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GAO

Report to Congressional Requesters

September 1987

VETERANS ADMINISTRATION

Proposed Consolidation of Philadelphia and St. Paul Insurance Offices

134095

GAO/HRD-87-106

GAO

United States
General Accounting Office
Washington, D.C. 20548

Human Resources Division

B-229029

September 16, 1987

The Honorable Rudy Boschwitz
The Honorable Dave Durenberger
United States Senate

The Honorable Bill Frenzel
The Honorable James L. Oberstar
The Honorable Timothy J. Penny
The Honorable Martin Olav Sabo
The Honorable Gerry Sikorski
The Honorable Arlan Stangeland
The Honorable Bruce F. Vento
The Honorable Vin Weber
House of Representatives

In response to your May 7, 1986, request, we have reviewed the Veterans Administration's (VA's) cost-benefit analysis of a proposal to consolidate its insurance operations by merging the St. Paul office with the Philadelphia office.

VA estimated that during the first 5 years, the consolidation would save $3.94 million. On a discounted basis (estimated present value of future costs and savings), VA estimated 5-year savings of $2.4 million.

We question the validity of VA's estimated savings because (1) those for personnel cost were made primarily on the basis of lower salaries in Philadelphia without consideration that at the time of the analysis, Philadelphia's productivity level was lower and (2) those for space cost in Philadelphia to accommodate the St. Paul operations were not included. We believe that VA's estimated 5-year savings would be greatly reduced or could be eliminated if (1) the Philadelphia office's future productivity is similar to its current productivity and (2) office space cost was included. VA does not agree with us.

Background

VA's life insurance program is administered by its Philadelphia and St. Paul insurance field offices. During fiscal year 1987, staffing was about 427 positions for Philadelphia and about 163 for St. Paul. In March 1987, VA administered about 3.7 million life insurance policies, issued to veterans of the Korean conflict and prior wars and to disabled veterans. Of this total, Philadelphia administered about 2.4 million policies and St. Paul about 1.3 million. For the past 20 years or more, most veterans' insurance has been administered by private insurance companies under

VA supervision rather than directly by VA. As a result, VA's workload has declined and will continue to decline.

VA had already consolidated its insurance operations twice, consolidating 13 insurance field offices into 3—Denver, Philadelphia, and St. Paul—before 1959. In a 1962 report, GAO stated that insurance services for veterans would not be adversely affected if either the three field offices were further consolidated into one or two of the field offices were consolidated into one. GAO said that the most logical single-office operation would be in Philadelphia because about two-thirds of all VA insurance accounts were processed there. Following this report, VA moved the Denver office to St. Paul.

NOT ON ORS FOUND REPORT WITH SAME DATE & NOT SAME REPORT

In a 1969 report (B-114859, Sept. 29, 1969), GAO recommended that VA consolidate its St. Paul office with the Philadelphia one. GAO estimated savings of $872,500 annually during the first 4 years after the consolidation began in 1970 and as much as $1,118,700 each year, beginning in January 1974. GAO estimated onetime costs would be about $2.5 million, but pointed out that accumulated savings would exceed nonrecurring costs within 3 years. Estimates of costs and savings made in 1969 cannot, however, be expected to be applicable to a consolidation initiated in 1987, given the reduction in the size and staffing of the insurance operations since that time.

In January 1986, VA completed an initial cost-benefit analysis to evaluate the feasibility of consolidating its two insurance offices. The conclusion of this analysis was that it was cost-beneficial to consolidate the two offices at the Philadelphia location; an 18-month phased consolidation, to be initiated in April 1986, was recommended. VA adopted this recommendation but with a commencement date of October 1, 1986.

In July 1986, we began a review of the VA analysis; in September 1986, we discussed the tentative results with the requesters' offices. At that time, we pointed out concerns we had about certain aspects of VA's analysis. Before we were able to fully resolve these concerns and write our report, the Congress passed legislation for fiscal year 1987 appropriations including provisions delaying VA's initiating the consolidation until October 1, 1987.

At the request of the Office of Management and Budget, VA, in December 1986, recalculated its cost-benefit analysis, and provided it to us in January 1987. VA officials made some adjustments to the recalculation and, in May 1987, provided the adjusted recalculation to us. This recalculation eliminated some of our concerns relative to VA's January 1986 analysis.

Scope and Methodology

We focused mainly on three critical elements of VA's consolidation justification: (1) recurring savings for the cost of personnel, (2) recurring savings for the cost of space, as well as equipment, and (3) projected onetime cost for relocation. We reviewed the methodology and computations that VA used to estimate the costs and savings of consolidation. We did not address the basic question of whether VA should consolidate the Philadelphia and St. Paul offices.

We made our review at VA's central office in Washington, D.C., and at the St. Paul and Philadelphia offices. Our review included

- interviewing VA officials to obtain their comments and explanations on how VA did the cost-benefit analysis;
- testing the arithmetical accuracy and methodological appropriateness of selected aspects of VA's analysis, including obtaining and examining documentation supporting selected data elements;
- interviewing and obtaining data from General Services Administration (GSA) officials in both cities concerning VA's rental of office space; and
- obtaining data from the Office of Personnel Management concerning (1) federal employment opportunities in the St. Paul area and (2) federal employees' experience with early retirement.

GAO Evaluation of VA Study

VA's estimated savings of $3.94 million over a 5-year period are

- personnel cost, $3.04 million;
- space cost, $1.88 million; and
- equipment cost, $0.54 million.

The total costs saved are $5.46 million, less $1.52 million for the cost of relocation, equaling $3.94 million (undiscounted).

We are not questioning VA's estimates of savings in costs of equipment and relocation. However, we believe that VA's estimated savings in personnel cost and office space cost are not valid. VA's estimated savings in personnel cost were based on the difference between the average salaries at the two offices, which were lower at Philadelphia, and expected savings of 24 positions—mostly supervisory and clerical. However, VA, in calculating estimated savings in personnel cost, did not consider that VA's statistics showed that Philadelphia's productivity was lower than St. Paul's.[1]

Moreover, VA did not include the cost for space in Philadelphia that had been allocated to accommodate the operations to be transferred from St. Paul.

Estimated Savings and Cost for Personnel

VA's estimated 5-year savings of $3.04 million for personnel included (1) savings of $2.26 million ($451,000 annually) because the average salaries for Philadelphia employees were lower than for St. Paul employees and (2) savings of $1.63 million because VA estimated that 24 positions would be eliminated,[2] and (3) added cost of $0.85 million because of an overlap of employees at the two offices during the 18-month phase-in period.

According to the VA analysis, the average salary, as of June 30. 1986, in the Philadelphia office was about $2,600 lower than in the St. Paul office. However, although the average Philadelphia salary on June 30, 1986, was lower, VA work measurements covering that period showed that productivity in St. Paul was substantially higher.

According to VA's productivity indexes for fiscal year 1982 through the first half of fiscal year 1987, as shown in table 1, Philadelphia outperformed St. Paul through 1984. In fiscal year 1985, Philadelphia's performance declined so that it was 8 percent less efficient than St. Paul.[3] Since then, the disparity between the performances of the two offices has substantially increased. For fiscal year 1986 and the first half of 1987, St. Paul was about 26 percent more efficient than Philadelphia.

[1] Productivity relates the output of an individual organization to the labor required to produce the output.

[2] These savings are for only a portion of the 5-year period because VA did not expect the 24 positions to be immediately terminated.

[3] Efficiency is the difference between the productivity indexes of the two offices and the ratio of that difference to the index for the less productive office.

Table 1: Productivity Indexes Compared for Philadelphia and St. Paul

Fiscal year	Productivity index: Philadelphia	Productivity index: St. Paul	Percent by which St. Paul is more efficient than Philadelphia[a]
1982	81.0	79 0	−3
1983	87 0	81.0	−7
1984	93 0	87.0	−7
1985	87 0	94.0	8
1986[b]	109 7	137.7	26
1987 (6 months)	97 5	122.6	26

[a]See footnote 3

[b]VA changed its standards for measuring productivity in fiscal year 1986 to provide more accurate measurements

VA data we analyzed showed that the average salary was lower in Philadelphia, mainly because of a greater employee turnover and a large number of lower-paid, less-experienced employees in that office. According to VA, the drop in Philadelphia's productivity during fiscal year 1985 was attributable to (1) a "temporary" decline in the level of experience and (2) the need to train new employees.

Using VA's indexes, we estimate that the work performed at the St. Paul insurance office in fiscal year 1986 would have required 28 more full-time equivalent personnel had it been performed at the Philadelphia office. Annual salaries and fringe benefits for these personnel on June 30, 1986, would be about $643,500. We recognize that as new employees in Philadelphia would gain experience, their productivity would improve. However, it would be expected that their salaries would also increase because of promotions; this would reduce the average salary difference between the offices. But VA's analysis did not consider increases in salaries as these employees were promoted.

Estimated Savings and Cost for Space

VA estimated that it would save $605,000 in office space annually, beginning in fiscal year 1990. These savings equal the GSA annual rental charges for the 48,000 square feet of St. Paul office space, as well as other charges at the building. Savings would be nominal for the first 2 fiscal years (1988-89) of the 5-year period, while the consolidation was being phased in. For the whole period, VA's estimated savings totaled $1.88 million.

VA did not, however, include the cost of space in Philadelphia to accommodate St. Paul insurance operations as an additional cost of consolidation. As the result of a program change and a reorganization of existing space, VA would have sufficient space, about 27,500 square feet, available. However, without the consolidation, the 27,500 square feet would seem to be in excess of the Philadelphia office's needs. Thus, there would be an opportunity for VA to release the space to GSA and save the rental cost which, at current rental rates, is about $202,000 annually.

The recurring rental cost—$202,000 annually for 5 years—would reduce VA's estimated savings of $1.88 million in space cost by about $1.0 million.

Agency Comments and Our Evaluation

In commenting on a draft of this report, VA said that the consolidation of its insurance operations was a prudent management decision and would result in savings (see app. I).

Concerning savings in personnel cost, VA said:

- Personnel savings are based on a model of a more efficient organizational structure, which "reduces overhead costs for supervision and clerical and support services, reflects a lower average grade, and is not site specific." Because the declining workload requires less staffing, the ratio of overhead costs as a percentage of overall personnel cost will have to increase if consolidation does not occur.
- GAO attempted to use the VA's Department of Veterans Benefits' productivity measurement system to offset the savings that would be achieved through the elimination of the 24 supervisory and clerical overhead positions identified in the VA study. The system, installed in fiscal year 1986, is being refined; at this time, it is not possible to accurately compare relative productivity between offices, especially two offices where there is a significant difference in the workload mix and the functions performed.
- The productivity indexes produced by the system do not account for changes that are attributable to training or the use of overtime, nor do they reflect backlogs that occur when staffing falls below the required levels.
- GAO used productivity indexes derived from national base-year weights, which represent averages for the two offices. However, these weights do not reflect all of the time spent on administrative functions—support and finance—in Philadelphia; in addition, these weights overstate the

amount of time spent by the St. Paul office, where most administrative functions are performed outside the insurance office.

- GAO chose a "snapshot picture of productivity," based on the fiscal year 1986 productivity indexes, to arrive at the conclusion that Philadelphia would need 28 more people to do the work being done by St. Paul. GAO's conclusion is unsupported by its analysis, in which GAO (1) used the wrong base-year weights and (2) ignored the varying impact of the fiscal year 1986 hiring freeze and early-out retirement option, which had a direct impact on the work force. In Philadelphia, for example, there were 46 persons in full-time training status during fiscal year 1986 and 78 in this status during fiscal year 1987.

We agree that consolidation offers opportunities for reducing overhead costs as the direct workload declines. Our report does not question VA's estimated savings of $1.63 million in personnel cost (see p. 4), that is, 24 supervisory and clerical overhead positions.

We did not, as VA indicated, use VA's productivity measurement system to offset savings of the 24 overhead positions. We used the system to assess the reasonableness of VA's estimated savings of $2.26 million, which were specifically based on the average salary difference between the Philadelphia and St. Paul offices. Lower salaries per person may not result in savings if more people are needed to do the same work.

VA's productivity measurement system may need to be refined, but VA has used it to compare the performances of the two offices. In responding to congressional inquiries concerning the productivity of the St. Paul and Philadelphia offices, the VA Administrator, in April 1986 letters, stated that "during fiscal years 1982, 1983, and 1984, Philadelphia's productivity was higher than that of St. Paul"; however, during fiscal year 1985, Philadelphia's productivity dropped because of a decline in the experience level of new employees. This information is consistent with the productivity indexes we used for those years.

VA said that its productivity indexes do not account for changes attributable to training, use of overtime, or backlogs that occur when staffing levels drop. VA's comments imply that the need to train a large number of new employees in fiscal years 1986 and 1987 has continued to affect Philadelphia's productivity. VA officials had earlier told us that the need for this extensive training program was attributable to a high employee turnover rate. We agree that hiring large numbers of employees needing training could affect productivity. For that reason, we do not believe that the salary difference between the St. Paul and Philadelphia offices, by itself, necessarily represents savings that might be realized.

The productivity measurement system included overtime incurred by the two offices, but overtime was not used in computing the productivity indexes. The percentages of overtime hours incurred relative to total hours paid in these offices were low, about 2.5 percent for Philadelphia and about 0.6 percent for St. Paul. If overtime was considered in computing productivity indexes for fiscal years 1985, 1986, and the first half of 1987, the indexes for both offices would be somewhat lower, with the reduction for Philadelphia being slightly greater than for St. Paul. The existence of a backlog, in our view, should not affect the productivity indexes, which are based on input and output data.

We used national base-year weights, which VA said represent averages for the two offices. However, adjusting these weights to reflect the time spent on administrative and finance support functions in St. Paul, which are performed outside of the insurance office, produces results that favor St. Paul's performance even more. In addition, we measured St. Paul's performance using Philadelphia's production rates, thus adjusting for differences in the functions performed by the two offices; again, we found St. Paul's performance favored.

Our computations for staffing needs were based on the productivity indexes for fiscal year 1986; this time period approximated the June 30, 1986, date VA used to calculate the average salaries, which were the basis of a major portion of VA's estimated savings in personnel cost. We realize that as the new employees complete their training, their productivity should increase. However, VA's study did not recognize any increase in Philadelphia's salaries, which could be expected as a result of promotions to new employees.

In summary, VA has, in effect, estimated salary savings based on lower-paid, less-experienced employees without recognizing that (1) such employees produce less and (2) as their productivity increases, so will their salaries. We believe that productivity should have been considered in comparing salaries; although VA's measurement system is not perfect, it did provide a basis for evaluating the impact of differences in productivity.

With regard to space cost, VA said we neglected to consider the onetime cost that VA would have to bear in order to rearrange the Philadelphia office so as to release contiguous space. VA stated that VA officials had recently discussed with GSA's Philadelphia Regional Headquarters the disposition of the Philadelphia space set aside for the consolidation, if the consolidation did not take place.

According to VA, the space could be released to GSA, but costly renovations would be required. VA noted that, according to a GSA representative, the space that could currently be considered excess was not suited for another agency to occupy; therefore, VA would have to (1) reorganize large portions of the work force to make suitable space available and (2) incur other costly modifications, such as building a wall around the space the new agency would occupy. VA said that the GSA representative also stated that the space would be difficult to rent and would probably be vacant for a long time. If consolidation does not occur, VA said, there would be a significant onetime cost to VA and no savings, unless GSA is able to place another tenant in the space.

We believe the cost for space allocated to the consolidation is appropriately part of the total consolidation costs. We did not include the onetime cost to rearrange and renovate space in Philadelphia for a new tenant because we were not able to reasonably estimate what that cost might be; however, we believe that the onetime cost to renovate the 48,000 square feet of space that would become available in St. Paul under the consolidation would offset the cost of renovating the 27,500 square feet of space in Philadelphia. VA did not include in its study any cost for renovating the St. Paul space. The cost of the Philadelphia renovation would be recovered over time through the approximately $202,000 VA would save in annual rent charges for the Philadelphia space released to GSA.

If the consolidation does occur, the concern about filling excess space in Philadelphia would shift to St. Paul. Because the amount of space leased by the government in Philadelphia is considerably greater than in St. Paul, it would seem to us that the opportunities for finding a tenant for excess government-owned space would be better in Philadelphia. According to data provided to us by GSA, the government leases about 1.5 million square feet of space in Philadelphia and about 250,000 square feet in the Minneapolis-St. Paul area. About 35,000 square feet of space that became vacant in St. Paul in February 1986, when VA's Data Processing Center relocated, is still vacant. A GSA official in Philadelphia told us that the excess space in Philadelphia could possibly be used for records storage. He said that a portion of the building occupied by VA in Philadelphia was being so used by the National Archives.

As arranged with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from its issue date. At that time, we will send copies to the House and Senate Committees on Veterans' Affairs, other appropriate congressional committees, and the Administrator of Veterans Affairs. We will make copies available to others on request.

Janet L. Shikles

Janet L. Shikles
Associate Director

Comments From the Veterans Administration

Office of the Administrator of Veterans Affairs

Washington DC 20420

Veterans Administration

JUL 30 1987

Mr. Richard L. Fogel
Assistant Comptroller General
Human Resources Division
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Fogel:

The Veterans Administration has been making a concentrated effort to provide better service while also improving efficiency of operations. One of our most significant efforts in this regard has been to review very carefully the management and administration of the VA insurance programs. The GAO itself recommended on two previous occasions that we consolidate insurance activities in order to achieve greater economy of operations. The gradual decline in workload that is occurring, as current policyholders age and death benefits are paid, prompted reconsideration of that recommendation. The Office of Program Analysis and Evaluation, an independent staff office specializing in management and consulting activities, conducted a detailed analysis that considered a full range of options from continued two site operations to consolidation at St. Paul and consolidation at Philadelphia. The analysis focused on delivery of service to veterans and beneficiaries as well as the estimated costs and benefits of each option. The study was conducted over a five-month period from August 1985 to January 1986. The study concluded that a consolidation of operations at Philadelphia would be the most cost-beneficial and would also result in improved timeliness and service. For this and for other sound management reasons, the Congress was notified of our intention to achieve a consolidation to Philadelphia over an 18-month period beginning on October 1, 1986, as required by section 210(b)(2) of title 38. A phased consolidation was selected in order to minimize employee disruption and achieve an orderly transition even though it would be slightly less cost-beneficial than an immediate consolidation.

Due to Congressional action precluding the expenditure of funds for consolidation during Fiscal Year 1987, and at the request of the Office of Management and Budget, the VA recomputed the results of the cost-benefit analysis in December 1986. The results again indicate that the VA could achieve significant savings through the transfer of St. Paul insurance activities to Philadelphia. A net savings of $3.9 million and 23.6 full-time equivalent employees can be achieved over a five-year operational life cycle (Fiscal Years 1988-1992). Once the one-time implementation costs have been offset, annual savings in excess of $1.6 million are anticipated. Congress was apprised of these results on February 6, 1987.

2.

Mr. Richard L. Fogel

The General Accounting Office (GAO) began a review of our consolidation plan in June 1986. On April 8, 1987, the VA received a preliminary review of the GAO's findings. On July 10, 1987, the GAO provided the VA with a draft report of these findings which indicates in essence that consolidation is not cost effective due to productivity variances and office space costs. The VA does not agree with the findings in the GAO draft report and offers the following information to support our position that the consolidation of Insurance operations is a prudent management initiative.

Personnel savings are based on a model of a more efficient organizational structure that reduces overhead costs for supervision and clerical and support services, reflects a lower average grade, and is not site specific. If consolidation does not occur, the ratio of overhead costs as a percentage of overall personnel costs will have to increase as the declining workload requires fewer and fewer direct labor staff.

In their current analysis, GAO attempted to use the VA's Department of Veterans Benefits (DVB) Productivity Measurement System to offset the savings that would be achieved through the elimination of the 24 supervisory and clerical overhead positions identified in the study. Installed in FY 86, this system is patterned after the Department of Labor's Federal Productivity Measurement System, and is designed primarily as a management tool for use in formulating and justifying the Department's budget submission. DVB is refining the system, but until a new system is installed it is not possible to accurately compare relative productivity among stations, especially the two insurance centers where there is a significant difference in the workload mix and the functions performed. For example, the Philadelphia Office handles all of the World War I (USGLI) accounts, all of the accounts that are paid by deductions from military retired pay and VA compensation benefits, the New York State Tax letters, the dividend hoax mail, and performs a whole series of administrative support and finance functions that are not performed by the Insurance Division in St. Paul.

Productivity is an after the fact measurement that does not necessarily reflect a station's ability to produce, but rather what it did produce with a given employment during a given period of time. The current system measures the change over a period of time in the amount of employee resources (FTE) required to produce certain selected groups of end products. The indexes produced by the system do not account for changes that are attributable to training or the use of overtime, nor do they reflect backlogs that occur when staffing falls below the required levels.

Local base year weights are used to reflect the amount of FTE required in the base year to produce 1,000 end products. The different local base year weights developed for both Insurance offices reflect in part the differences in the functions that are performed as well as the difference

3.

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in the types of work performed. The national base year weights represent averages for the two offices. However, national base year weights do not reflect all of the time spent on insurance support activities in Philadelphia and overstate the amount of time spent on insurance support activities in St. Paul where most administrative and finance support functions are performed in other divisions. In using the indexes based on national base year weights, GAO has in effect compared apples to oranges.

In addition, GAO chose a snapshot picture of productivity based on the FY 86 indexes to arrive at its conclusion that Philadelphia would need 28 more people to do the same work that St. Paul is currently doing. The fact of the matter is that both offices have been very productive under the current and previous systems. The conclusion reached by GAO that 28 more employees would be needed in Philadelphia is unsupported by their analysis which used the wrong base year weights, and ignored the varying impact of the FY 86 hiring freeze and early out retirement option which had a direct impact on the work force. In Philadelphia, for example, there were 46 individuals in a full time training status during FY 86 and 78 in full time training status this year.

The GAO findings regarding space costs rest on the supposition that a block of space could be released to the General Services Administration in the Philadelphia building if a consolidation does not occur. Even if GSA is able to find a tenant for that space, GAO neglected to consider the one-time costs which the VA would have to bear to rearrange the entire office to release a contiguous block of space while maintaining an efficient office layout and the security and office integrity required in any operation. In our discussions, the GAO constantly emphasized the need to consider cost to the Government rather than cost to the VA. Yet unless GSA is able to place another tenant if consolidation does not occur, there will be no savings at all and actually result in significant one-time costs to the VA.

In our analysis, the GSA regional officials indicated to us that it was doubtful that the space in Philadelphia could be used by another agency. As recently as July 15, 1987, VA officials again discussed this issue with GSA's Philadelphia Regional Headquarters and were informed that the VA could release the space back to GSA, but GSA would put certain requirements on it that could make it costly to release. For example, any space to be made available to another agency would need to be "accessible and assignable". A GSA representative familiar with the location of the Insurance activity stated that the area that could currently be considered excess is located in a corner of the building that would not be suitable for another agency to occupy. Therefore, GSA would require the VA to reorganize large portions of the work force to free up space in the front portion of the building. Further, he stated that other costly modifications would need to be made and he cited the specific example of the need to build a wall around whatever space the new agency would occupy.

4.

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In addition, when questioned as to the likelihood of obtaining another tenant for the space, even with the above-mentioned modifications, the GSA representative stated that it would be difficult to rent and would "probably be vacant for a long, long time". In light of this, the 27,500 square feet of space that would be used for the consolidated office could theoretically be made available. However, as a practical matter, that does not mean that it can become productive space by releasing it back to GSA. Since the additional staff required by the consolidation is the only realistic way of filling the space in question and it would remain vacant and unproductive without that staff, the stated reduction by $1.0 million in the VA's estimated savings is not likely to occur, as is suggested by the draft report.

We believe that a consolidation will be cost-beneficial and are confident that the estimated personnel savings can be achieved while improving service. We also feel that there are additional economies of scale that can be achieved through consolidation of the Insurance program. Although GAO made no mention of this in the current draft report, the following statement appeared in an earlier report:

> "In addition to achieving the savings identified by our review, we believe that other savings could possibly be achieved in the future because of greater opportunities for increased efficiency and effectiveness from centralizing all insurance field operations at one site." (page 11 of GAO's Report to the Congress on "Savings Available Through Consolidation of Veterans Administration Insurance Field Offices," dated September 29, 1969.)

In conclusion, we do not believe the GAO has found valid reasons for the consolidation not to take place.

Sincerely,

THOMAS K. TURNAGE
Administrator

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