights laws and procedures for filing discrimination complaints. The remaining speech, on career planning, was delivered to members of the Alpha Kappa Alpha sorority. In her testimony before the Subcommittee, the director stated that this sorority, a national organization of black college-educated women involved in social welfare programs, was "one category of groups that we try to reach."

The OCR staff gave us 10 brochures and agendas for meetings attended by the director. All the sponsoring organizations appeared related to the mission and/or responsibilities of OCR. Six agendas listed the director as a speaker or participant. These included the director as a commencement speaker and as an award recipient. Four agendas did not mention the director.

Of five invitations we reviewed, three were specifically OCR-related. The remaining two invited the director to be one of several federal "representatives" at meetings.

One of two thank-you letters provided by the OCR staff mentioned the director participating in a symposium, the subject of which was not specified. The second letter did not specifically explain the director's role at the meeting in question. Similarly, it was not possible to discern the director's role from the two other pieces of documentation provided (handwritten notes from an interview and an outline of a project dealing with senior citizens).

Domestic Travel Expenses

Generally, with respect to use of funds for domestic travel, specifically claims for taxicab rides, rental cars, weekend per diem, and substitute airline meals, the OCR director conformed with HHS travel regulations. Exceptions, which the travel branch allowed to be reimbursed, were: some taxicab and rental car claims that lacked proper approval, two duplicate expenses, and improper justifications for claiming substitute airline meals. Because the OCR director was authorized to review and approve her own travel expenses, there was no independent review of whether the expenses she claimed were justified or reasonable.

During fiscal years 1984-86, the OCR director took 83 domestic trips to 107 destinations, at a total cost to the government of \$49,640.94. Of this, the director claimed and was reimbursed \$26,155.12 for a variety of expenses. The expenses claimed included per diem for lodging, meals, tips, etc., as well as other expenses that are reimbursed in addition to per diem. Other expenses claimed by the director included local transportation costs, notably taxi fares totaling \$5,119.25.

The director's secretary prepared her travel vouchers after the director provided receipts and an oral account of her expenses. The vouchers usually were approved by OCR's AMID director, who said he did not review them closely. Specific authorizations for certain expenses were provided by other OCR staff. HHS's travel branch reviews vouchers only

to determine that proper authorizations were given and that costs claimed are allowed under HHS's regulations. According to travel branch officials, they rely on the approving official to determine the reasonableness of the expenses claimed.

Details of the expenses claimed by the director for domestic travel are discussed below.

Taxicab Rides

Government travelers should use the transportation mode of greatest advantage to the government, according to HHS regulations. Further, public transportation should be used for local travel whenever appropriate, unless this causes undue inconvenience or physical hardship on the traveler. Taxicabs are allowed when the authorizing official determines their use is to the government's advantage. "Extra" taxis are defined as taxi rides other than those between the traveler's residence/lodging or place of business and the common carrier terminal (e.g., from the hotel to a meeting). To receive reimbursement for extra taxis, a traveler should have the approving official's specific authorization or approval.

Travelers must supply receipts for taxicab expense claims of more than \$25. The travel branch relies on the approving official to determine the reasonableness of travel claims. If extra taxis are authorized, the travel branch does not question the approving official's judgment, according to a travel branch official.

The director took 431 domestic taxi rides while in travel status in fiscal years 1984-86. These rides cost \$5,119.25, 20 percent of the nonairfare expenses claimed. None of the domestic vouchers we reviewed indicated that the director ever used any less costly form of transportation, such as a bus or airport limousine. Of the 431 taxi rides claimed, 225 were extra taxi rides—52 percent of the total rides. The extra taxis cost \$1,483—29 percent of the total cost of taxis. The vouchers showed that extra taxi rides claimed usually were taken between the hotel and OCR's regional offices or other meetings.

None of the 431 taxi rides claimed on the vouchers was over \$25. The extra taxi rides usually were authorized by the OCR deputy director. Seven of the extra taxi rides claimed, totaling \$40, lacked the required approval.

The OCR director cited several reasons, including convenience, efficiency, and unfamiliarity with public transportation schedules, as to why she

prefers taxis to other forms of local transportation. She often claimed only \$25 reimbursement for taxi rides costing more, she said, because she either did not ask for or did not retain the necessary receipts.

Rental Cars

When planning to rent a car, travelers must first consider companies under contract with the General Services Administration (GSA), according to HHS travel regulations. Use of a noncontract agency must be explained on the vouchers, and rental cars as special conveyances must be specifically approved. Also, if rental cars cost more than \$25, receipts are required.

The director rented cars 27 times during the period reviewed, for a total cost of \$2,239.17. She used a noncontract rental car 10 times, 4 without authorization.

According to the director, she did not check whether the rental car agencies she used were under GSA contract because she did not make her own travel arrangements. She used a government-issued rental agency credit card and assumed it would not have been issued to her if she were not supposed to use it.

Car Rental/Taxicab Conjunction

On three trips during fiscal years 1984-86, the director claimed reimbursement for taxi rides she took while also renting cars. The total cost of the taxi rides on these three trips was \$126 and of the rental cars, \$298.80. On two of the three trips, the voucher and accompanying rental receipt indicated that the director took a taxi and a rental car on the same date, to and from the same location.

In two of three instances, the mileage put on the rental car was low; 6 miles for a 1-1/2-day trip and 30 miles for a 3-day trip. While HHS regulations do not prohibit using both rental cars and taxis on the same trip, the need for the rental cars in these cases is questionable.

The OCR director did not recall using rental cars and taxis in the same city during the same trip. She suggested that she may have rented the car and then found taxis more expeditious. She did not recall the circumstances surrounding the duplicate claims, but speculated that this was an oversight in the preparation and review of the travel voucher.

Weekend Travel

Agencies are required by the Federal Employees Salary Act of 1965 to schedule employees' travel within the regular workweek "to the maximum extent practicable." Regulations do not prohibit travel on weekends, however, as long as the traveler is on official business and a valid travel order has been approved.

During fiscal years 1984-86, the director took 58 trips that included weekends or holidays. She was traveling under blanket travel orders during these weekend/holiday periods. As discussed earlier, her subordinates approved this travel at her direction, and no official record was required or kept explaining the specific purposes for the travel when blanket orders were used. Of the 58 trips involving weekends or holidays, 25 were for "OCR regional administration," 26 for meetings and conferences, and 7 for both purposes, according to information developed by OCR staff. "Regional administration" meant that the director was meeting or working with OCR regional personnel, the staff said. This would include Saturdays, Sundays, and holidays when federal offices are normally closed.

Substitute Airline Meals

When meals are provided on airplanes, the traveler normally cannot claim reimbursement for the same meals eaten after the plane lands, under HHS travel regulations, regardless of whether the airline meal was consumed. The HHS travel branch interprets these regulations as exempting travelers who indicate medical problems preclude them from eating airline meals. The Comptroller General has ruled that statements that the quality or quantity of airline meals is not what the traveler is accustomed to are not justifiable reasons for claiming reimbursement for substitute meals after the plane lands.

According to her travel vouchers, the director declined 22 airline meals during fiscal years 1984-86 and claimed \$264.00 for substitute meals eaten after the plane landed. The director certified on her vouchers that she did not eat the airline meals because of a "special diet" or "air sickness." She told us, however, that her reasons for declining airline meals were not medical. She refused airline meals, she said, because she disliked airline food, finding it to be of poor quality and inadequate quantity. As discussed above, these were not justifiable reasons for claiming reimbursement for substitute meals. Current travel regulations (effective July 1986) establish a flat rate for meals and incidental expenses.

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Recommendations

Based on our review of domestic travel, we recommend that the Secretary of Health and Human Services require

- periodically an independent review of the reasonableness and justification of the trips taken and expenses claimed by officials who authorize and approve their own travel orders and vouchers;
- documentation on file as to the purposes for trips taken under blanket travel orders; and
- that trips to conferences and meetings by personnel who normally travel under blanket travel orders be authorized on a trip-by-trip basis.

OCR Mission and International Travel

Only one of the director's seven international trips—to Jamaica—was clearly related to the mission and responsibilities of OCR. The remaining trips, costing a total of \$13,036.53, may have been related to OCR goals, but due to the lack of documentation on the purposes for these trips, we could not make a determination. In making these trips, the OCR director did not adhere to HHS's existing requirements for international travel for advance approval, planning, and trip reports. (A list of the trips and sponsors appears in table I.3.)

Table I.3: OCR Director's International Travel (Aug. 1981-Sept. 1986)

Dates		Destination	Sponsoring organization	Purpose	Total cost
From	To				
07/14/82	07/16/82	Halifax, Nova Scotia, Canada	International Association of Official Human Rights Agencies	Conference speech	\$576.99
09/05/82	09/11/82	Paris, France	Fourth International Congress on Child Abuse and Neglect	To attend the Congress	2,149.00
01/25/84	01/28/84	Montego Bay, Jamaica	National Newspaper Publishers Association (NNPA)	To attend the NNPA conference	1,122.82
07/26/84	08/01/84	Montreal, Canada	National Medical Association	To participate in various workshops	492.81
12/08/84	12/16/84	Dakar, Senegal; Abidjan, Ivory Coast; Monrovia, Liberia	National Conference of Black Mayors (NCBM)	To conduct workshops and meet with members of NCBM and the World Conference of Mayors	4,202.15
08/24/85	08/28/85	Nassau, Bahamas	World Conference of Mayors	To serve as a resource person	1,216.38
11/04/85	11/22/85	Hong Kong; Guangzhou, Beijing, Urumqi, Xi'an, China	National Conference of Black Mayors	To serve as a consultant and resource person	4,399.20
Total					\$14,159.35

International travel is subject to more stringent justification, approval, and monitoring procedures, under HHS travel regulations, than is domestic travel. International travel to nongovernment conferences or meetings, such as those attended by the OCR director from August 1981 through September 1986, is allowable. However, attendance should clearly relate to the traveler's job responsibilities, benefit the traveler's program and/or HHS, or be advantageous to the federal government.

The HHS Office of International Affairs (OIA) must be advised in advance of all international travel by employees of such staff offices as OCR. This advance notice takes the form of a "Notification of Foreign Travel." HHS regulations require that annual international travel plans and budgets, quarterly international travel reports, and individual trip reports be submitted.

Neither OIA nor OCR could provide annual plans, quarterly reports, or individual trip reports for the OCR director's seven international trips. OIA provided Notifications of Foreign Travel for two of the trips and a report prepared at the end of fiscal year 1985 on OCR staff international travel, which covered two of her other international trips.

Unlike the director's domestic travel, five of her seven international trips were authorized under trip-by-trip travel orders. The director authorized four trips, and her subordinate, the OCR AMID director, one. The original travel orders for the remaining two trips were unavailable for our review. In examining the purposes stated on the available orders, materials provided by OCR staff, and OIA records relating to the international trips, we found that:

- The trip to Nova Scotia was to give a speech to the International Association of Official Human Rights Agencies. The subject of the speech was not documented.
- Only a trip to Jamaica contained an explanation of the relationship of the travel to the mission of OCR. The explanation noted that the sponsoring organization, the National Newspaper Publishers Association, was a major organization of minority newspaper publishers whose members could be helpful in communicating with OCR's minority constituencies.
- The stated purpose of trips to Nassau and China was "to serve as a resource person." No explanation of the role of a resource person was included for the Nassau trip. The China trip involved meeting with U.S. and Chinese mayors and participating in workshops on sister city health programs.

- Two trips, to Montreal and Africa, were to “participate in or to conduct workshops.” The specific nature of the workshops was not explained.
- The stated purpose of the Paris trip was “to attend the Fourth International Congress on Child Abuse and Neglect.”

The purpose of the deputy director’s trip to Africa was “to meet with embassy officials and to conduct workshops and to meet with the World Conference of Mayors.”

International Travel Expenses

In general, the OCR director conformed with HHS regulations regarding international travel except for improper justifications in claiming reimbursement for substitute airline meals and failing to reduce per diem when meals were included in a registration fee paid by the government. Because the director could approve her own travel expenses, there was no independent review of whether the international travel expenses she claimed were justified or reasonable.

For her seven international trips (Aug. 1981-Sept. 1986), costing the government \$14,159.35, the director claimed per diem and other expenses of \$6,135.22. The deputy director’s trip to Africa, which we also reviewed, totaled \$4,632.55 including per diem and related expenses of \$1,543.25.

As with domestic travel, the expenses claimed by the director were approved by her subordinates. The travel branch, relying on the judgment of these approving officials, did not question the reasonableness of the expenses claimed.

Taxis

As discussed earlier, government travelers are expected to use the transportation mode of greatest advantage to the government, under HHS regulations. Travelers must furnish receipts for charges of more than \$25, obtain the approving official’s specific authorization or approval for “extra taxis,” and indicate if taxis were shared.

During the international trips reviewed, the director and deputy director took 190 taxi rides for which they claimed \$1,992.50, including 146 “extra” rides. Of particular note:

- The director claimed \$666 for 69 taxi rides during her China trip of November 4-22, 1985. These 69 rides included two or three round-trips per day between the hotel and meetings for “morning, afternoon, and/or

evening sessions." In an interview, the director explained that, as the hosts of the China trip "allowed very little deviation from the trip schedule," she took a taxi to "get away by herself" whenever possible.

- The director claimed \$166.50 for 22 taxi rides on her Paris trip of September 5-11, 1982. This included eight trips to obtain meals. This is not a reimbursable expense under HHS regulations except where the nature and location of work is such that suitable meals cannot otherwise be obtained.
- The director and deputy director on their trip to Africa of December 8-16, 1984, did not share 18 taxi rides even though they were traveling between the same locations at apparently the same times; each claimed \$124 for these rides.

Excess Baggage Charges

HHS travel regulations require that, to claim excess baggage charges, travelers must receive authorization and furnish receipts. The deputy director did not furnish a receipt for one \$99.76 excess baggage charge claimed on his Africa travel voucher.

Substitute Airline Meals

As discussed earlier, HHS travel regulations normally do not allow reimbursement for meals substituted for airline meals, unless a traveler indicates that a medical problem precludes eating the airline meal. The director claimed two substitute meals because of "stomach problems" or "special diet," at a cost of \$33.50. She refuses airline meals, she told us, because she dislikes their taste and small portions. According to comptroller general decisions, a traveler's preferences regarding the quality or quantity of food do not constitute an adequate basis for claiming a meal on the ground as a substitute for an airline meal. Current travel regulations (effective July 1986) establish a flat rate for meals and incidental expenses.

Registration Fees

Under normal circumstances, the government pays for a traveler's lodging and meals under an established per diem rate. When the government pays a conference registration fee that includes meals and/or lodging, however, the authorized per diem allowance will be reduced. On her Nassau trip of August 24-28, 1985, the OCR director claimed reimbursement for a \$120 registration fee for the conference that she attended. The fee included some meals, but the per diem allowance was not reduced.

The director did not recall the circumstances of where she stayed and whether she ate the meals included in the registration fees on her Nassau trip.

Recommendations

We recommend that the Secretary of Health and Human Services

- take steps to enforce the existing requirements for international travel, including those on advance approval, planning, and trip reports, and
- require periodically an independent review of the reasonableness of the international travel expenses claimed by officials who authorize and approve their own vouchers.

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