

Evaluation of Time and Attendance Practices

Report No. OIG-AMR-29-00-01

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Inspector General

National Labor Relations Board

Washington, DC 20570

February 29, 2000

I hereby submit an *Evaluation of Time and Attendance Practices*, Report No. OIG-AMR-29-00-01. This review was conducted to determine whether management controls provide adequate assurances that time and attendance transactions are properly authorized and approved, and associated records are complete and accurate. We reviewed Board-side offices of the National Labor Relations Board (NLRB or Agency) except for the Division of Judges and Office of Inspector General.

For the past several years, time and attendance (T&A) systems have been undergoing significant changes due to more flexible schedules and places, increased use of automation, and downsizing in government. Federal guidance covering internal controls over time and attendance were revised in March 1996 to recognize these changes. The principal changes included a greater emphasis of the Agency's responsibility to have in place a system of internal controls that ensures (1) proper authorization and approval of T&A transactions and (2) maintenance of complete and accurate T&A records.

Individual Board Members, the Executive Secretary, Solicitor, and Directors of the Office of Representation Appeals and the Division of Information are responsible for administering leave and attendance for their respective staffs. For these nine Board-side offices, we found:

- Employees administering leave and attendance were not delegated those responsibilities in writing, and inappropriate employees were often administering leave and attendance.
- No offices had designated timekeepers and alternates in writing. In seven offices, the timekeeper and alternate shared passwords. Also, passwords were not changed periodically in seven offices.
- Except for employees working a compressed work schedule, techniques providing timekeepers reasonable assurance regarding employee presence or absence to record T&A data for Board attorneys and supervisors did not exist.
- Six offices did not maintain work schedules indicating planned start and stop work times and hours per day. Two additional offices maintained schedules, but there was no evidence of supervisor approval.

- Two offices did not prepare and maintain necessary documentation for approval and use of annual and sick leave. In the seven offices that claimed to prepare and maintain documentation, three offices excluded the office head from the requirement, and documentation was missing in all offices for a significant portion of leave use transactions.
- Five offices tracked compensatory time and credit hours, which had limited use, informally rather than in the payroll system.
- No offices properly approved T&A reports. Most significantly, T&A reports were not approved in one office; and in six offices, timekeepers, alternates, or another support staff member approved T&A reports even though they were all non-supervisory personnel specifically prohibited from approving T&A reports.
- Pervasive problems existed in the use of advance leave in all six offices included in our sample. Advance leave was not requested in accordance with Agency policy, not approved at the designated level, and not supported by required documentary evidence.

The NLRB issued a policy in December 1998 that sets forth responsibilities of employees, timekeepers, and supervisors regarding recording, examining, and approving T&A transactions. However, we found that the Board-side offices did not comply with many of the policies on authorization and approval of T&A transactions and maintenance of T&A records. The Personnel Director, who is responsible for developing leave and attendance policies, had not conducted regular reviews of procedures as required to discover apparent lapses concerning the proper and accurate T&A recording and reporting.

Recommendations addressing these findings can be found on pages 4, 5, 7, 9, 10, and 11 of this report. We have addressed the recommendations to the Director of Personnel because the Board Members and office heads will need assistance in establishing procedures within their offices, to ensure a proper level of consistency throughout the Board-side offices, and to coordinate with employee groups. The Director of Personnel may also decide to implement some recommendations on an agency-wide basis if deemed necessary. After the basic internal controls are updated, supervisors will be accountable for complying with established policies and procedures.

Adherence to government-wide and Agency policies does not preclude management flexibility. Employees are still provided options for arranging their work schedules to accommodate individual needs and desires, such as exercising, volunteer work, or reducing leave use. Supervisors can excuse infrequent absences from duty of less than one hour with adequate reason, approve annual or sick leave use for family friendly purposes, and otherwise exercise reasonable discretion in administering time and attendance.

An exit conference was held on December 15, 1999, with the Board Members, and the Directors of Administration and Personnel, and other staff. The Director of Personnel submitted written comments on the draft report. She agreed with all but one recommendation, as discussed on page 7 of this report, we have accepted her response. The Personnel Director's comments are presented in their entirety as an appendix to this report.

Jane E. Altenhofen

Inspector General

BACKGROUND

The National Labor Relations Board (NLRB or Agency) administers the principal labor-relations law of the United States, the National Labor Relations Act of 1935 (Act), as amended. The Act is generally applied to all enterprises engaged in interstate commerce, including the United States Postal Service, but excluding other governmental entities as well as the railroads and the airline industries. NLRB authority is divided by law and delegation. The five-member Board primarily acts as a quasi-judicial body in deciding cases on formal records. The General Counsel, like each Member of the Board, is appointed by the President, and is responsible for the issuance and prosecution of formal complaints in cases leading to Board decisions. The General Counsel has general supervision of the NLRB's nation-

wide network of offices.

Each Board Member has a professional staff that includes a chief counsel, deputy chief counsel, two supervisory attorneys, a staff of approximately 10 attorneys, and three support staff to assist in processing cases. The Board-side of the Agency also includes the Offices of Executive Secretary, Solicitor, and Representation Appeals, the Divisions of Information and Judges, and the Office of Inspector General. The heads of these offices report to the Chairman. Approximately 150 Board-side employees, excluding the Division of Judges and Office of Inspector General, were included in this evaluation.

Employee compensation and benefits rely on two systems that operate independently and merge data on a bi-weekly basis. The Time and Attendance (T&A) System is maintained by timekeepers who monitor and record time and attendance for transmission of data to the Department of Agriculture's National Finance Center (NFC) on a bi-weekly basis. Payroll/Personnel System data, which is maintained at NFC, is input by the Payroll/Personnel Systems Unit. Employee compensation is generated when the bi-weekly T&A submission is married with the information in the Payroll/Personnel System.

The five Board Members are located on the 11th floor, with their chief counsel, deputy chief counsel, and support staff - one of whom is the timekeeper. The supervisory and staff attorneys are located on the 9th floor. The Offices of Executive Secretary, Solicitor, and Representation Appeals are wholly located on the 11th floor. The Division of Information is wholly located on the 9th floor.

The Board Members are excluded from annual and sick leave provisions by 5 U.S.C. (2)(x). Therefore, their time and attendance was not included in our review.

OBJECTIVES, SCOPE, AND METHODOLOGY

This review was conducted to determine whether management controls provide adequate assurances that time and attendance transactions are properly authorized and approved, and associated records are complete and accurate.

We reviewed applicable Federal law, regulations, and guidance on time and attendance. General policy is set forth in Title 5 of the United States Code, Subpart E, Attendance and Leave; and the Code of Federal Regulations Section 5, Administrative Personnel. Detailed guidance is included in the General Accounting Office Policy and Procedures Manual for Guidance of Federal Agencies, Title 6 - Pay, Leave, and Allowances (Title 6) dated March 22, 1996. The Office of Personnel Management (OPM) provided guidance on the use of leave slips and meal breaks.

We reviewed Agency guidance set forth in the NLRB Administrative Policies and Procedures Manual (APPM) Chapter 10, Leave and Attendance, dated December 21, 1998. We reviewed supplemental NLRB Administrative Policy Circulars (APCs) and Administrative Bulletins (ABs), and NFC guidance. We also reviewed provisions in union agreements.

We interviewed officials from the Personnel Branch, Personnel Operations Section on Agency policy and their responsibilities.

We reviewed the timekeeping practices for each of the five Board Members' offices, Office of Executive Secretary, Office of the Solicitor, Office of Representation Appeals, and Division of Information. In each of these offices, we interviewed the timekeeper and a senior management official (deputy chief counsel or office director and Board staff supervisory attorneys) to identify operating procedures. We compared the information obtained in interviews to the criteria identified above and determined whether management controls were sufficient.

From a database of transactions for the 12 months ending August 28, 1999, we selected four statistically valid random samples. We verified whether: T&A reports were signed or initialed by the employee, timekeeper and supervisor and agreed with information in the NFC database; and annual leave, sick leave, and other leave was adequately documented. We selected a judgmental sample to review for compliance with policy on advance sick leave.

We conducted this review in accordance with the generally accepted Government audit standards between June and November 1999 at NLRB Headquarters.

FINDINGS AND RECOMMENDATIONS

DELEGATION OF AUTHORITY

Title 6 states that agency policy must affix accountability for recording data, which could be performed by the individual employee, timekeeper, supervisor, or a combination of these persons. Regardless of who records the data, the T&A system must be able to identify the individual responsible for recording the data. Title 6 also states that all T&A reports and related supporting documents must be reviewed and approved by an authorized official.

APPM states that the individual Board Members administer leave for their respective staffs. The Executive Secretary, Solicitor, and Division Heads are authorized to administer leave and attendance for their respective staffs, with certain exceptions. These officials may name alternates and re-delegate authority to subordinate officials, and designate administrative staff as timekeepers. Delegations and designations must be in writing and submitted to the Payroll/Personnel Systems Unit before such action can be recognized or accepted.

Employees administering leave and attendance for Board-side offices were not delegated those responsibilities in writing and, as discussed later in this report, an inappropriate employee was often administering leave and attendance. A re-delegation is necessary in the Board Members offices because staff supervisors generally performed administrative duties rather than the Board Member, and the employees were located on two floors. A re-delegation of authority is optional in the non-Board Member offices because one supervisor could reasonably administer leave and attendance for 5 to 25 employees located on one floor.

No offices designated timekeepers and alternates in writing. However, the timekeepers and alternates were assigned duties as evidenced by being provided access codes to the T&A system.

NFC guidance states that passwords are to be assigned to individual timekeepers and should be changed periodically. In seven of the nine offices, the timekeeper and alternate shared passwords. Also passwords were not changed periodically in seven offices.

The Agency does not collect data that positively identifies the individual who recorded T&A data. The T&A system is programmed to collect a two position, agency assigned number that identifies individual timekeepers recording T&A data, but timekeepers did not enter the data.

Recommendations

1. We recommend that the Personnel Director identify which offices want to re-delegate authority to subordinate supervisory employees and obtain written delegations of authority for them, and obtain written designations of timekeepers and alternates.
2. We recommend that the Personnel Director coordinate changing the passwords for all timekeepers and alternates, and remind timekeepers and alternates of the need to safeguard their passwords.
3. We recommend that the Personnel Director instruct timekeepers and alternates to enter the two position number that identifies the individual timekeepers recording T&A data.

RECORDING T&A RECORDS

Title 6 states that timekeepers and supervisors must be aware of the work time or absence of employees for whom they are responsible to ensure the reliability of T&A data. The basis for recording the data could be (1) observation, (2) timekeeping devices, or (3) other applicable techniques. Title 6 further states that the person recording the T&A data acknowledges responsibility for the accuracy of the recorded data.

In Board Member offices, neither the timekeeper nor the person signing as supervisor were located in the same general area as the employees, so observation could not be used as a basis for recording T&A data. Employees working a compressed work schedule were required to sign in and out each day. For employees not working a compressed schedule, the offices did not use time keeping devices or other techniques as compensating management controls that were sufficient to provide reasonable assurances regarding employee presence or absence. For example, in one Board member's office, the Deputy Chief Counsel had regular contact with the immediate supervisors and was generally informed of employee absences. The contacts were not directly tied to approval of the T&A reports which would be necessary for this approach to be a sufficient technique.

Timekeepers could gain reasonable assurances regarding the presence or absence of employees if T&A reports and leave authorizations are signed by immediate supervisors who are responsible for knowing their employees' whereabouts and productivity.

Recommendation

4. We recommend that the Personnel Director assist the Board Members in developing techniques that provide reasonable assurances that supervisors and timekeepers are aware of employee attendance. If observation is chosen as the applicable technique, timekeepers and supervisors should be provided guidance on what is required.

MAINTAINING T&A RECORDS

Title 6 states that documents supporting T&A records should be completed and maintained. Examples of such documents include those for establishing (1) work schedules, (2) flexiplace arrangements, (3) leave, (4) overtime, (5) compensatory time, and (6) credit hours.

We found flexiplace arrangements were documented, with minor exceptions. No offices used overtime. We identified deficiencies with the documentation for work schedules, leave, compensatory time, and credit hours.

Work Schedules

Title 6 states that documentation of work schedules should be maintained. The records must show employees' pay period schedules indicating planned start and stop work times and hours per day for established work schedules, and approval by the supervisor.

Six of nine offices in our review did not maintain work schedules. Two of these six offices began maintaining work schedules after we interviewed responsible officials. One of these two had memoranda on file for employees who worked other than the regular hours, but much of the information was also developed after our audit began. Two offices maintained schedules, although there was no evidence of supervisor approval. One office had all employees work the official agency hours, so a schedule was not required.

Documented work schedules are necessary for supervisors and timekeepers to monitor employee time and attendance. This is particularly important with the developments in flexi-time policies that allow employees to adjust their work schedules to accommodate individual needs and desires, such as exercising, volunteer work, or reducing leave use.

Establishing work schedules is a critical step in supervisors being able to fulfill their responsibilities. For example, Agency policy allows supervisors to excuse infrequent absences from duty of less than one hour with adequate reason. However, according to OPM guidance, Agencies are not allowed to routinely permit employees to work less than an 80-hours in a pay period, and hour long meal breaks, half of which is in a pay status are not authorized. A supervisor must know an employee's work schedule in order to know if an absence is in pay status and decide whether to authorize the absence.

Leave Slips

The NFC Payroll/Personnel Manual states that a Standard Form 71 (SF-71) should be completed and signed by the employee and supervisor to authorize paid leave usage. Further, Federal personnel regulations require that each agency

maintain records on employees who take leave under the Family and Medical Leave Act of 1993.

OPM revised the SF-71, Leave Request, in December 1997 to enable agencies to gather such information, and distributed the revised form in January 1998 (CPM 98-1). NLRB AB 99-06, dated November 27, 1998, SF-71, Request for Leave or Approved Absence, informed Agency personnel of the revised form.

Offices did not consistently use the SF-71 to document leave usage, and some offices still used the previous version of the SF-71. Two offices did not prepare and maintain SF-71s to document approval and use of annual and sick leave; one of these offices used calendars, e-mails, and vacation schedules to monitor leave use. Leave slips were not consistently used in the seven offices that claimed to prepare and maintain SF-71s.

- Three offices did not properly prepare and maintain SF-71s to document approval and use of annual and sick leave for the office head. In two offices, leave was recorded on a SF-71; in the other office, leave was recorded on form NLRB-2151, Transmittal Slip. Neither form documented approval by a supervisor.
- Of 78 annual leave usage transactions tested, SF-71s were not maintained for 12 transactions, and one SF-71 was not signed by the supervisor.
- Of 78 sick leave usage transactions tested, SF-71s were not maintained for 11 transactions, and one SF-71 was not signed by the supervisor.

Compensatory Time and Credit Hours

Title 6 states that records must show the aggregate hours (or fraction of hours) and days employees worked regular hours, worked overtime, took leave, or used earned compensatory time or credit hours.

The timekeepers for five offices said there was limited use of compensatory time and credit hours, and the hours were tracked informally rather than recorded in the payroll system. The timekeeper for one office said the data was recorded in the payroll system. The timekeeper for three offices said compensatory time and credit hours were not used.

Recommendations

5. We recommend that the Personnel Director remind all timekeepers that they are to maintain a current record of work schedules, and obtain assurances that such records have been developed.
6. We recommend that the Personnel Director notify all timekeepers to destroy old versions of the SF-71, remind them to obtain a leave slip for each absence, and verify compliance in 60 to 90 days.
7. We recommend that the Personnel Director remind all supervisors and timekeepers that compensatory time and credit hours must be recorded in the payroll system.

Management Response

The Director of Personnel disagreed with recommendation number 6. She proposed that, in the interest of paper conservation and cost saving measures, that the Agency continue to use available supplies of the old version of the SF-71 and record leave used under the Family Medical and Leave Act in the remarks section.

We accepted the proposal as reaching management agreement. The Procurement and Facilities Branch distributed the last of the prior SF-71s in December 1999, and minimal time should be required to deplete office supplies.

REVIEW AND APPROVAL OF T&A REPORTS

Title 6 states that review and approval of T&A reports should be made by the official, normally the immediate supervisor, most knowledgeable of the time worked and absence of the employee. The APPM states that non-supervisory personnel may not be authorized to approve or certify T&A reports. NFC guidance requires supervisors to

sign hard copy T&A reports, and employees and timekeepers to initial reports to verify that leave charged, time worked, and non-pay status recorded are correct.

Report Preparation

Agency policy has required that employees, timekeepers, and supervisors initial hard copy T&A reports since at least March 1992 when APC 92-4 was issued. In a September 1997 report on the Financial Audit of Fiscal Year 1996 Appropriation, the Office of Inspector General informed the Agency that timekeepers, employees, and supervisors frequently did not initial T&A reports. We recommended that the Division of Administration reissue the policy to emphasize this requirement. Accordingly, the Agency issued APC-98-01, Transcript of Leave Balances, in October 1997 that reaffirmed Agency policy requiring employees, timekeepers, and supervisors to initial hard copy T&A reports.

None of the offices in our review properly prepared T&A reports.

- In one office, T&A reports were not signed by a supervisor or initialed by the employees.
- In six offices, timekeepers, alternates or a special assistant signed T&A reports as a supervisor. The timekeepers, alternates and the special assistant were all non-supervisory personnel specifically prohibited from approving T&A reports.
- In one office, T&A reports were approved by a second level supervisor who could not observe the employees and did not use other means providing reasonable assurance to verify attendance.
- In one office, the T&A reports for the head of the office were not signed by a supervisor.
- In one office, T&A reports were signed by the office director, but the director's T&A report was approved by a subordinate management official.

T&A reports were not initialed by the timekeeper, employee, and supervisor in many instances. In our statistically valid random sample of 78 T&A reports, six related to the office identified above that had no certification. Of the remaining 72 T&A reports, 17 were not initialed by the employee, 10 were not initialed by the timekeeper, and 15 were not signed by a supervisor or timekeeper signing as a supervisor.

Self-Approval

Title 6 provides that, generally, employees may not approve their own T&A data. The head of an agency, however, may authorize particular individuals to approve their own T&A data when it is not feasible to have the T&A data approved by a supervisor. These exceptions include (1) employees working alone at a remote site for long periods and (2) employees based at the same duty station as their supervisors or timekeepers but frequently away from the same general location. The APPM states that an employee may not approve his/her own T&A report.

One senior level official approved his own leave even though his office is in the same general area as his supervisor. Therefore, this situation does not meet the exception criteria identified in Title 6. Subsequent to our review, the Board Member began to approve this employee's leave.

We noted this one exception because self-approval will be of potential significance once supervisors begin to approve T&A records as required. Unless otherwise authorized by the Chairman, the Board Members will have to approve the T&A records for one or more staff, and the Chairman will also have to approve the T&A records for the heads of the non-Board offices.

Recommendations

8. We recommend that the Personnel Director instruct all timekeepers to ensure T&A records are properly initialed and approved, and verify compliance in 60 to 90 days.

9. We recommend that the Personnel Director consult with Board Members to establish which supervisors should be authorized self-approval, and complete necessary documentation. If the Agency is going to allow self-approval of T&A reports, Agency policy should be revised to reflect the policy change.

ADVANCE SICK LEAVE

Agency policy requires that the employee should make application for an advance of sick leave to the supervisor who normally approves his/her leave on a SF-71 which contains a medical certificate or practitioner's certification as to the seriousness of his/her injury or illness. Branch chiefs, or equivalent, regional directors, officers-in-charge, or designated representative, will approve the leave slip and submit a memo to the division head or authorizing official who will approve or disapprove the request.

We identified 23 employees with advance sick leave balances. We selected a judgmental sample of 11 employees from six different offices who had balances over an extended period of time. We determined whether documentary evidence was maintained and approval was granted in conformance with Agency procedures.

We found that approval was not documented and required documentary evidence supporting advance sick leave was not maintained.

- For 10 of 11 employees, advance sick leave was not approved by the branch chief or equivalent, nor was a memorandum submitted to the to the division head for approval.
- SF-71s were not submitted or approved for 4 of 11 employees.
- Medical notes/certificates were not obtained for 5 of 11 employees.

One employee in our sample was advanced leave under the Family and Medical Leave Act which authorizes leave, primarily for births, adoptions, and serious health conditions. Supervisors must approve such requests for leave subject to the provision of required documentation, which was provided in this instance.

We did not determine the amount of sick leave requested One employee in our sample was advanced leave which was provided in this instance. for "family friendly" purposes, such as a child's minor illness, medical appointments, or funerals, which can be indicated on the current SF-71. "Family friendly" leave is subject to supervisory approval in accordance with Agency guidance including requirements for documentation.

Recommendation

10. We recommend that the Personnel Director notify timekeepers that sick leave is not to be advanced unless properly approved and the required documentation is provided.

RELIANCE ON INTERNAL CONTROLS

Title 6 states that as T&A systems move away from traditional methods of recording and reporting employee work and leave time, it is important to implement and maintain a well defined system that provides management continuous confidence that controls are working as designed. This can be done through various methods, including a clear policy statement and a system for review and testing.

One method of internal control is a well-defined organizational structure and flow of data, with clearly written policies and procedures setting forth the responsibilities of employees, timekeepers, and supervisors regarding recording, examining and approving transactions. The APPM establishing Agency policy was reasonably current, set forth the organizational structure and flow of T&A data, and was fairly clearly written. The responsibilities of employees, timekeepers, and supervisors regarding recording, examining and approving transactions were set forth throughout the chapter as appropriate.

Another internal control is review and testing of all aspects of the T&A system processing procedures and controls in

sufficient scope, depth, and frequency to provide reasonable assurance that key procedures and controls are working and effective and that employee integrity is maintained. The APPM provides for such review and testing, but these tasks were not performed.

The Personnel Director is responsible for regular review and appropriate recommendations for correction or modification of policy and procedures in order to maintain full and complete implementation of Agency policy, Government regulations, rulings, and statutes. The Director also develops and recommends Agency policy and procedures and any necessary revisions thereto concerning the proper and accurate recording of employee attendance and leave earnings.

The Personnel Branch did not conduct reviews and testing that provided reasonable assurances that key procedures and controls were working and effective and that the Agency was in conformance with Agency policy and Government regulations.

Recommendation

11. We recommend that the Personnel Director develop a plan for conducting regular reviews as set forth in Agency policy.

APPENDIX

UNITED STATES GOVERNMENT National Labor Relations Board Division of Administration

Memorandum

TO: Jane E. Altenhofen Inspector General

FROM: Sharon B. Seymour Director of Personnel

SUBJECT: Draft Report "Evaluation of Time and Attendance Practices"

DATE: February 15, 2000

Please find listed below my comments in response to your findings in reference to the above-stated subject. In accordance with your instructions, I have indicated either agreement and/or disagreement to each specific recommendation and, as appropriate, provided accompanying explanation(s).

Recommendations:

1. We recommend that the Personnel Director identify which offices want to re-delegate authority to subordinate supervisory employees and obtain written delegations of authority for them, and obtain written designations of timekeepers and alternates.

Agree. I will issue, in accordance with APPM-PER-10, a memo Agency-wide to operating officials requiring that written delegations and/or redelegations of authority be submitted to the Payroll/Personnel Systems Unit before such action can be recognized or accepted. In addition, I will also request written designations of timekeepers and alternates. Target date for completion is April 30, 2000.

2. We recommend that the Personnel Director coordinate changing the passwords for all timekeepers and alternates, and remind timekeepers and alternates of the need to safeguard their passwords.

Agree. We will remind all Agency timekeepers, alternates and security officers of proper

procedures. Target date for completion is April 30, 2000.

3. We recommend that the Personnel Director instruct timekeepers and alternates to enter the two position number that identifies the individual timekeepers recording T&A data.

Agree. This will be completed in conjunction with recommendation two(2). Target date for completion is April 30, 2000.

4. We recommend that the Personnel Director assist the Board Members in developing techniques that provide reasonable assurances that supervisors and timekeepers are aware of employee attendance. If observation is chosen as the applicable technique, timekeepers and supervisors should be provided guidance on what is required.

Agree. We plan on issuing a memorandum outlining various methods for providing reasonable assurance of employee attendance and advising supervisors of their responsibility regarding employee time and attendance. Except for those employees who are on alternative work schedules and are required to sign in and out, the most appropriate method appears to be through observation. In support thereof, we are recommending that all employees submit Form SF-71 for all leave usage; and remind employees of Agency policy that a hard copy of T&A reports must be signed by timekeeper, employee and supervisor/manager. Target date for completion is April 30, 2000.

5. We recommend that the Personnel Director remind all timekeepers that they are to maintain a current record of work schedules, and obtain assurances that such records have been developed.

Agree. This will be communicated through Agency-wide correspondence. Target date for completion is April 30, 2000.

6. We recommend that the Personnel Director notify all timekeepers to destroy old versions of the SF-71, remind them to obtain a leave slip for each absence, and verify compliance in 60 to 90 days.

Disagree. In the interest of paper conservation and cost saving measures, we should not make it mandatory as long as we have copies of the old version available for use. As to the recording of leave used under the Family and Medical Leave Act, such leave can be and is being recorded in the remarks section of the old version. We will recommend use of the SF-71, either the old or revised form, for all leave requests.

7. We recommend that the Personnel Director remind all supervisors and timekeepers that compensatory time and credit hours must be recorded in the payroll system.

Agree. This information will be communicated Agency-wide. Target date for completion is April 30, 2000.

8. We recommend that the Personnel Director instruct all timekeepers to ensure T&A records are properly initialed and approved, and verify compliance in 60 to 90 days.

Agree. We will reissue the Agency policy, (APC-98-01) that reaffirmed the Agency policy requiring employees, timekeepers and supervisors to initial hard copy T&A reports. Target date for completion is March 30, 2000.

9. We recommend that the Personnel Director consult with Board Members to establish which supervisors should be authorized self-approval, and complete necessary

documentation. If the Agency is going to allow self approval of T&A reports, Agency policy should be revised to reflect the policy change.

Agree. We will communicate and consult with the Board Members and other Agency managers to ascertain such information and to provide guidance accordingly. Target date for completion is April 30, 2000.

10. We recommend that the Personnel Director notify timekeepers that sick leave is not to be advanced unless properly approved and the required documentation is provided.

Agree. This information will be communicated via memorandum in accordance with APPM-PER-10 governing advance of sick leave. Target date for completion is April 30, 2000.

11. We recommend that the Personnel Director develop a plan for conducting regular reviews as set forth in Agency policy.

Agree. In accordance with Agency policy to conduct regular reviews and to make appropriate recommendations therewith, we plan on making timekeeping part of annual reviews conducted by the Program Development and Personnel Management Evaluation Section. Target date for the initial review is no later than April 30, 2001.

Some of the target dates and/or recommendations may be impacted as a result of our obligation to consult and negotiate, as appropriate, with the unions regarding changing employee working conditions. Therefore, some of the dates may have to be adjusted and recommendations may have to be modified. We plan on issuing, annually, a memo to all Agency employees providing guidance regarding the Agency's T&A policy. In addition, we will reactivate the issuance of a timekeeper bulletin to be distributed semi-annually. Also, as required, we will issue appropriate APCs and ABs.

If you have any questions or would like to discuss my response to your draft report, you may contact me on 273-3801.