United States Government Accountability Office

Report to the Ranking Member, Committee on Homeland Security, House of Representatives

May 2018

2016 PRESIDENTIAL CAMPAIGN

Actions Needed to Address U.S. Secret Service Overpayments for Travel Costs

GAO-18-419

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GAO Highlights

Highlights of GAO-18-419, a report to the Ranking Member, Committee on Homeland Security, House of Representatives

Why GAO Did This Study

The Secret Service incurs millions of dollars in travel expenses to provide security during the fast-paced operational tempo of a presidential campaign. In connection with the 2016 presidential campaign, the Secret Service provided protection for four presidential candidates, two vice presidential candidates, and six of the candidates' family members.

GAO was asked to review the Secret Service's travel-related expenses for the 2016 presidential campaign. This report examines (1) how much the Secret Service incurred in travel-related expenses, and (2) the extent to which travel-related payments and reimbursements were made in accordance with laws, regulations, and policies. GAO analyzed Secret Service data to determine the travel expenses incurred by the agency for the 2016 presidential campaign. GAO also randomly selected 40 overnight trips to assess the Secret Service's compliance with provisions of its lodging policies and the Federal Travel Regulation. GAO analyzed the Secret Service's payments to campaign committees to determine whether committees were reimbursed the correct amounts for charter flights.

What GAO Recommends

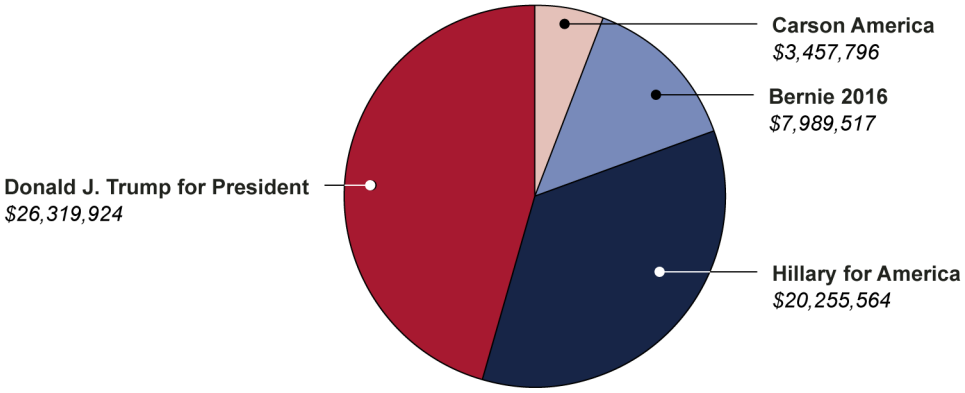
GAO is making five recommendations, including that the Secret Service should (1) calculate its overpayments to the campaign committees for special agents' seats on chartered aircraft flights, and (2) determine how it should proceed with respect to collecting on identified debts. The Department of Homeland Security concurred with the recommendations and identified actions underway to address them.

View GAO-18-419. For more information, contact Diana Maurer at (202) 512-9627 or maurerd@gao.gov.

What GAO Found

The U.S. Secret Service's (Secret Service) travel expenses during the 2016 presidential campaign totaled approximately $58 million. Of the $58 million, $17.1 million was for reimbursements to the four campaign committees for chartered aircraft flights. In the case of campaign travel, Secret Service special agents often fly with protected individuals on aircraft chartered by the campaign committees. The Secret Service reimburses the campaign committees for the number of seats occupied by special agents on board each charter flight.

U.S. Secret Service Travel Expenses for the 2016 Presidential Campaign



Source: GAO analysis of U.S. Secret Service data. | GAO-18-419

For the 40 overnight trips GAO reviewed, the Secret Service generally followed its policies and regulations for lodging payments. However, GAO found that the agency overpaid the campaign committees at least an estimated $3.9 million when reimbursing them for special agents' seats on charter flights. Since at least 1977, the Secret Service's policy has been to pay the lower of two fares when reimbursing campaign committees for special agents' travel on chartered aircraft flights. Specifically, the Secret Service is to pay the lower of the following two fares: the lowest commercially available first-class airfare, or the pro rata fare—the cost of the agent's seat on the charter flight calculated by taking the total cost of the charter divided by the number of passengers on board. However, during the 2016 presidential campaign, Secret Service officials misinterpreted a Federal Election Commission regulation, and as a result, did not conduct the comparison. Instead, the Secret Service solely paid the pro rata fare to the campaign committees. Eight months before the end of the 2016 presidential campaign, Secret Service officials determined the interpretation was erroneous, but did not ensure the agency reverted to its long standing policy. During these 8 months, 66 percent of all campaign-related flights with special agents on board were taken.

Federal agencies are generally required to collect on debts that have been determined by an appropriate official of the federal government to be owed to the United States. Debts include overpayments. Pursuing debt collection, however, will require the Secret Service to calculate the specific amount it overpaid to the campaign committees and determine how to proceed with seeking repayment from the various committees, as appropriate.

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Abbreviations

DHS	Department of Homeland Security
FAA	Federal Aviation Administration
FEC	Federal Election Commission
FMD	Financial Management Division
FTR	Federal Travel Regulation
GSA	General Services Administration
IATA	International Air Transport Association
LRC	Logistics Resource Center

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE
441 G St. N.W.
Washington, DC 20548

May 30, 2018

The Honorable Bennie G. Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

Dear Mr. Thompson:

The U.S. Secret Service (Secret Service), a component within the Department of Homeland Security (DHS), incurs millions of dollars in travel expenses to provide protection during the fast-paced operational tempo of a presidential campaign. The Secret Service is authorized to protect major presidential and vice presidential candidates,[1] and within 120 days of a general presidential election, their spouses.[2] In addition, protection is provided for children or others not specifically identified in statute when directed by the President. Accompanying each protected individual, among others, are special agents who provide 24/7 protection, and advance teams who provide site security. Secret Service special agents often fly with protected individuals on aircraft chartered by the campaign committees and the agency reimburses the committees for the number of seats occupied by special agents on board each charter flight. Candidates often visit multiple cities per day and multiple states per week, and the necessary Secret Service protective assets must always arrive and deploy before each visit.

You requested that we review the Secret Service's travel expenses during the 2016 presidential campaign. Specifically, this report addresses the following questions:

(1) How much did the Secret Service incur in transportation, lodging, and other travel-related expenses when providing protection during the 2016 presidential campaign?

(2) To what extent did the Secret Service reasonably assure that payments and reimbursements for travel-related protection expenses

[1]"Major" presidential and vice presidential candidates are determined by the DHS Secretary after consulting with an advisory committee.

[2]18 U.S.C. § 3056.

were made in accordance with applicable laws, regulations, and policies during the 2016 presidential campaign?

To determine how much the Secret Service incurred in travel-related expenses, we obtained expense data from the Secret Service for the 2016 presidential campaign. Specifically, we reviewed expenses for the 12 protected individuals associated with campaign committees for the following Presidential candidates: Senator Bernie Sanders, Dr. Benjamin Carson, Mr. Donald Trump, and Secretary of State Hillary Clinton. We analyzed the travel expenses incurred by the Secret Service for each of the protected individuals (a total of 12) to determine the total expenses for each campaign committee and for the 2016 presidential campaign as a whole. Additionally, we determined the amount of the total travel-related expenses that were reimbursed to the campaign committees for special agents' seats on aircraft chartered by the committees. We determined that the expense data were sufficiently reliable after, among other things, discussing with Secret Service officials how the data are entered and maintained in the agency's financial systems, reviewing the data for obvious errors and anomalies, and comparing the reimbursement data to data campaign committees reported to the Federal Election Commission (FEC).

To determine the extent to which the Secret Service's payments and reimbursements for travel-related protection expenses were made in accordance with applicable laws, regulations, and policies, we analyzed the Secret Service's lodging payments and charter aircraft reimbursements to the campaign committees. Of the 962 overnight trips taken during the 2016 presidential campaign, we randomly selected 40—10 for each of the 4 presidential candidates—to assess the Secret Service's compliance with its internal lodging policy and select provisions of the Federal Travel Regulation (FTR).[3] Although the results of our analysis are not generalizable to all overnight trips taken during the 2016 presidential campaign, it provided us insight to the Secret Service's compliance with select provisions of its lodging policy and the FTR. With regard to whether the Secret Service reimbursed the four campaign committees the correct amounts for special agents' seats on campaign chartered aircraft, we compared the Secret Service's payments to the committees to the agency's charter aircraft reimbursement policy.[4] To

[3]The FTR is found at 41 C.F.R. chs. 300-304.

[4]U.S. Secret Service, *Methods of Transportation*, FMD-08(04), (November 22, 2011).

estimate whether and, if so, by how much the Secret Service incorrectly paid the campaign committees for special agents' seats on chartered aircraft flights, we selected a generalizable stratified random sample of 650 flight segments from the 2,318 flight segments taken from November 1, 2015 through the end of the 2016 presidential campaign that had an identifiable airport.

To determine whether the Secret Service followed its policy with regard to accepting and reviewing chartered aircraft invoices submitted by the campaign committees, we compared the agency's policy requirements to all 76 invoices submitted by the four campaign committees. Further, we used the *Standards for Internal Control in the Federal Government* to assess whether the Secret Service's requirements for chartered aircraft invoices, and the review of the invoices, are specific enough to help ensure that the Secret Service is making correct reimbursements for chartered aircraft flights.[5] Additional details regarding our scope and methodology are provided in appendixes I and II.

We conducted this performance audit from April 2017 to May 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Authorization of Secret Service Protection during Presidential Campaigns

During the 2016 presidential campaign, a Secret Service detail was to be activated once a candidate for the Office of the President or Vice President requested protection, met the requirements for major candidate status (e.g., entered at least 10 state primaries),[6] and received

[5]GAO, *Standards for Internal Control in the Federal Government,* GAO-14-704G (Washington, D.C., September 2014).

[6]The requirements for major candidate status were outlined in *Advisory Committee Guidelines for Secret Service Protection to Presidential Candidates* (October 2015). These guidelines were updated by DHS in January 2017 to clarify, among other things, that a candidate's request must be in writing and that authorization can also be based on threats to the candidate.

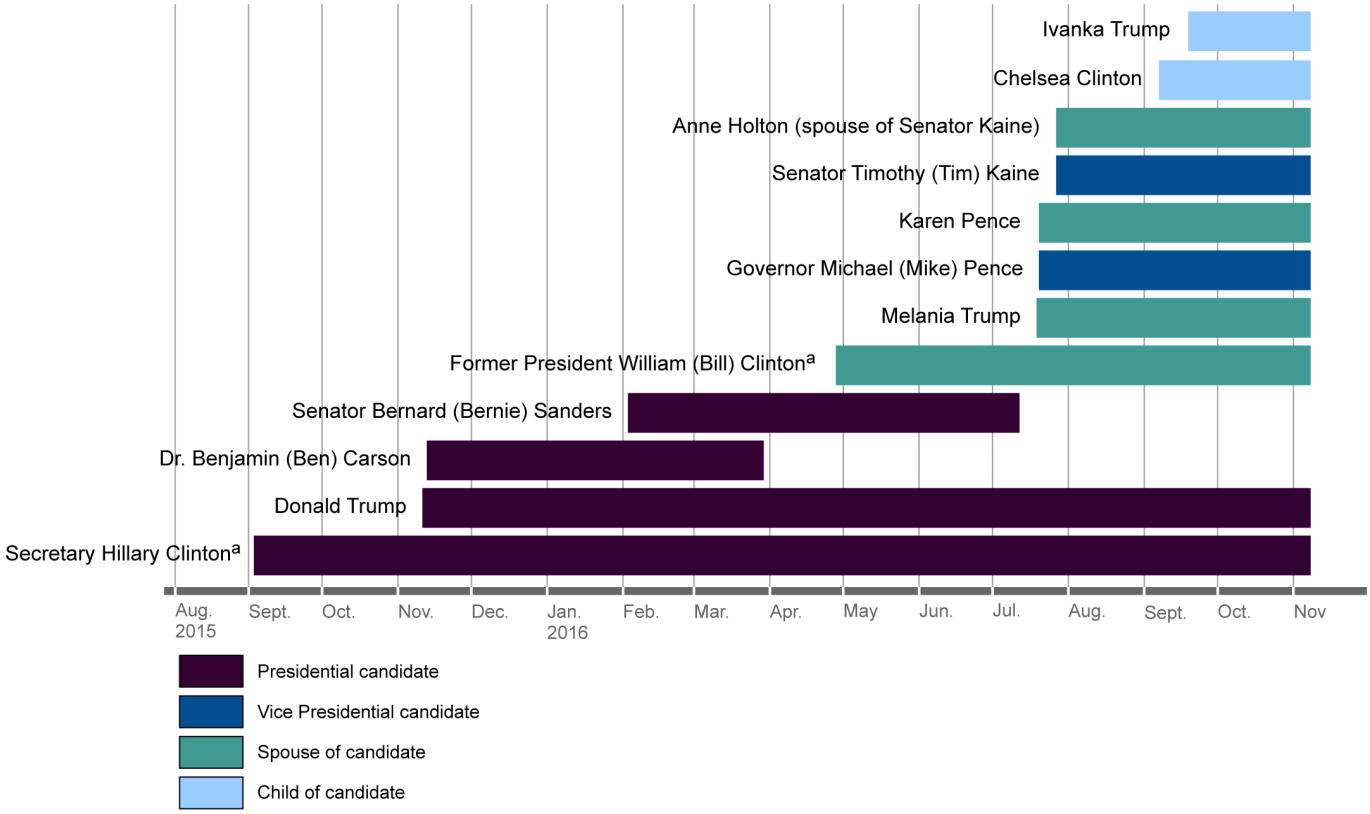
authorization by the Secretary of Homeland Security after consultation with an advisory committee.[7] Under the direction of the Secretary of Homeland Security, the Secret Service is authorized to provide protection for spouses of major presidential and vice presidential candidates within 120 days of the general presidential election.[8] There is no statute that addresses the protection of candidates' children during the campaign. During the 2016 presidential campaign, the Secret Service provided protection for certain children of candidates at the request of the President. According to Secret Service officials, the Secret Service has historically provided protection for individuals not specifically identified in statute when directed by the President.[9] In connection with the 2016 presidential campaign, the Secret Service provided protection for 12 individuals—4 presidential candidates, 2 vice presidential candidates, and 6 of the candidates' family members. Figure 1 below shows the dates of protection through Election Day, November 8, 2016.

[7]The committee consists of the Senate Majority Leader, the Senate Minority Leader, the Speaker of the House of Representatives, the Minority Leader of the House of Representatives, and one additional member to be selected by the other members of the committee. 18 U.S.C. § 3056(a)(7).

[8]18 U.S.C. § 3056(a)(7).

[9]The Departments of the Treasury and Homeland Security General Counsels have taken the position that the Secret Service may provide protection to persons not included within 18 U.S.C. § 3056 when ordered by the President pursuant to the President's constitutional authority. *See, e.g.,* Memorandum for Secretary Shultz, from Edward C. Schmults, General Counsel of the Treasury (Mar. 19, 1974); Memorandum for the Secretary of Homeland Security, from Joe D. Whitley, General Counsel, Dep't of Homeland Security (Apr. 14, 2004); *see also*, Memorandum for the Honorable John W. Dean, III, Counsel to the President, from Ralph E. Erickson, Assistant Attorney General, Office of Legal Counsel (Mar. 27, 1972) (finding that "reasonable arguments can be marshalled in support of the legal authority" to provide protection for public officials absent specific congressional authorization); B-149372, Jan. 28, 1975 (acknowledging but not addressing Treasury's legal view that the President can order protection on a temporary basis to persons not included within 18 U.S.C. § 3056(a)).

Figure 1: Timeline of U.S. Secret Service Protection, 2016 Presidential Campaign



Source: GAO analysis of U.S. Secret Service information. | GAO-18-419

[a]As the former president and first lady, respectively, Bill and Hillary Clinton were receiving Secret Service protection prior to the 2016 presidential campaign. The start dates in the figure reflect when the Secret Service identified them as candidate and spouse.

Role of the Secret Service in Providing Presidential Campaign Protection

Secret Service protective operations have evolved over the years. Originally, protection involved special agents serving as bodyguards. Protection now includes not only special agents in close proximity to the protected individual, but also advance security surveys of locations to be visited, coordination with state and local law enforcement entities, and analysis of present and future threats. Site surveys and threat assessments help the Secret Service determine the resources and assets needed to accompany each candidate and other individuals protected during the presidential campaign. These resources and assets, among other things, generally include:

- special agents who provide 24/7 protection while on detail;

- advance teams who provide site security;
- Explosive Ordnance Disposal and other technical support personnel (e.g., counter-surveillance and counter sniper personnel);
- magnetometer screening capabilities; and
- protective intelligence personnel who investigate threats.

Travel Laws and Regulations

Federal law provides for agencies to pay for or reimburse transportation and lodging expenses for their employees when they are traveling on official business. It further directs the General Services Administration (GSA) to issue regulations governing this travel.[10] The FTR issued by GSA is applicable to Secret Service special agents' transportation and use of hotel rooms when traveling during presidential campaigns to protect candidates and their family members.[11]

Transportation. According to the FTR, coach-class service is to be utilized unless an agency determines that an exception is warranted. For example, an exception may be granted to allow a special agent to use business class accommodations when the protected individual is doing the same and security demands warrant it.[12] In the case of presidential campaign travel, the Secret Service may also accompany protected individuals aboard chartered aircraft.[13] The Secret Service reimburses campaign committees for the seats occupied by its special agents. In 1977, we were asked to review the Secret Service's reimbursement method, and in that decision stated that GAO did not object to the method

[10]5 U.S.C. §§ 5702, 5707.

[11]However, the Consolidated Appropriations Act, 2017, enacted after the time period of our review, provided authority to the Secret Service to pay per diem travel expenses (i.e., lodging, meals, and incidental expenses) of employees on protective missions without regard to GSA's reimbursement rates for federal employee travel. Pub. L. No. 115-31, div. F, tit. II, 131 Stat. 135, 410. This language also appears in the Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, div. F, tit. II.

[12]FTR § 301-10.123.

[13]As used in the report, a chartered aircraft is an aircraft rented in its entirety as opposed to individuals purchasing seats on commercial aircraft.

used by the Secret Service as long as it was used consistently and the amount reimbursed did not exceed the first-class airfare.[14]

Lodging and other use of hotel rooms. The Secret Service utilizes hotel rooms for various purposes when protecting a candidate. The purpose of the room dictates the authority the Secret Service relies on to authorize payment and the related requirements. Hotel rooms used exclusively for special agent overnight sleeping facilities are governed by the FTR. The FTR allows agencies to pay for lodging based on per diem allowances[15] set by GSA for the applicable location and date or the actual expenses of the travel.[16] Actual expense allowance, which can be in excess of the per diem rate, is permitted for a variety of reasons, such as costs escalating due to special events (e.g., sporting events or disasters) or because of mission requirements.[17] However, the maximum amount that an employee may be reimbursed under the actual expense allowance method is limited to 300 percent of the applicable per diem rate.[18]

The Secret Service also utilizes hotel rooms for operational purposes. For example, the Secret Service may use a room as a command center or reserve rooms adjacent to the protected individual to better secure the individual. In addition, to meet operational security demands, the Secret Service may require a certain number of special agents to stay in the particular hotel that the protected individual is staying and within certain

[14]The Secret Service has engaged in this reimbursement practice since at least 1977, when the Comptroller General was asked to review payment to a campaign committee for space occupied by special agents on chartered aircraft. That decision held that "in the absence of any other laws or regulations (and we found none)…the reimbursement method to be used is discretionary with the Secretary of the Treasury [the Secret Service's former department] and [GAO] would not object to the method as long as it is used consistently and does not exceed the first class airfare, which we understand had been the criteria used by the Secret Service in the past." B-130961.141, July 5, 1977. By statute, GAO's authority to adjudicate these kinds of claims was transferred to GSA, among other agencies, in 1996.

[15]The per diem allowance (also referred to as subsistence allowance) is a daily payment instead of reimbursement for actual expenses for lodging, meals, and related incidental expenses. FTR § 300-3.1.

[16]GSA has authority to establish per diem rates for destinations within the lower 48 continental United States and establishes locality-based allowances for these expenses.

[17]FTR § 301-11.300.

[18]FTR §§ 301-11.303, 301-11.305.

proximity to the individual. The legal authorities the Secret Service relies on to pay for these kinds of rooms do not limit how much the agency can pay.[19]

[19]The FTR provides that payment for miscellaneous expenses—including the hire of a conference center or a hotel room for official business—may be made when authorized by the agency and under the agency's governing policy. FTR §§ 301-12.1, 301-70.301. In addition, according to Secret Service counsel, during the 2016 campaign, the Secret Service relied on a 1982 GAO decision that provides that an agency may rent accommodations that cost more than applicable limitations where (a) use of the particular accommodations is an integral part of the employee's job assignment, and (b) failure to provide such accommodations would frustrate the ability of the agency to carry out its statutory mandate. B-209375, Dec. 7, 1982. By statute, GAO's authority to adjudicate these kinds of claims as they relate to lodging rooms was transferred to GSA, among other agencies, in 1996. Following the 2016 presidential campaign, the Consolidated Appropriations Act, 2017 provided authority to the Secret Service to pay per diem travel expenses (i.e., lodging, meals, and incidental expenses) of employees on protective missions without regard to GSA's reimbursement rates for federal employee travel. Pub. L. No. 115-31,131 Stat. at 410. Therefore, since that time, the Secret Service has not been subject to regulatory caps on room rental, regardless of room purpose.

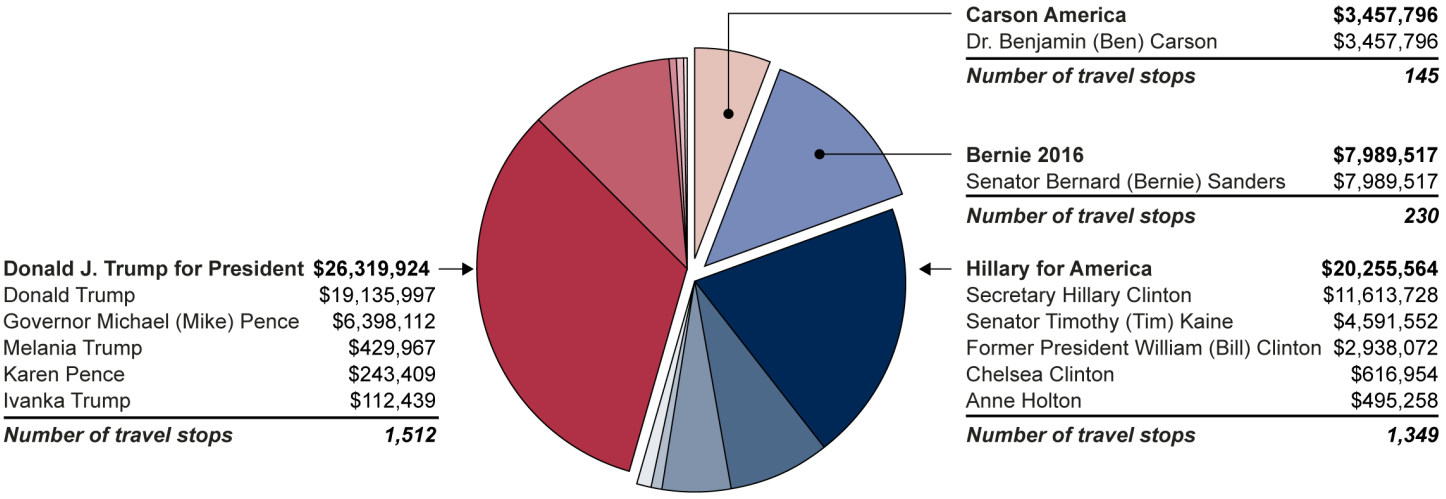
Secret Service's 2016 Presidential Campaign Travel Expenses Totaled Approximately $58 Million, Including $17.1 Million in Reimbursements to the Campaign Committees

The Secret Service's travel expenses for the 12 individuals protected during the 2016 presidential campaign totaled approximately $58 million, according to our analysis of Secret Service data. Travel expenses included airfare, vehicle rentals, hotel rooms, meals and incidental expenses, and baggage charges for special agents accompanying protected individuals.[20] The $58 million in travel expenses was used by the Secret Service to support 3,236 travel stops made by the 12 protected individuals throughout the presidential campaign.[21] The breakdown of these expenses and number of travel stops by campaign committee and protected individual are shown in figure 2 below.

[20]The Office of Management and Budget established a system of object codes to be used when reporting funding obligations (transactions) of items or services purchased by the federal government. See Office of Management and Budget Circular No. A-11, Section 83 (July 2017). Travel expenses include those captured by the Secret Service under object class 21—travel and transportation of persons—and do not include special agents' salaries.

[21]A protective travel "stop" is a single instance (e.g., event attendance, overnight lodging) that a particular protected individual spends within the jurisdiction of a single Secret Service field office. Each jurisdictional change during a trip is considered a separate stop. For example, a candidate could make four travel stops in four different cities within the jurisdiction of different Secret Service field offices during the same day. Each city would count as a travel stop.

Figure 2: U.S. Secret Service Travel Expenses by Protected Individual and Campaign Committee, 2016 Presidential Campaign

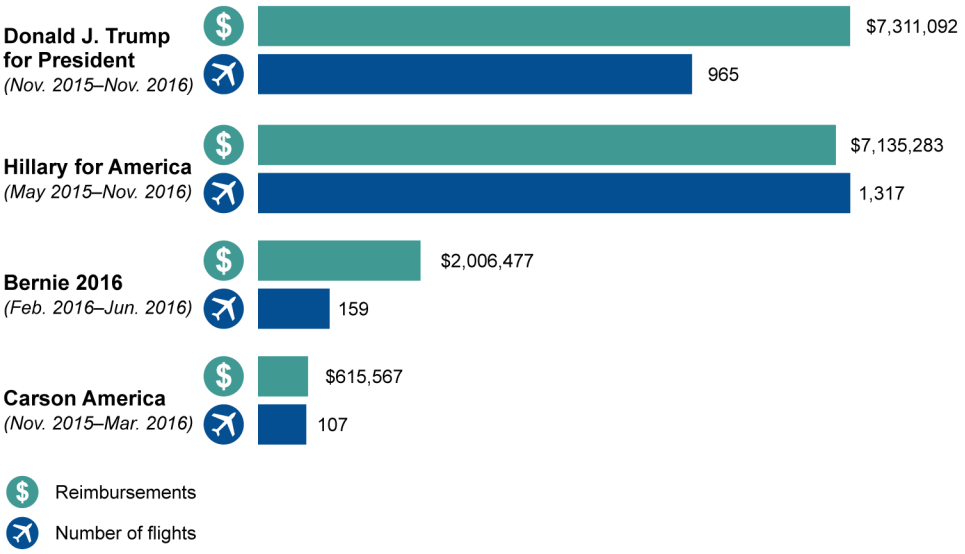


Source: GAO analysis of U.S. Secret Service data. | GAO-18-419

Of the $58 million the Secret Service incurred in 2016 presidential campaign travel expenses, $17.1 million was for reimbursements to the 4 campaign committees for 2,548 chartered aircraft flights.[22] In the case of campaign travel, Secret Service special agents often fly with protected individuals on aircraft chartered by the campaign committees. The Secret Service reimburses the campaign committees for the number of seats occupied by special agents on board each charter flight. Figure 3 below shows the amount and number of flights for which the Secret Service reimbursed each of the campaign committees.

[22]We attempted to determine whether any portion of the Secret Service's reimbursements for chartered aircraft flights were for the use of candidate-owned assets. However, the information we collected from the FEC, Secret Service, and the presidential campaigns was not sufficient to allow us to make such a determination. See appendix I for additional information.

Figure 3: U.S. Secret Service Reimbursements to Campaign Committees for Chartered Aircraft Flights, 2016 Presidential Campaign



Source: GAO analysis of U.S. Secret Service data. | GAO-18-419

Note: The U.S. Secret Service captured all charter flight reimbursements it made to the Hillary for America Committee as a campaign expense regardless of whether special agents were on the flight to protect Secretary Hillary Clinton as the former first lady or as a presidential candidate beginning in September 2015.

Secret Service Did Not Always Follow its Travel Policies, Resulting in Overpayments of at Least an Estimated $3.9 Million

Secret Service Generally Followed its Policies and Applicable Regulations for Lodging Payments during the 2016 Presidential Campaign for the Trips Reviewed

We reviewed special agents' lodging expenses while accompanying individuals protected during the 2016 presidential campaign on 40 randomly selected overnight trips. Our review found that (1) for most trips—30 of 40—the documented hotel expenses were within GSA per diem lodging rates, (2) the Secret Service generally followed its policy of requiring a lodging variance (i.e., waiver) for any hotel rooms exceeding the GSA lodging rate for that location, and (3) the Secret Service did not exceed the maximum amount allowed for lodging for these trips.[23]

The Secret Service required field offices responsible for booking hotel rooms to request and submit a waiver for any room that may exceed the designated GSA lodging rate by any amount.[24] Our review of the receipts for hotel room expenses incurred by the Secret Service found that each trip involved multiple special agents staying in multiple rooms. Specifically, of the 40 trips we reviewed, 30 included hotel rooms that were within GSA lodging rates and 9 included hotel stays exceeding the GSA lodging rate. The Secret Service was unable to locate a hotel bill for 1 trip and we therefore were unable to determine the rate paid for that trip.

In accordance with Secret Service policy, special agents submitted waivers to the agency's Logistics Resource Center (LRC) for all 9 hotel stays exceeding the GSA lodging rate. According to LRC officials, before approving a waiver, they generally wanted to know how many alternative hotels were contacted, whether any hotels were available at or below the GSA lodging rate, and whether staying at a hotel at or below the GSA lodging rate would incur additional expenses that would negate the savings. For example, if a rental vehicle would be required, use and parking of the vehicle may have resulted in total costs that exceeded the price of the more expensive hotel. According to LRC officials, in order to spend travel money judiciously, some special agents stayed at hotels nearby the protected individual's hotel that had rates at or closer to the GSA lodging rate.

[23]The FTR defines lodging as including expenses for overnight sleeping facilities, baths, and personal use of the room during daytime, among other things (but not including lodging taxes). FTR § 300.3.1.

[24]U.S. Secret Service, *Logistics Resource Center Operating Procedures Regarding Lodging*, ADM-06(03), (March 27, 2015).

Examples of Federal Travel Regulation (FTR) actual expense reimbursement method calculations for lodging

General Services Administration (GSA) Established Per Diem Rates

Lodging: $100 per day

Meals and Incidental Expenses (M&IE): $50 per day

Example 1: $400 Maximum FTR Allowance

$100 (GSA lodging rate) + $50 (M&IE rate)= $150 total GSA per diem

$150 (total GSA per diem) X 300 percent = $450 per night allowed for all expenses

Less $50 M&IE allowance

Total maximum FTR allowance for lodging: $400 per night

Example 2: $300 Maximum Allowance Per Department of Homeland Security Policy

$100 (GSA lodging rate) X 300 percent = $300 per night maximum allowance for lodging

Source: GAO. | GAO-18-419

Under the FTR's actual expense reimbursement method, agencies may pay up to 300 percent of the applicable total GSA per diem allowance—the GSA established rates for (1) lodging and (2) meals and incidental expenses—for an employee's daily expenses. However, the agency is to subtract any allowance granted for meals and incidental expenses from the total, with the remainder being available for lodging.[25] DHS and Secret Service policy, however, restricts the 300 percent actual expense allowance for lodging to 300 percent of the GSA lodging rate only.[26] Consistent with DHS and Secret Service policy, none of the hotel rates paid exclusively for lodging in the 40 trips we reviewed exceeded the applicable GSA lodging rate by more than 300 percent.[27] As a result, we determined that the Secret Service's expenditures for lodging for the trips we reviewed were consistent with its policies and applicable regulations.

[25]To calculate the maximum FTR actual expense reimbursement rate for lodging for a given location, the following equation can be used: ([Lodging per diem rate + meals and incidental expenses per diem rate] X 300 percent) – allowance granted for meals and incidental expenses = Maximum dollar amount allowable for hotel lodging under the FTR's actual expense reimbursement method.

[26]For example, if the GSA lodging rate for a location is $100, the maximum the Secret Service would be able to spend is up to $300 (i.e., 300 percent).

[27]According to DHS officials, the Secret Service has the authority to exceed lodging rates set in its policy and the FTR when acquiring space needed to meet operational security standards; for example, Secret Service security standards may require that special agents stay in the particular hotel that the protected individual is staying and within certain proximity to the protected individual. Two trips in our sample included hotel rooms used to meet operational security standards where the protected individual—Secretary Hillary Clinton—stayed. The rooms exceeded the maximum allowed by the Secret Service's policy on rooms to be used exclusively for lodging. However, none of the rooms used to meet operational security standards exceeded the maximum allowed under the FTR's actual expense reimbursement method.

Secret Service Did Not Follow its Policies for Chartered Aircraft Flights and Did Not Thoroughly Review Invoices Prior to Payment

Secret Service Overpaid the Campaign Committees an Estimated $3.9 Million or More for Chartered Aircraft Flights

As discussed earlier, as part of their mission to protect presidential candidates, Secret Service special agents frequently accompany candidates on chartered aircraft provided by the presidential campaigns. The Secret Service is to later reimburse the candidate's campaign committee for the cost of having special agents fly on those planes. The Secret Service's policy for determining the amount to reimburse has been used since at least 1977. Under this policy, the Secret Service is to pay the lower of two applicable fares when reimbursing the campaign committees for special agents' travel on chartered aircraft flights.[28] Specifically, according to the policy the Secret Service is to compare the lowest commercially available first-class airfare[29] for a flight segment (one airport to another airport) to the pro rata fare of the charter (total charter cost divided by the number of passengers). The Secret Service is then to reimburse the campaign committee for the lower of the two fares. The following text box includes an example of the pro rata fare calculation.

Pro rata fare calculation example if two special agents on board charter flight:

$10,000 (total charter flight cost) /10 (total number of passengers) = $1,000 per passenger

$1,000 x 2 special agents = $2,000 owed by the Secret Service to campaign committee

Source: GAO. I GAO-18-419.

In July 2015, an attorney from the law firm representing the Hillary for America Committee sent Secret Service Financial Management Division (FMD) officials an e-mail stating that in their view, the reimbursements for

[28]U.S. Secret Service, *Methods of Transportation*, FMD-08(04), (November 22, 2011). The policy states that it was developed in accordance with guidelines provided in Comptroller General Decision B-130961.141, July 5, 1977.

[29]The lowest commercially available first-class airfare on the date of travel is determined by the Secret Service's travel agency. Commercially available airfare is a fare available to the general public on a scheduled air carrier.

special agents' seats should be the pro rata fare based on an FEC regulation.[30] In response, in August 2015, the Secret Service's Office of the Chief Counsel made a decision to agree with the interpretation of this law firm. As a result, the Secret Service ceased to adhere to its longstanding reimbursement policy and agency officials were directed to use the pro rata calculation method for reimbursing all campaigns for agent airfares. Consequently, the Secret Service did not conduct the comparison between first-class and pro rata fares during the 2016 presidential campaign. Instead, the Secret Service solely paid the pro rata fare to the campaign committees.

In March 2016, in response to a congressional inquiry about presidential campaign charter flight reimbursements, the Office of the Chief Counsel determined that its August 2015 decision was a mistake. Specifically, the Office recognized that the FEC regulation at issue did not apply to the Secret Service's use of chartered aircraft.[31] According to the Office of the Chief Counsel, they notified an official in the Office of Protective Operations, which collects submissions for reimbursements from the protected individual or the related campaign committee. However, the Office of the Chief Counsel did not notify LRC, which is to obtain the first-class airfares for comparison from the Secret Service's travel agency. Further, the Office of the Chief Counsel was uncertain but believed FMD, which issues payments for the flights, was notified. FMD officials told us that they were not notified. As a result, the Secret Service continued to reimburse the campaign committees the pro rata fares for the remainder of the 2016 political campaign (i.e., through mid-November 2016).

Despite being aware of the error for eight months before the end of the 2016 presidential campaign that the pro rata fare should be compared to the lowest available first-class airfare, the Office of the Chief Counsel did not ensure the agency reverted to its long standing policy. During this 8 month period, the Secret Service accompanied protected individuals on

[30]The regulation cited was 11 C.F.R. § 100.93 (FEC requirements related to non-commercial travel).

[31]In issuing a regulation in 1995, the FEC stated that "the amount of reimbursement received from Secret Service and national security personnel is limited by the rules of other federal agencies, not the FEC, and in some cases is not enough to cover the costs of transporting these persons." *See* Public Financing of Presidential Primary and General Election Candidates, 60 Fed. Reg. 31854, 31859 (June 16, 1995). According to a senior attorney from the Secret Service's Office of the Chief Counsel, the Secret Service did not consult with the FEC regarding its interpretation of the FEC regulation.

1,671 (66 percent) of the 2,548 total campaign-related flight segments. As a result of solely reimbursing the pro rata fare instead of reimbursing the lower of the pro rata fare versus the lowest commercially available first-class airfare, we estimate based on our sample of 650 flight segments that the Secret Service overpaid the 4 campaign committees at least $3.9 million for special agents' seats on chartered aircraft.[32]

Federal agencies are generally required to try to collect on debts—including overpayments—they determine are owed to them. A federal debt or claim is any amount of funds that has been determined by an appropriate official of the federal government to be owed to the United States.[33] It includes, without limitation, overpayments.[34] Under the federal debt collection authorities as provided in 31 U.S.C. chapter 37, federal agencies are required to try to collect on claims arising out of their activities. However, they have the authority to compromise (i.e., accept less than full value) claims, or suspend or end collection, such as when

[32]Given issues identified with information on chartered aircraft flights provided by the campaign committees and available historical data on airfares, we were unable to determine the actual amounts that may have been overpaid to each campaign committee for all flight segments. Based on our sample results (650 of 2,318 flight segments), we estimate that the Secret Service overpaid invoices for about 49 percent (+/- 4 percentage points) of flight segments from November 1, 2015 through the end of the campaign, November 8, 2016. See appendices I and II for more information.

[33]31 U.S.C. § 3701(b)(1). The terms "debt" and "claim" are used synonymously in the federal debt collection authorities. *See* 31 C.F.R. § 900.2(a).

[34]31 U.S.C. § 3701(b)(1)(C). The mistakes of federal employees will not bar the federal government from fulfilling its duties to collect claims of the United States. GAO, 3 *Principles of Federal Appropriations Law*, GAO-08-978SP, at 14-75 (Washington, D.C.: September 2008) (citing *Aetna Casualty & Surety Co. v. United States*, 526 F.2d 1127, 1130 (Ct. Cl. 1975), *cert. denied*, 425 U.S. 973 (1976); *Lawrence v. United State*s, 69 Fed. Cl. 550, 557, *aff'd*, 206 Fed. Appx. 993 (2006); *Amtec Corp. v. United States*, 69 Fed. Cl. 79, 88 (Fed. Cl. 2005), *aff'd*, 239 Fed. Appx. 585 (Fed. Cir. 2007) (unpublished)).

the cost of collecting the claim is likely to be more than the amount recovered.[35]

In response to our finding that the Secret Service had overpaid for travel on chartered aircraft, Secret Service officials told us in February 2018 that they planned to take action to determine the overpayment amounts and seek refunds from the campaign committees. In light of the problems we discuss in appendix II regarding information on aircraft flights provided by the campaign committees and available historical data on airfares, Secret Service officials told us they were attempting to calculate the overpayments and would weigh the feasibility and costs of collecting refunds. However, as of April 2018, the Secret Service lacked specific plans, timeframes, and milestones for calculating the amounts of overpayments to the campaign committees and making key decisions on how and the extent to which the Secret Service will proceed with collections. Making such determinations can help ensure the Secret Service is complying with applicable federal law and recovering funds that could be used to support its protective operations or deposited into the general fund of the United States Treasury as appropriate.

Secret Service Did Not Adhere to Its Directive on Policy Revisions

According to Secret Service officials, the decision to change the reimbursement calculation method in August 2015 was inconsistent with the Secret Service's directive on policy revisions. Specifically, the Secret Service's directive on policy revisions states that the "responsible office"—FMD in this case—is accountable for ensuring policies are current and accurate. In addition, this office is to review, research, and revise the policy, if such a revision is deemed necessary.[36] Further, all significantly affected offices and divisions of the Secret Service, including members of the Secret Service's Executive Resources Board, are to be

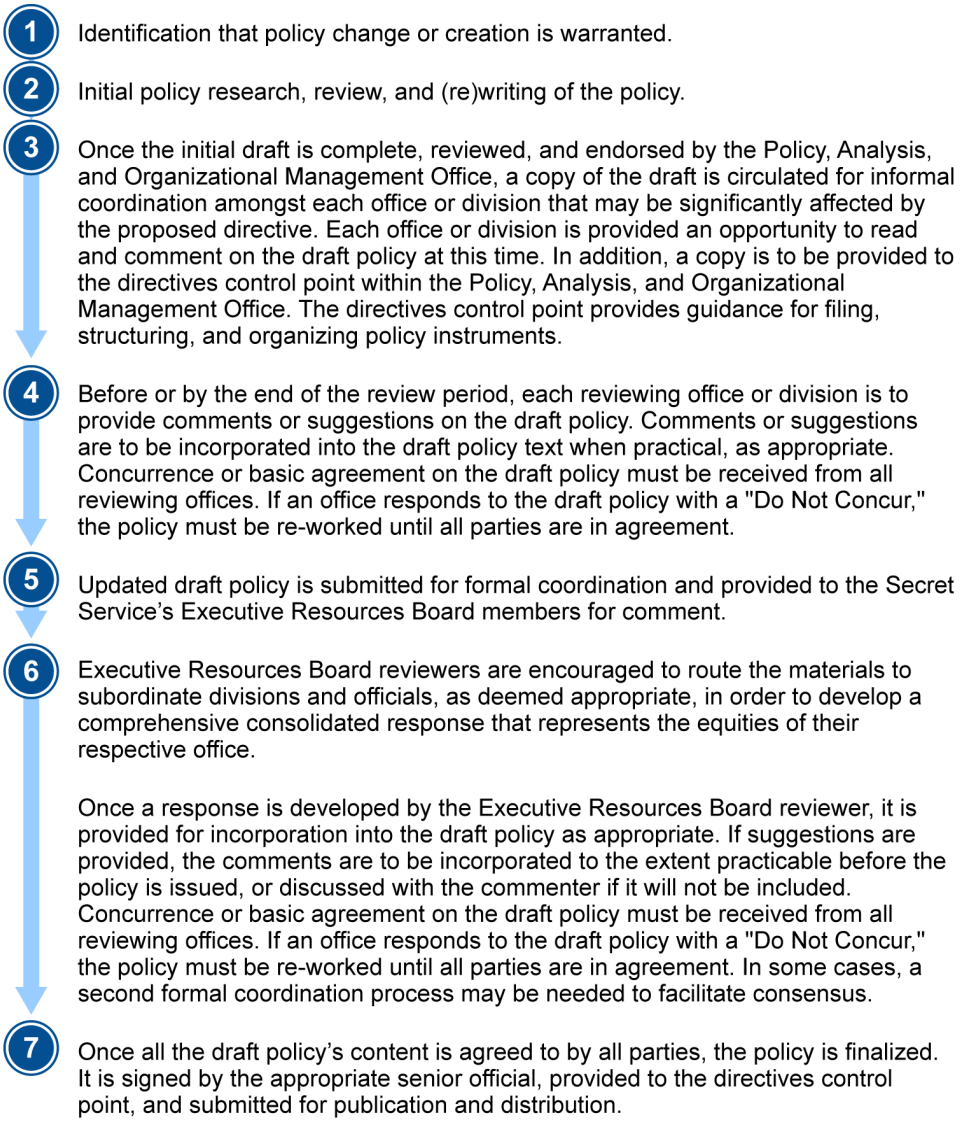
[35]31 U.S.C. § 3711(a). The head of an agency may compromise (i.e., accept less than full value) a claim of up to $100,000 (excluding interest, penalties, and administrative costs), or a higher amount authorized by the Attorney General. Government-wide regulations prescribe standards for federal agencies in the administrative collection, offset, compromise, and the suspension or termination of collection activity, and provide that agencies must aggressively collect all debts arising out of the activities of that agency. 31 C.F.R. §§ 900.1, 901.1(a). In addition to the Federal Claims Collection Standards found at 31 C.F.R. parts 901-04, DHS has issued procedures for the collection of DHS debts at 6 C.F.R. part 11, and section 3.13 of the DHS Financial Management Policy Manual provides guidance for identifying, servicing, collecting, and accounting for non-tax delinquent debt.

[36]U.S. Secret Service, *Creating, Revising and Issuing Policy*, MNO-05(01) (January 29, 2014).

provided the opportunity to read and comment on the changes, among other required actions.[37] See figure 4 for a summary of key steps in the Secret Service's policy creation, revision, and issuance process.

[37]The Executive Resources Board is the final authority over all of the Secret Service's project proposals. It is to ensure: (1) effective planning for and management of resources throughout the Secret Service, (2) that all Secret Service organizations have a voice in the decision-making process, and (3) that decisions best meet the needs of the entire Secret Service. Membership of this board includes the Deputy Director, all Assistant Directors, the Chief Counsel, and the Chief of the Secret Service Uniformed Division.

Figure 4: Summary of Key Steps in the U.S. Secret Service's Policy Creation, Revision, and Issuance Process



Source: GAO analysis of U.S. Secret Service directive *Creating, Revising, and Issuing Policy*, MNO-05(01) (January 29, 2014). I GAO-18-419.

According to Secret Service officials, however, the process outlined in the directive on policy revisions was not followed in August 2015. As a result, the decision to change the reimbursement calculation method was not fully vetted or reviewed by all members of the Secret Service's Executive Resource Board as would be required under the directive on policy

revisions. According to agency officials and confirmed in communications we reviewed, the Office of the Chief Counsel misinterpreted the regulation and directed that the erroneous interpretation be followed. The official leading FMD at the time, who was in the role on a temporary basis, adhered to the Office of the Chief Counsel's interpretation of the regulation because the matter was legal in nature. Agency officials further added that the increased operational tempo (i.e., heavy workload) at the time may have resulted in a failure to adhere to the Secret Service's directive on policy revisions.

An important role within the Secret Service's policy creation and revision process is the directives control point. The directives control point is to help develop and implement policy that is clear, enforceable, and effective. In addition, the directives control point provides guidance for filing, structuring, and organizing policy instruments. *Standards for Internal Control in the Federal Government* states that management should design control activities to achieve objectives and respond to risks.[38] Control activities are the policies, procedures, techniques, and mechanisms that enforce management's directives to achieve the entity's objectives and address related risks. Secret Service officials stated that the agency could better ensure that its existing directive for policy revisions is followed by requiring that its directives control point be notified of any legal advice or direction proposed by the Office of the Chief Counsel that could modify or amend agency policy. By requiring—in policy and practice—that the Secret Service's directives control point be notified when the Office of the Chief Counsel provides advice to offices that is likely to result in policy changes, the Secret Service could better ensure that operational changes inconsistent with existing policy are not made without the full consideration of all affected parties. Moreover, it could reduce errors and the potential for unnecessary costs associated with decisions that do not go through the required review process.

Secret Service Did Not Ensure the Accuracy of Charter Flight Invoices Prior to Reimbursing Campaign Committees

Secret Service policy requires that protected individuals—and by extension their campaign committees—seeking reimbursement for special agents on chartered aircraft flights to submit an invoice with the following information:

(1) Name, address, and bank account information for the protected individual.

[38]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C., September 2014).

(2) Taxpayer Identification Number.

(3) Date(s) of charter.

(4) Itinerary by flight segment (the three letter airport code should be provided for the departure and arrival airports for each segment).

(5) Total aircraft cost per flight segment.

(6) Total number of passengers for each flight segment (to include seats occupied by the Secret Service).

(7) Total number of seats occupied by the Secret Service for each flight segment.[39]

The policy also requires that if an invoice is incomplete or inaccurate that it should be returned to the protected individual within seven days of receipt for completion or correction.

We found that 20 of the 76 invoices submitted to the Secret Service during the 2016 presidential campaign had incomplete or inaccurate information, and therefore should have been returned to the protected individual, or the related campaign committee. The 76 invoices included 2,548 flight segments. Information for 558 (22 percent) of the flight segments was incomplete or inaccurate. However, the Secret Service did not return any invoices to the four candidates or their campaign committees during the 2016 presidential campaign, according to Secret Service officials. Specifically, we found the following instances of incomplete and inaccurate information in the charter flight invoices provided by the campaign committees on behalf of protected individuals to the Secret Service:

- **Airport Code:** The Hillary for America Committee submitted two invoices containing two flight segments missing an airport code. The Carson America Committee submitted one invoice that did not clearly show the destination airport for seven flight segments and one invoice with three flight segments missing an airport code. The Donald J. Trump for President Committee submitted 12 invoices for then-candidate Trump with 336 flight segments missing an airport code. Only a city name with multiple possible airports was listed, leaving it unclear which airport was used. For example, in several instances

[39]U.S. Secret Service, *Methods of Transportation*, FMD-08(04), (November 22, 2011). This policy applies to all individuals protected by the Secret Service and not just those associated with campaign committees.

"New York, NY" was listed, which could be LaGuardia Airport or JFK International Airport.

- **Total Cost or Passengers:** The Donald J. Trump for President Committee submitted 4 invoices for flights taken by Vice Presidential Candidate Mike Pence with 210 flight segments which did not include the total cost or the total number of passengers for each flight segment. The total cost and number of passengers are necessary to verify the pro rata cost of the flight segment.
- **Double Billing:** The Donald J. Trump for President Committee double-billed the Secret Service for three flight segments taken on March 1, 2016 resulting in a cumulative overpayment of approximately $21,000 by the Secret Service for these segments.
- **Other Errors:** The invoices for the Hillary for America Committee had 1 (less than 1 percent) of 1,317 flight segments with a mathematical error; the Donald J. Trump for President Committee had errors on 16 (2 percent) of 965 flight segments; and the Bernie 2016 Committee had errors on 29 (18 percent) of 159 flight segments.[40] These 46 flight segments with mathematical errors resulted in a net Secret Service underpayment to the campaign committees of approximately $63,000.[41]

According to Secret Service officials, although these errors were made by the campaign committees, Secret Service officials failed to detect the errors. Per the Secret Service's reimbursement policy, it is the responsibility of the special agents overseeing the protected individual's travel to review the invoices to ensure they include the required information and the provided information is accurate. The policy further states that absent complete and accurate information, the invoices are to be rejected for correction prior to reimbursement. Based on our review of the invoices, the special agents verified the dates of the flights and number of special agents on board the flight segments included in the invoices, but did not, for example, reject invoices that did not contain the three letter airport code or total number of passengers. According to Secret Service officials, the incomplete invoices should have been rejected, but were not because of the operational tempo associated with

[40]The Carson America Committee had no mathematical errors in any of its invoices.

[41]The $63,000 underpayment is based on the Secret Service paying the pro rata fares billed by the campaign committees and does not take into account that, as previously discussed, the Secret Service should have compared the pro rata fare to the lowest available first-class airfare.

the presidential campaign. As discussed earlier, operational tempo was also a rationale provided by Secret Service officials for why they did not adhere to the directive on policy revisions. *Standards for Internal Control in the Federal Government* states that management should design control activities to achieve objectives, such as compliance with policies.[42] In addition, the standards suggest that agency management should evaluate excessive pressure on personnel and help personnel fulfill their assigned duties. To help ensure that the Secret Service is adhering to its travel policies, the Secret Service may need to assess its existing control activities and determine how they can be enhanced to address the fast-paced operational tempo of presidential campaigns.

Further, according to FMD officials, when invoices marked certified reached FMD for payment, it was assumed by FMD that the invoices had been certified as complete and accurate, as indicated by the signature of a special agent or an authorized certifying officer. Secret Service policy does not assign responsibility for verifying the accuracy of the pro rata fare and checking that flight segments have not already been billed. Additionally, for three of the four campaign committees, the Secret Service had no assurance when paying the pro rata fare that it was being charged its share correctly since it did not receive copies of the charter companies' invoices. Specifically, the Secret Service relied on invoices created by the campaign committees for reimbursement purposes without supporting receipts, invoices, or other documentation to verify the charges against. According to Secret Service officials, only the Hillary for America Committee forwarded copies of invoices from the charter companies it used, allowing the Secret Service to verify the accuracy of the amounts billed. The Secret Service policy on reimbursement of chartered aircraft flights does not require that copies of charter company invoices or receipts be forwarded by the protected individual or their campaign committee.

Standards for Internal Control in the Federal Government states that management should design control activities to achieve objectives and respond to risks.[43] Such activities include proper execution of transactions (e.g., assuring that only valid transactions are entered into) and controls over information processing (e.g., comparing charter flight invoices to the

[42]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C., September 2014).

[43]GAO-14-704G

amounts billed to the Secret Service by the campaign committees). Secret Service officials agreed that the accuracy of flight segment details and costs should be verified prior to reimbursing for charter flights. In addition, they further agreed that responsibility for verifying the accuracy of the pro rata fare and checking that flight segments have not already been billed should be assigned. They also agreed that the Secret Service should require the charter companies' invoices to verify that the campaign committees are correctly charging the Secret Service for its share of the total flight cost.

Without updating its charter aircraft reimbursement policy, the Secret Service does not have reasonable assurance that correct payments will be made. These changes include: (1) assigning responsibility for verifying that all calculations done by the campaign committees on behalf of the protected individual are accurate, (2) requiring a secondary review process to confirm the accuracy of charter flight costs prior to making payment, and (3) requiring that copies of charter companies' invoices be provided to ensure that the reported pro rata costs are accurate prior to reimbursement. In response to our finding, in February 2018 the Secret Service began drafting an initial version of proposed policy changes, consistent with its directive on revising policy.[44] Specifically, Secret Service officials started initial policy research and began reviewing and drafting the policy, consistent with step two of their policy revision process (see figure 4). However, several additional steps remain to be completed before the planned changes are implemented. Until the Secret Service completes all the necessary steps to update its charter aircraft reimbursement policy, it remains at risk for making incorrect payments.

Current Policy Does Not Ensure Correct Reimbursements for Chartered Aircraft Flights

Secret Service's charter aircraft reimbursement policy does not specify whether its travel agency is to include taxes when identifying the lowest available first-class airfare. As discussed earlier, Secret Service is to pay the lower of two applicable fares (lowest available first-class fare, and the pro rata fare) when reimbursing the campaign committees for special agents' travel on chartered aircraft flights. The Secret Service obtains the lowest available first-class airfare from its travel agency. LRC officials initially told us that the Secret Service's travel agency had been including taxes in the lowest available first-class airfare. However, after inquiring with the travel agency, an LRC official learned that taxes had not been

[44]U.S. Secret Service, Creating, Revising and Issuing Policy, MNO-05(01) (January 29, 2014).

included. After further discussion with us, Secret Service officials told us that taxes should be included.[45]

Including taxes can make the difference between a first-class airfare being less or more expensive than the pro rata fare for a charter flight, therefore dictating which fare the Secret Service should reimburse the protected individual and campaign committee. For example, if a pro rata fare costs $1,000, and the lowest available first-class airfare (without taxes) is $950, then the lower fare is the first-class airfare. However, if the lowest available first-class airfare (with taxes) is $1,050, then the lower fare is the pro rata fare.

The Secret Service's policy on reimbursement of special agents' seats on chartered aircraft also lacks important details to ensure that its travel agency can accurately identify the lowest available first-class airfares and make accurate reimbursements.[46] The policy requires the protected individual to provide the Secret Service the 3-letter airport code for the departure and arrival airports for each flight segment for which it is seeking reimbursement. However, it does not specify that the 3-letter airport code needs to be the International Air Transport Association (IATA) code and not the Federal Aviation Administration (FAA) code.[47] Airports in different countries can have the same IATA and FAA codes. Providing the FAA code can result in the Secret Service's travel agency identifying the wrong airport when determining the lowest first-class airfare for a travel segment since the travel agency searches IATA codes. For example, when we asked the Secret Service's travel agency to research the lowest available first-class airfare for campaign travel segments based on the reported destination codes in campaign committee invoices the travel agency identified "SGJ" as Sagarai, Papua New Guinea based on the IATA code. However, SGJ is the FAA code for the Northeast Florida Regional Airport. Similarly, another reported destination code in a campaign committee's invoice, LOM, is the FAA code for Wings Field Airport, Pennsylvania and is also the IATA code for

[45]Based on the Secret Service's official decision that taxes should be included when identifying the lowest available first-class airfare, we included taxes when determining the Secret Service's overpayment to the four campaign committees.

[46]U.S. Secret Service, *Methods of Transportation*.

[47]Airports around the world are commonly identified by three and four letter codes. These codes are assigned by IATA, the International Civil Aviation Organization, the FAA, and other civil aviation organizations. IATA uses 3-letter codes for airline operations, baggage routing, and ticketing.

Lagos de Moreno, Colombia. Since the travel agency searches on the basis of IATA codes, using FAA codes that are designated as foreign destinations in the IATA system can result in confusion for the travel agency when identifying the lowest available first-class airfare for a flight segment.

Secret Service officials told us that they had not considered specifying whether the lowest first-class airfares should include taxes since the Secret Service had been using the same representative at its travel agency since 1986 to identify the lowest available first class fare. They said they assumed that their representative knew the policy through practice. Also, Secret Service officials told us that they were not aware of the difference between IATA and FAA codes. Secret Service officials agreed that the reimbursement policy should be revised to make it clear that taxes are to be included when the Service's travel agency identifies the lowest available first-class airfare when determining the correct reimbursement amount, and that protected individuals are to provide the IATA code for airports.

Standards for Internal Control in the Federal Government states that management should internally and externally communicate the necessary information to achieve the entity's objectives and that effective information and communication are vital for an entity to achieve its objectives.[48] The Secret Service could better ensure that its travel agency is able to identify the lowest commercially available first-class airfare for comparison to the pro rata fare by updating its charter aircraft reimbursement policy to specify that (1) taxes are to be included in the lowest commercially available first-class airfare, and (2) protected individuals' invoices include the IATA airport codes for arrival and departure airports. In response to our finding, in February 2018 the Secret Service started to draft an initial version of proposed changes to its charter aircraft reimbursement policy, consistent with its directive on revising policy. Secret Service officials were in the process of conducting initial policy research, reviewing, and drafting the policy, consistent with step two of their policy revision process (see figure 4). However, the Secret Service needs to complete several additional steps before the planned changes go into effect. Until then, the Secret Service remains at risk of not correctly identifying the lowest applicable airfare.

[48]GAO-14-704G

Conclusions

The Secret Service plays a vital role in protecting our nation's leaders, including presidential and vice presidential candidates, and their family members. During the 2016 presidential campaign, for the trips we reviewed, the Secret Service generally followed its internal policies and federal regulations governing payment for lodging costs incurred while protecting candidates. However, due to an erroneous legal decision in August 2015, the Secret Service did not follow its reimbursement policy for chartered aircraft during the campaign. By not adhering to its policy, the Secret Service overpaid campaign committees at least an estimated $3.9 million dollars for charter flights. Until the Secret Service determines the amounts owed and how it will proceed with seeking repayment from the various campaign committees, these funds will not be recovered by the federal government.

Further, in making the erroneous legal decision in August 2015, the Secret Service did not adhere to its directive on policy revisions. The decision to effectively change a policy was not fully vetted, reviewed, or communicated in accordance with the directive. This was largely due to the lack of a requirement to notify the directive control point when legal decisions are made that can result in policy changes. This could result in similar policy changes not being reviewed in the future.

Finally, presidential campaigns create a fast-paced operational tempo at the Secret Service, and according to agency officials, this tempo contributed to their failure to comply with travel policies during the 2016 presidential campaign. Until Secret Service evaluates the pressure caused by this tempo and implements appropriate mechanisms, it cannot ensure that agency officials responsible for travel reimbursements are complying with policy during presidential campaigns. In addition, Secret Service's charter aircraft reimbursement policy does not assign primary and secondary reviews of invoices provided by campaign committees. The policy also does not require that campaign committees and the agency's travel agency provide all the information necessary to verify the accuracy of the invoices. Without these requirements, Secret Service may continue to reimburse campaign committees incorrect amounts.

Recommendations for Executive Action

We are making the following five recommendations to the Director of the Secret Service.

Consistent with the federal debt collection authorities as provided in 31 U.S.C. chapter 37, the Director should complete the process of calculating the amounts of its overpayments to the campaign committees

for special agents' seats on chartered aircraft during the 2016 presidential campaign, and determine how it should proceed with respect to collecting on identified debts. (Recommendation 1)

To help ensure that the agency's existing directive on policy revisions is followed, the Director should require in policy and practice that the directives control point be notified when the Office of the Chief Counsel provides advice to offices that is likely to result in policy changes. (Recommendation 2)

The Director should assess its existing control activities and implement appropriate mechanisms to help ensure compliance with the agency's travel cost policies during presidential campaigns. (Recommendation 3)

The Director should update the charter aircraft reimbursement policy to assign the offices responsible for verifying that all calculations done by the campaign committees are accurate, and require a secondary review process prior to making payment. (Recommendation 4)

The Director should update the charter aircraft reimbursement policy to specify that protected individuals are to provide IATA codes and copies of the charter companies' invoices, and that the Secret Service's travel agency is to provide lowest available first-class airfares that include taxes. (Recommendation 5)

Agency Comments

We provided a draft of this report for review and comment to DHS, GSA, and FEC.

DHS provided written comments, which are reproduced in appendix III. In its comments, DHS concurred with our recommendations. DHS also stated it had taken or planned to take actions to address all five of our recommendations. In addition, after we provided this report to DHS for comment, Secret Service provided us documentation, including a revised travel policy, highlighting actions they have taken to address our recommendations. We will review the documentation and take steps to close the recommendations in the future, as appropriate.

DHS and FEC provided technical comments, which we incorporated as appropriate. GSA and FEC did not provide written comments.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 1 day from the report date. At that time, we will send copies to the Secretary of Homeland Security, Administrator of the General Services Administration, and Staff Director of the Federal Election Commission. In addition, the report will be available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-9627 or maurerd@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

Sincerely yours,

Diana Maurer
Director
Homeland Security and Justice

Appendix I: Objectives, Scope and Methodology

This report addresses the U.S. Secret Service's (Secret Service) 2016 presidential campaign travel expenses and payment of those expenses. Specifically, our objectives were to examine the following questions:

(1) How much did the Secret Service incur in transportation, lodging, and other travel-related expenses when providing protection during the 2016 presidential campaign?

(2) To what extent did the Secret Service reasonably assure that payments and reimbursements for travel-related protection expenses were made in accordance with applicable laws, regulations, and policies during the 2016 presidential campaign?

To determine how much the Secret Service incurred in travel-related expenses, we obtained expense data from the Secret Service for each of the individuals protected for the 2016 presidential campaign. In total, the Secret Service protected 12 individuals associated with 4 campaign committees (see table 1 below).

Table 1: U.S. Secret Service Protected Individuals by Campaign Committee, 2016 Presidential Campaign

Campaign committee	Presidential candidate	Vice presidential (VP) candidate	Spouse of presidential candidate	Spouse of VP candidate	Child of presidential candidate
Bernie 2016	Senator Bernie Sanders	—	—	—	—
Carson America	Dr. Benjamin Carson	—	—	—	—
Donald J. Trump for President	Donald Trump	Governor Mike Pence	Melania Trump	Karen Pence	Ivanka Trump
Hillary for America	Secretary Hillary Clinton	Senator Tim Kaine	former president Bill Clinton	Anne Holton	Chelsea Clinton

Source: GAO analysis of U.S. Secret Service information. I GAO-18-419.

We analyzed the travel expenses for each of these protected individuals to determine the total travel expenses incurred by the Secret Service for each campaign committee and for the 2016 presidential campaign as a whole. Travel expenses include those captured by the Secret Service under object class 21—travel and transportation of persons.[1] Object class 21 expenses include airfare, vehicle rentals, hotel rooms, meals and

[1]The Office of Management and Budget established a system of object codes to be used when reporting funding obligations (transactions) of items or services purchased by the federal government. See Office of Management and Budget Circular No. A-11, Section 83 (July 2017).

incidental expenses, and baggage charges for special agents accompanying protected individuals. Additionally, we determined the amount of the total travel-related expenses that were reimbursements to the campaign committees—all of which were for special agents' seats on campaign chartered aircraft.

To assess the reliability of the Secret Service's expense data, we discussed with the Secret Service officials how the data are entered and maintained in the Secret Service's official financial system of record—Travel Manager, Oracle, PRISM, Sunflower system—which is used to track operating and travel expenses, among other things. We also reviewed the data for any obvious errors and anomalies. We compared the data to the invoices the Secret Service received from the campaign committees seeking reimbursements in order to verify the amounts the campaigns were reimbursed. Further, we compared the Secret Service's reimbursement data to data the campaign committees reported to the Federal Election Commission (FEC) on payments they received from the Secret Service. As a result, we determined that the expense data were sufficiently reliable for reporting the Secret Service's total travel expenses, expenses broken out by campaign committee and protected individual, and the portion of expenses that were reimbursements to the committees.

To determine the number of travel stops made by the campaign committees for which the Secret Service provided protection, we used data from the Secret Service's Agent Manpower Protection System. To assess the reliability of these data, we reviewed responses provided by the Secret Service on how the data are entered and maintained in the system. We further matched a sample of the travel stops data to hotel bills for those stops. As a result, we determined that the data on travel stops were sufficiently reliable for reporting the total number of travel stops made during the campaign and number of stops per campaign committee.

To determine whether the campaign committees charged the Secret Service appropriate rates for the use of candidate-owned assets, we tried to identify whether any portion of the Secret Service's reimbursements to the campaign committees were for the use of candidate-owned assets. Candidates flew on various types of charter aircraft, including jets and helicopters. Pursuant to law and FEC regulations, campaign committees must report and maintain certain information regarding the use of these

aircraft.[2] However, this information was not sufficient for us to determine whether aircraft for which the Secret Service provided reimbursement were owned by candidates.[3] Further, the Secret Service does not collect information about a campaign's use of candidate-owned assets, including aircraft. We contacted all four campaign committees using various methods, including email, phone, and in-person visits to identify reimbursements received for candidate-owned assets, but none of the committees responded to our questions. As a result, we were unable to determine whether any portion of the Secret Service's reimbursements were for the use of candidate-owned assets.

To determine the extent to which the Secret Service's payments and reimbursements for travel-related protection expenses were made in accordance with applicable laws, regulations, and policies, we analyzed the Secret Service's lodging payments and charter aircraft reimbursements. Of the 962 overnight trips taken during the 2016 presidential campaign, we randomly selected 40—10 for each of the presidential candidates—to assess the Secret Service's compliance with (1) its internal policy requiring a waiver when a hotel room exceeds the General Services Administration (GSA) per diem rate by any amount,[4] and (2) provisions of Federal Travel Regulation (FTR) that limit hotel spending to 300 percent of the GSA rate.[5] To determine the GSA per diem lodging rate, we reviewed the GSA rates applicable on the date of the hotel stay and for that location. If the amount of the room exceeded the GSA rate we identified whether the Secret Service had a waiver for the trip and also checked whether the amount paid exceeded the

[2]The FEC is responsible for administering federal election campaign laws, including the Federal Election Campaign Act of 1971, as amended. The Act and FEC regulations impose requirements related to campaign contributions and reporting.

[3]For example, information on disbursements that campaign committees must submit to FEC is not required to contain information sufficient to determine whether an expenditure was made for use of a candidate-owned aircraft nor is it required to contain information on itineraries or persons on board the aircraft, such as Secret Service special agents. *See* 52 U.S.C. § 30102; 11 C.F.R. §§ 102.9(b) (disbursements generally), 100.93(i) (reporting on disbursements and contributions for use of non-commercial aircraft).

[4]GSA has authority to establish per diem rates for destinations within the lower 48 Continental United States and establishes locality-based allowances for these expenses. The per diem allowance (also referred to as subsistence allowance) is a daily payment instead of reimbursement for actual expenses for lodging, meals, and related incidental expenses. FTR § 300-3.1.

[5]FTR §§ 301-11.303, 301-11.305.

maximum amount available for lodging under Department of Homeland Security (DHS) and Secret Service policy and under the FTR. The time and effort associated with collecting trip bills from many field offices were primary considerations in determining the number of candidates' trips to review. The Secret Service's retention of hotel bills is decentralized; that is, the field office responsible for the geographic area where the protective operation occurs retains hard copies of the bills. Although the results of our analysis are not generalizable to all overnight trips taken during the 2016 presidential campaign, it provided us insight to the Secret Service's compliance with its lodging policy and the FTR.

With regard to whether the Secret Service reimbursed the four campaign committees the correct amounts for special agent travel on campaign chartered aircraft, we compared the Secret Service's payments to the committees to our estimate of what the Secret Service would have paid had its own charter aircraft reimbursement policy been followed.[6] We determined the Secret Service did not use the correct reimbursement method throughout the 2016 presidential campaign. To determine whether the Secret Service followed its directive on the review and approval of policy changes, we compared the steps required to effect a change in policy to the steps taken by the Secret Service when its reimbursement method was altered.[7]

To estimate whether and, if so, by how much the Secret Service overpaid the campaign committees for special agents' seats on chartered aircraft flights based on the reimbursement policy change mentioned above, we selected a generalizable stratified random sample of 650 flight segments from the 2,318 flight segments taken from November 1, 2015 through the end of the 2016 presidential campaign that had an identifiable airport. Appendix II provides further technical details on the statistical methods we used. To determine whether the Secret Service should try to collect on the overpayments to the campaign committees, we reviewed relevant federal authorities, including 31 U.S.C. chapter 37.

To determine whether the Secret Service followed its policy with regard to accepting and reviewing chartered aircraft invoices, we compared all 76 invoices submitted by the four campaign committees to the agency's

[6]U.S. Secret Service, *Methods of Transportation*, FMD-08(04), (November 22, 2011).

[7]U.S. Secret Service, *Creating, Revising and Issuing Policy*, MNO-05(01) (January 29, 2014).

policy requirements for invoice completeness and accuracy.[8] Further, we used *Standards for Internal Control in the Federal Government* to assess whether the Secret Service's requirements for charter aircraft invoices, and the review of the invoices, are specific enough to help ensure that the Secret Service is making correct reimbursements for charter aircraft flights.[9]

We conducted this performance audit from April 2017 to May 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

[8]U.S. Secret Service, *Methods of Transportation*.

[9]GAO, *Standards for Internal Control in the Federal Government,* GAO-14-704G (Washington, D.C., September 2014).

Appendix II: Analysis of a Stratified Random Sample of Flight Segments for GAO's Overpayment Analysis

To estimate whether and, if so, by how much the U.S. Secret Service (Secret Service) overpaid the campaign committees for special agents' seats on chartered aircraft flights, we selected a generalizable stratified random sample of flight segments from campaign invoices sent to the Secret Service. Specifically, we selected 650 flight segments from the 2,318 flight segments taken from November 1, 2015 through the end of the 2016 presidential campaign that had an identifiable airport.[1] We stratified the population of 2,318 flight segments into 11 mutually exclusive strata by campaign (Trump, Clinton, Sanders, and Carson) and three size categories based on the number of special agents that indicated being on board a flight. We chose to stratify based on the number of special agents on board to minimize the variance of the total cost within each stratum in an attempt to gain statistical efficiency in the sample design.

The sample size of 650 flight segments was based primarily on available resources to have the Secret Service's travel agency extract cost data from the airfare database. We allocated the sample of 650 flight segments to the 11 strata using proportional allocation within each campaign.[2] We then adjusted the allocation in each stratum in an attempt to match a Neyman allocation method that would minimize the variance of an estimate of total cost. We randomly selected the allocated sample size of flight segments within each of the 11 strata.

For each of the 650 flight segments selected in the sample, we obtained two measures of the lowest first-class airfare from the Secret Service's travel agency, one with fees and taxes and one without (base fare). This was due to some confusion at the Secret Service about whether taxes and fees should be included when determining the lowest first-class airfare. We then compared these first-class airfares to the individual fare (i.e., the pro rata fare) paid by the Secret Service to the campaign committees. We classified a flight segment as overpaid if the lowest first-

[1]The timeframe was defined by the Secret Service's travel agency's ability to identify the lowest first-class airfare. The database used by the travel agency contains airfares only for the rolling two year period preceding a current date. In our initial testing of the data, we found that some of the airport codes for flight segments were missing, invalid or a code not recognized by the travel agency's database. We identified the correct airport code when possible and eliminated those segments with airports we could not identify prior to selecting our sample.

[2]This stratification resulted in 11 strata rather than 12 because the Carson America campaign did not have any flight segments with 10 or more Secret Service special agents on board.

class airfare was less than the pro rata fare paid by the Secret Service. To determine the total amount of overpayment per flight segment, we multiplied the difference between the pro rata fare paid by the agency and the lowest first-class airfare by the number of Secret Service special agents on board the flight. We assigned flight segments that were classified as not overpaid a total overpaid value of zero.[3]

From our sample of 650 flight segments, we identified 295 flights for which the Secret Service overpaid a total of about $1.5 million.[4] To estimate the proportion of overpaid flight segments and the total amount overpaid by the Secret Service for all 2,318 flight segments in the population from which we sampled, we weighted the sample results by the inverse of the probability of selection based on the stratified sample design. We used estimation methods appropriate for a stratified random sample design and generated 95 percent confidence intervals for each estimate. Because we followed a probability procedure based on random selections, our sample is only one of a large number of samples that we might have drawn. Since each sample could have provided different estimates, we express our confidence in the precision of our particular sample's results as a 95 percent confidence interval (e.g., plus or minus 7 percentage points). This is the interval that would contain the actual population value for 95 percent of the samples we could have drawn. As a result, we are 95 percent confident that each of the confidence intervals in this report will include the true values in the study population. The weighted percentage estimates of the full population from our sample have margins of error at the 95 percent confidence level of plus or minus 4 percentage points or fewer and the estimate of the total amount overpaid by the Secret Service has a relative error of plus or minus 12 percent of the estimate or less.

Based on these results, we estimate that total overpayments in the population of 2,318 flight segments from November 1, 2015 through the end of the campaign would be at least $3.9 million. We estimate that the Secret Service overpaid invoices for about 49 percent (+/- 4 percentage

[3]The Secret Service's travel agency was unable to determine the lowest first-class airfares for 79 of the 650 flight segments selected in the sample. To ensure that we did not overestimate the proportion of overpaid flight segments or the total amount overpaid by the Secret Service, we classified all 79 of these flight segments as not being overpaid and assigned a total overpaid value of zero in our analysis.

[4]These sample results are based on the lowest first-class airfare including taxes and fees since, after consideration, Secret Service officials told us that taxes should be included.

points) of the flight segments. The estimated $3.9 million represents the lower bound of the 95 percent confidence interval of the estimated total dollar amount overpaid based on our sample. The lower bound represents relative error of about 12 percent.

Appendix III: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528

Homeland Security

May 14, 2018

Diana Maurer
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management's Response to Draft Report GAO-18-419, "2016 PRESIDENTIAL CAMPAIGN: Actions Needed to Address U.S. Secret Service Overpayments for Travel Costs"

Dear Ms. Maurer:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

Providing candidate protection during presidential campaigns is one of the more challenging endeavors undertaken by the Secret Service. The consistently high-operational tempo, including extensive travel, long hours, and constantly changing candidates' schedules, presents a unique challenge to all segments of the workforce. Special Agents assigned to protective details and advance work spend weeks on the campaign trail without coming home. Uniformed Division officers regularly screen tens of thousands of attendees to secure venues at campaign rallies. Administrative, Professional, and Technical employees provide critical logistical, information technology, and communications support. As campaigns become longer, events grow larger, and the pace of travel accelerates, so too do the demands on the men and women of the Secret Service. DHS is incredibly proud of how the Secret Service operated during the 2016 campaign.

The draft report contained five recommendations with which the Department concurs. Attached find our detailed response to each recommendation. Technical comments were previously provided under separate cover.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free contact me if you have any questions. We look forward to working with you in the future.

Sincerely,

JIM H. CRUMPACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Attachment

2

Attachment: Management Response to Recommendations Contained in GAO-18-419

GAO recommended that the Director of the Secret Service should:

Recommendation 1: Complete the process of calculating the amounts of its overpayments to the campaign committees for special agents' seats on chartered aircraft during the 2016 presidential campaign, and determine how it should proceed with respect to collecting on identified debts.

Response: Concur. Secret Service, Office of the Chief Financial Officer (OCFO) Financial Management Division (FMD) staff completed preliminary cost comparisons and determined the approximate amount overpaid to each campaign committee. The Office of Chief Counsel (LEG) then drafted letters, signed and sent by the Chief Financial Officer (CFO), to each campaign committee requesting repayment for the overpayment by May 31, 2018. CFO is continuing its analysis to ensure that all taxes and fees related to these flights have been considered and will address any billing adjustments, as appropriate, in the course of follow-up with the individual campaign committees. Estimated Completion Date: June 30, 2018.

Recommendation 2: Require in policy and practice that the directives control point be notified when the Office of the Chief Counsel provides advice to offices that is likely to result in policy changes.

Response: Concur. The Secret Service LEG and the Office of Strategic Planning and Policy (OSP) created and published a specific policy section in the Secret Service Directives System, titled "Reflecting Legal Advice/Opinion in Agency Policy," effective April 27, 2018 (LEG-03) to address this recommendation. LEG-03 requires the Chief Counsel's office to notify the Directives Control Point in OSP when legal advice or opinions they have given to a directorate are likely to result in policy changes. This will help ensure that they agency's existing direction on policy revisions is followed. A copy of LEG-03 was provided to GAO under separate cover. We request that GAO consider this recommendation resolved and closed as implemented.

Recommendation 3: Assess its existing control activities and implement appropriate mechanisms to help ensure compliance with the agency's travel cost policies during presidential campaigns.

Response: Concur. The FMD and the Logistics Resource Center (LRC) worked with OSP to update the Secret Service Directives System the policy manual section governing methods of transportation including reimbursements for travel on charter aircraft, which became effective on April 25, 2018 (FMD-08(04). The policy section titled "Protectee

3

Chartered Aircraft" includes a subsection, "Internal Control/Validations Mechanisms," which details supplemental controls to ensure compliance with the policies governing reimbursements for agents' travel on charter aircraft. In addition to training before the opening of each individual candidate's operations center, FMD will perform monthly audits of transactions processed by LRC/FMD, and the Office of Professional Responsibility (RES) will conduct a compliance audit every three months. On a quarterly basis, the CFO will report to the Chief Operating Officer on charter aircraft reimbursements. Upon the closing of each candidate's Campaign Operations Center, RES will conduct an audit to verify compliance of all reimbursement requirements. This multi-layered approach will ensure compliance with policy and detect errors so they can be corrected in a timely manner. A copy of FMD-08(04) was provided to GAO under separate cover. We request that GAO consider this recommendation resolved and closed as implemented.

Recommendation 4: Update the charter aircraft reimbursement policy to assign the offices responsible for verifying that all calculations done by the campaign committees are accurate, and require a secondary review process prior to making payment.

Response: Concur. New Secret Service policy issued on April 25, 2018, FMD-08(04), sets out the requirements and workflow for processing an invoice. The responsibilities of each entity; LRC, FMD, and the relevant protective detail; are described in depth. The policy requires that both the LRC and FMD review invoices for accuracy. We request that GAO consider this recommendation resolved and closed as implemented.

Recommendation 5: Update the charter aircraft reimbursement policy to specify that protected individuals are to provide IATA [International Air Transport Association] codes and copies of the charter companies' invoices, and that the Secret Service's travel agency is to provide lowest available first-class airfares that include taxes.

Response: Concur. Newly revised Secret Service policy issued on April 25, 2018, FMD-08(04), requires that invoices from the campaign committees must use the IATA codes for all airports. The policy also requires that a copy of the bill or invoice from the charter company itself be submitted with the campaign committee invoice. The workflow design in FMD-08(04) requires the LRC to contact the Secret Service travel management contractor, currently Sato Travel, to obtain the lowest first-class fare, including taxes, available on the date of travel for each leg of the charter flight as soon as they are made aware of the flight by the protective detail. We request that GAO consider this recommendation resolved and closed as implemented.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Diana Maurer, (202) 512-9627 or maurerd@gao.gov

Staff Acknowledgments

In addition to the contact named above, Joseph P. Cruz (Assistant Director), Lisa Canini, Jeffrey Fiore, Chad Johnson, Janet Temko-Blinder, and Jonathan Tumin made key contributions to this report. Also contributing to this report were David Alexander, Jim Ashley, Dominick Dale, Eric Hauswirth, John Mingus, and Carol Petersen.

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