

UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

Agreed-Upon Procedures of USCP Time and Attendance System

Report Number OIG-2012-04 July 2012

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INSPECTOR GENERAL

PREFACE

The Office of Inspector General (OIG) prepared this report pursuant to the Inspector General Act of 1978, as amended. It is one of a series of audits, reviews, and investigative and special reports that OIG prepares periodically as part of its oversight responsibility with respect to the United States Capitol Police to identify and prevent fraud, waste, abuse, and mismanagement.

This report is the result of an assessment of the strengths and weaknesses of the office or function under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

The recommendations therein have been developed on the basis of the best knowledge available to OIG, and have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to all who contributed in the preparation of this report.

Carl W. Hoecker Inspector General

Carl W Hocker

AUP of USCP Time and Attendance Syst

OIG-2012-04, July 2012

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Abbreviations/Acronyms

Agreed-Upon Procedures	AUP
Assistant Chief of Police	ACOP
Capitol Division	CD
Chief Administrative Officer	CAO
Chief of Police	Chief
Capitol Visitor Center	CVC
Dignitary Protection Division	DPD
Fair Labor Standards Act	FLSA
Family Medical Leave Act	FMLA
Fiscal Year	FY
General Counsel	GC
Government Accountability Office	GAO
Government Printing Office	GPO
Hazardous Incident Response Division	HIRD
Headquarters	HQ
House Division	HD
Human Resources Information Systems	HRIS
Library of Congress	LOC
Information Technology	IT
Mission Assurance Bureau	MAB
National Finance Center	NFC
Office of Employment Counsel	OEC
Office of Financial Management	OFM
Office of Human Resources	OHR
Office of Information Systems	OIS
Office of Inspector General	OIG
Office of Facilities and Logistics	OFL
Office of Management and Budget	OMB
Office of Policy and Management Systems	OPOL
Office of Professional Responsibility	OPR
Operational Services Bureau	OSB
Overtime	OT
Patrol Mobile Response Division	PMRD
Position Description	PD
Protective Services Bureau	PSB
Security Services Bureau	SSB
Senate Division	SD
Standard Operating Procedure	SOP
Time and Attendance	T&A
Training Services Bureau	TSB
Uniform Services Bureau	USB
United States Capitol Police	USCP or the Department
Virtual Private Network	VPN

EXECUTIVE SUMMARY

Auditors have reported payroll processing as a material weakness in previous financial statement audits. As a result of those findings related to United States Capitol Police's (USCP or Department) time and attendance (T&A) process, the then Chief of Police (Chief) and Chief Administrative Officer (CAO) requested that the Office of Inspector General (OIG) conduct Agreed-Upon Procedures (AUP). The AUP was to assist in further determining the adequacy, effectiveness, and efficiency of USCP policies, procedures, and internal controls over the Department's T&A processes and system.

The first phase of our work was to obtain an understanding of T&A policies and procedures and the environment and note any differences. The second phase was to assist in evaluating whether controls were operating as designed and, if necessary, recommend efficiencies. Our scope included T&A policies and procedures in effect as of December 1, 2011. We used T&A data from Fiscal Year (FY) 2011 and the first and second quarters of FY 2012 to test whether controls were operating as designed. During testing, we identified systemic and isolated issues such as process improvement opportunities and control deficiencies.

In an effort to control overtime cost and accurately track payroll expenses, USCP uses an automated time collection system called USCP employees must enter time they have worked into The system is designed to allow employees to engage the system at 1 of 59 units at the beginning and end of each work shift. Employees monitor their data for accuracy by logging onto the application at a computer workstation.
We believe that the Department has issued adequate guidance related to T&A. However, some Bureaus, Divisions, and Offices did not consistently interpret, implement, or enforce those procedures. Bureaus, Divisions, and Offices were not consistent with regard to check in/out procedures, use of sign in/out sheets, and the handling of hardship cases. For example, Library of Congress (LOC) officers, in addition to check out by video. In addition, House officers did not have a checkout process and, at the end of tours of duty, could leave their post as soon as the relief officer arrived. In its interim guidance dated September 20, 2011, however, the Department reiterated that "all employees are required to record their daily reporting times using the Department's
To gain an understanding of the standardized management reports, we reviewed all reports generated. There were only seven unique reports provided. The Department could improve some of the reports by providing summary data and standardize its distribution of T&A reports to assist a wider range of users.
¹ This interim guidance supersedes existing policy Special Directive , effective December 18, 2006.

While the Office of Human Resources (OHR) provides clock utilization reports for clocking in/out (missed swipes)², timekeepers, and supervisors did not always use the reports. Supervisors and timekeepers stated reports would be more useful if they contained dates and times that

USCP has 81 timekeepers who are decentralized in the various Bureaus, Divisions, and Offices—all of whom have other administrative responsibilities. The workload and demands vary greatly and, as a result, some timekeepers dedicate 8 hours a day for timekeeping while others expend little effort on timekeeping activities.

There are 10 categories for overrides, which timekeepers perform in the normal course of business and perhaps the Department should not label these as overrides. In reality, each time a timekeeper or supervisor make a change or adds a comment, the Department considers this an override. Timekeepers can clear exceptions such as missed swipes and can override time. Those actions are inherent in the duties of a timekeeper.

time clocks (swipe units) are devices strategically located throughout the Capitol complex that record start and finish work times for USCP employees. The Department issues and assigns each employee a Proximity Card to record clock in/out time for hours worked. Swipes are the same as clocking in/out.

The Department is in various stages of developing three functions for Approval Interface, Virtual Time Clock, and Electronic Timesheet Certifications). Those functions are, however, manual processes; and the Department does not yet have formal milestones for implementation. If the Department fully implements those three functions, the T&A process would become more efficient and effective.

T&A guidance requires that employees record daily reporting times using the Department's time clocks. Some Bureaus, Divisions, and Offices, however, did not always follow the prescribed procedures for clocking in/out, commonly referred to as a missed swipe. We reviewed a report of missed swipes for the first and second quarter of FY 2012 (October 2011 through March 2012). During that period, the computer recorded 37,177 missed swipes. Of those missed swipes, sworn employees accounted for 94.4 percent and civilian employees accounted for 5.6 percent of missed swipes. Such a lack of compliance continues because the Department does not hold managers and employees accountable or consistently enforce compliance with disciplinary actions. Lack of compliance, accountability, and inconsistent interpretation of Department policies and processes over T&A resources contribute to inefficiencies and consumption of limited resources.

Reliable data are important to accurately account for the expenditure of resources attributable to pay, leave, and/or allowances. Thus, OIG recommends that the Department immediately:

- Reinforce T&A processes, roles, responsibilities, and authorities to ensure consistent interpretation and compliance with T&A guidance. Note noncompliance with T&A guidance in employees' standards, milestones, and performance evaluations and consider other disciplinary actions to ensure compliance.
- Centralize monitoring of hardship cases with the Office of Human Resources (OHR).
- Standardize the summary and detail, format, and distribution of T&A management reports.
- Consider whether exceptions performed in the normal course of business should be labeled as overrides.
- Continue efforts to fully automate and integrate available functions such as leave approval, scheduling, and substitution into business processes related to each function.
- Develop a swiping policy that allows for monitoring and enforcement. Create a
 standard list of exceptions for missed swipes in the comment field of
 policy similar to the policy regarding tardiness specifically for missed swipes should
 be developed and implemented. In addition, the Department should evaluate whether
 exempt employees should swipe in/out.

See Appendix A for a complete list of OIG recommendations. On March 23, 2012, OIG conducted an interim briefing and revised procedures based on the then-Chief's comments. On June 29, 2012, we conducted an exit conference with Department officials and provided a draft report for comment. We incorporated the Department's comments as applicable and attached their response to the report in its entirety in Appendix B.

BACKGROUND

In prior year financial statement audits,³ auditors reported payroll processing as a material weakness. As a result of findings related to USCP's time and attendance (T&A) process, the then Chief of Police (Chief) and Chief Administrative Officer (CAO) requested the Office of Inspector General's (OIG) assistance. OIG performed procedures to determine the adequacy, effectiveness, and efficiency of United States Capitol Police's (USCP or Department) policies, procedures, and internal controls over the Department's T&A

The Department's interim guidance, guidance, guidance, dated September 20, 2011, states the following:

is the automated system used by USCP to collect, process, report, maintain hourly/daily/weekly time, attendance, and leave data for USCP employees. The system interfaces with the National Finance Center (NFC)⁴ system to create biweekly salary payments. The biweekly certification report is an official document produced by the system that documents and summarizes the hours and types of duty, absence, and/or leave that the system recorded for each employee for a designated two-week pay period. The certification reports must be promptly prepared and distributed by timekeepers to employees and approving officials to ensure receipt when the information is of maximum benefit for management purposes prior to transmission to NFC. No later than each Friday after the close of the prior pay period, Bureau Commanders and Office Directors (or equivalent), or their designees, submit a report via email confirming the following certification of T&A data for the respective organization elements:

- 1. Total number of employees assigned during the subject pay period
- Total number of certification reports certified for the subject pay period
- 3. Total number of certification reports pending approval for the subject pay period
- 4. Total number of certification reports completed prior pay periods

The Department's interim T&A guidance supersedes existing policy Special Directive, effective December 18, 2006. According to the interim guidance:

The primary objective of maintaining T&A data and systems is to ensure that an employee's work hours and/or absence and leave hours are properly reported. Reliable data are important to accurately account for the expenditure of resources attributable to pay, leave, and/or allowances. To achieve this objective, internal controls must be in place that provide for reasonable assurance that,

T&A data are completely and accurately collected, recorded and maintained.

Financial Statement Audits for FYs 2006 through 2011 identified payroll processing as a material weakness.

⁴ NFC, located in New Orleans, Louisiana, operates an integrated, on-line personnel/payroll system and provides all related support systems and services necessary for the processing and maintaining of personnel and payroll transactions for USCP employees.

T&A transactions are properly authorized and approved.

Employees are prohibited from entering their own T&A data into the system and are prohibited from approving their own T&A data. Employees responsible for timekeeping duties must have an alternate timekeeper or supervisor enter/certify their time.

All employees are required to record their daily reporting times using the Department's time clocks.⁵ Prior to transmission of T&A data to NFC by the Office of Human Resources (OHR) each pay period, employees must acknowledge their review of the biweekly certification report by signing and dating the report, which verifies that the T&A data is accurate.

OHR is responsible for collecting and transmitting payroll data to the NFC. NFC prepares, processes, and transmits USCP pay to USCP employees. USCP reimburses NFC from the USCP appropriation through the U.S. Treasury.

OBJECTIVE, SCOPE, AND METHODOLOGY

We conducted the procedures enumerated in Appendix C solely to assist the Department in evaluating its T&A program and system to determine if USCP could make the T&A process more efficient and effective. Our scope included T&A policies and procedures in effect as of December 1, 2011. We used T&A data from Fiscal Year (FY) 2011 and the first and second quarters of FY 2012 to test whether controls were operating as designed.

Our methodology entailed obtaining an understanding T&A environment of USCP. We reviewed USCP policies and procedures and interviewed 51⁶ civilian employees and sworn officers between December 7, 2011, and March 12, 2012, involved in the T&A process to gain an understanding of the:

- Structure and strategy, and how OHR supports the USCP mission
- T&A efforts underway
- T&A policies and procedures
- Resources dedicated to T&A

⁶ Between December 7, 2011, and March 12, 2012, we interviewed 14 civilians (OHR and timekeepers), 14 sworn officers, 8 Sergeants, 4 Inspectors, 2 Lieutenants, 1 Deputy Chief, and the Executive Team and attended 8 roll calls.

⁵ Exceptions include employees whose duties require that they are away from where time clocks are located, for example, employees in training or on official travel; employees working as part of an approved telework agreement; employees on Workers' Compensation; employees on administrative leave or leave without pay; dignitary protection assignments, etc. In such cases, employees are responsible for ensuring that their designated timekeepers have accurate time and attendance information recorded in the system and are promptly notified of work schedule changes.

Based on the meetings, we conducted additional interviews with Office Directors aligned under the CAO and the Bureau Commanders aligned under the Assistant Chief of Police (ACOP). Offices under the CAO provide USCP with the necessary administrative functions that support its mission, including OHR, the Office of Financial Management (OFM), the Office of Facilities and Logistics (OFL), the Office of Policy Management System (OPOL), the Office of Information Systems, and the Office of Employment Counsel (OEC). Areas under ACOP are the operational law enforcement resources that accomplish the USCP mission, including Mission Assurance Bureau (MAB), Operational Services Bureau (OSB), Protective Services Bureau (PSB), Security Services Bureau (SSB), and Uniformed Services Bureau (USB).

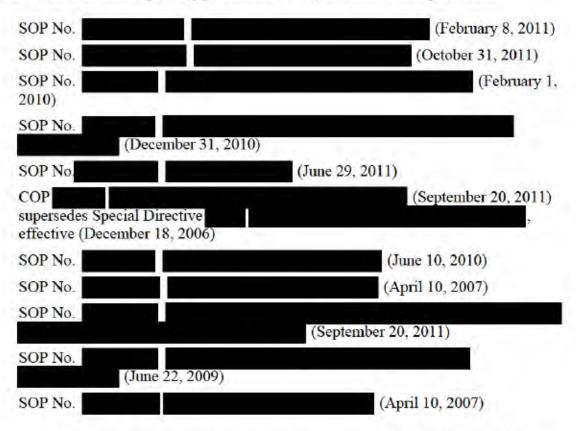
We also reviewed the organizational structure, functionality, and modules of the system OHR maintains—systems that each Bureau/Office uses—and other relevant policies and procedures. We performed comprehensive internal control reviews by documenting the workflow for each key business subprocess and the controls governing each process (employee interaction, timekeeper interaction, supervisory interaction, leave, substitutions, roll call, and OHR). In addition, we identified duty posts and their proximity to roll call and time clocks. We observed, documented, and developed flow charts that illustrate the following:

- T&A Overview
- Time Clock
- Roll Call
- Certification Report
- Form
- Form

We reviewed a frequency report for clock usage by location for the period December 1, 2010, through December 1, 2011. We analyzed time clock usage at the 59 time clock locations throughout the Capitol complex. The narratives/flow charts, roll call locations, various shift schedules, and graphical ratio of work time clocks use for the period December 1, 2010, through December 1, 2011, are in Appendices D, E, F, G, and H. We performed expansive testing of the key controls, focusing on both the design and operation of each control. We also evaluated key T&A controls to determine if the Department had effectively designed controls while operational testing sought to validate that designed controls were actually operating as intended. Further, we reviewed a listing of exceptions or overrides from the system. We also reviewed payroll reports to understand how managers use those reports to manage their staff. During testing, we identified systemic and isolated issues such as process improvement opportunities and control deficiencies.

⁷ Form is the form designed to request the substitution of one employee to work additional duty for another.

To gain an understanding of the Department's T&A process, we reviewed the following applicable USCP standard operating procedures (SOPs) and interviewed personnel.



We also used guidance from the Government Accountability Office (GAO), the Office of Management and Budget, and available law enforcement information to determine the industry best practices for implementing T&A.

We conducted the agreed-upon procedures in Washington, D.C., from December 2011 through June 2012. The services were conducted in accordance with the American Institute of Certified Public Accountants' (AICPA) Statements on Standards for Attestation Engagements, and Government Auditing Standards issued by the Comptroller General of the United States. The sufficiency of procedures is solely the responsibility of those parties specified in this report. Consequently, we make no reference regarding the sufficiency of the procedures described in Appendix C either for the purpose for which this report was requested or for any other purpose.

We were not engaged to and we did not conduct an examination, the objective of which would be the expression of an opinion on the T&A program or the adequacy of the related internal controls. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of USCP, Capitol Police Board, and Members of the United States Congress, and is not intended to be and should not be used by anyone other than those parties.

On June 29, 2012, we conducted an exit conference with Department officials and provided a draft report for comment. We incorporated the Department's comments as applicable and attached their response to the report in its entirety in Appendix B.

RESULTS OF AGREED-UPON PROCEDURES

USCP personnel did not consistently interpret, comply, or enforce Department T&A policies and procedures. Inconsistencies existed in check in/out procedures, use of sign in/out sheets, and the handling of hardship cases. OHR provides sufficient T&A management reports; however, some the reports could be improved to provide summary data and the Department should standardize its distribution of T&A reports to assist a wider range of users. While OHR provides clock utilization reports, timekeepers and supervisors did not always use the reports. The T&A system have 10 override types, which timekeepers perform in the normal course of business. Perhaps, the Department should not label these as overrides.

Time and Attendance Policies and Procedures

The Department has issued interim guidance (COP	Interim Guidance:
September 20, 2011) related to To	&A, which describes authority and
coverage, responsibilities, and procedures. However, so	
did not consistently interpret, comply, or enforce Depart	ment's T&A policies and
procedures. Yet, the Department's guidance does not co	
for failure to enforce or comply with the guidance. Bure	
consistent check in/out procedures. For example, Librar	
video surveillance cameras to check out. Rather than us	
Jefferson Building officers phone the supervisor at the M	Madison Building to check out.
House Division officers did not check out at all and wou	
tour of duty when relief officers arrived. However, SOP	No.
5	tates:
All employees are expected to clock in/out on a daily basi	is (to include instances of shift
gaps and working on his/her scheduled day off. The exce	
are authorized to be absent from the duty station (for examp	
The Department's interim guidance dated September 201	Latetas that appalarious are required to
record their daily reporting times using the Department's	
of sign-in/out sheets was not consistent. SOP No.	time clocks. Agam, use
, discusses the purpose of establish	ing uniform procedures for
employees to follow for roll calls, briefings, checkout, and	
checkout sheet, with actual time recorded. For example,	
checkout sheet, with actual time recorded. For example,	the Senate Division used the sign-in

sheet for the beginning and end of shift time verification whereas the House Division did not use sign in/out sheets.

According to an official, Office of Professional Responsibility reported nine investigations of T&A abuse during the 7-year period from 2003 through 2010. A recent example of abuse involved an officer who took advantage of the hardship case procedures and requested several extensions of flexible work schedule, which were approved. However, supervisors did not confirm the officer's status. The officer was able to take advantage as a hardship case because of the lack of management oversight. As a result, the officer did not consistently report for duty. USCP implemented new hardship case controls to prevent such abuses, limiting extension requests, improving communication among supervisors and, to the extent possible, requiring the use of the Family Medical Leave Act (FMLA). The Department would achieve better internal control if OHR centrally tracked hardship cases rather than at the Division level.

Time and Attendance Management Reports

OHR distributes T&A management report to employees and approving officials to ensure accurate and complete payroll data. To gain an understanding of the standardized management reports generated, we reviewed 16 zipped files for Pay Period 25, December 2011. Of the 15 reports provided, 7 were unique reports, as shown in Table 1.

⁸ OHR provided the zipped files. Two of those zipped files were duplicates. The other nine reports were Trailing 7-Day OT Reports for different divisions.

Table 1 - Time and Attendance Management Reports9

Name of Report	Purpose of the Report	Report Distribution	Frequency of Distribution	Comment
Trailing 7-Day Overtime (OT) Report	This is a manpower report (swom and civilian) by division, which provides compensatory time/overtime, compensatory time straight time, overtime, and straight time.	H1, H2, H3, and all Inspectors receive this report. Only House has the reports filtered to the Division Levels indicating that Sergeants receive these reports.	Weekly	This report does not provide summary data. This report would be more useful if the overtime was totaled by individual and summarized to include the number of individuals and hours by each category.
Daily Check Up	The Daily Check Up report indicates that there are no exceptions with four tests: a. Employee with unassigned home team. (See Comment A) b. Employee in but not in NFC. c. Employee in NFC but not in d. AD Reasons that need to have AD reason type assigned. (See Comment D)	OHR	Daily	a. Unassigned home team, (not assigned to a Bureau). This happens occasionally, but the timekeeper must correct prior to pay. d. AD-Additional Duty. The timekeeper or supervisor must enter a valid AD reason for each occurrence of overtime.
Department Overtime w/reason	Department overtime by Bureau and Reason.	All Bureaus	Weekly and Each Pay Period	This report needs revision to include summary totals by reason and Department. Null indicates that the timekeeper has not entered the AD code Yet, 17 percent of the overtime was coded "NULL." WDO-working day off.
Trailing Missed Swipes	This report lists the employees' name, date of missing check in/out by status.	USB	Weekly	
Excessive Annual Leave	This report tracks employees with excessive annual leave balances.	PSB	Each Pay Period	Balances over 240 are reported.
Excessive Earnings	This reports tracks employees whose earnings are currently projected to exceed the annual pay limitation for USCP employees.	PSB, Dignitary Protection Division (DPD), and Investigation Division	Each Pay Period	The cash value of compensatory time in excess of 240 hours is included in this projection. The report also displays (year to date) year-to-date gross pay and average bi-weekly pay. The gross annual is estimated using the average bi-weekly for the remaining two pay periods plus the year-to-date.
Excessive Comp Time	This report tracks 1.0 and 1.5 compensatory time balances for employees over the threshold.	PSB	Each Pay Period	Balances over 240 are reported

Source: OHR reports provided related to Pay Period 25, December 2011.

⁹ The management reports do not specify between sworn or civilian. The report states that overtime is captured.

As shown in Table 1, the *Trailing 7-Day Overtime Report* would be more useful if the report totaled overtime by individual and summarized the number of individuals and the number of hours by each category. For example, Inspectors preferred summarized data for their Division, while Sergeants preferred the detail regarding their Section. In addition, OHR did not consistently distribute the reports to all users. For example, only Inspectors received reports in the Capitol Division, Senate, and LOC. If OHR sent the reports to the Sergeants in each Section, the reports would be more helpful in managing T&A.

Clock Utilization

USCP employees are required to record their daily reporting times using the Department's time clocks." Table 2 contains the locations and number of clocks of units per location and frequency of use. The frequency report for clock usage for December 1, 2010, through December 1, 2011, lists 59 time clocks.

Table 2 - Location and Number of Units per Location and Frequency of Use

Tuble 2 - Location und	tumber of	Cittis per	Locusion and Prequency	oj est
Location	Number of Units	Number of Total Swipes	Average Number of Swipes per Unit	Percentage of Total Swipes
HQ	11	216,705	19.700	25.03
CVC	5	175,785	35,157	20.30
Fairchild Building	13	165,962	12,766	19.17
Longworth Office Building	5	120,686	24,137	13.94
Jefferson Building	2	44,627	22,314	5.15
Madison Building	3	27,925	9,308	3.23
67 K Street	2	17,111	8,556	1.98
Rayburn Firing Range	1	17,079	17,079	1.97
Russell Building	1	14,834	14,834	1.71
Cheltenham	2	14,407	7,204	1.66
Offsite Delivery	2	13,517	6,759	1.56
Ford Annex	2	13,231	6.616	1.53
Government Printing Office (GPO)	3	10,425	3,475	1.20
	2	5,098	2,549	0.59
Power Plant	1	2,717	2.717	0.31
National Capitol Region Coordination Center (NCRCC)	1	2,329	2,329	0.27
Court Liaison	1	1.296	1,296	0.15%
Capitol HB-5	1	1,179	1,179	0.14%
Postal Square	1	909	909	0.10%

Source: OHR clock usage frequency report by location for the period December 1, 2010, through December 1, 2011.

Of 59 time clocks throughout the Capitol complex, 2 of the clocks used most often were at CVC. That is reasonable, as there are about 350 officers assigned to the Capitol Division. HQ has the second most often used clock located on the first floor. A number of divisions could use that clock, including Senate Division, Hazardous Incident Response Division

(HIRD), MAB, DPD, OSB, and supporting civilian personnel. The next most often used time clock is located on the first floor of the Fairchild Building. Divisions using that clock could include House Division, the Patrol Mobile Response Division (PMRD), and personnel assigned to the CAO. Another clock often used is located in the Jefferson Building, which LOC officers use because it is located outside the locker room.

During our interviews, numerous supervisors and timekeepers stated they did not use the clock utilization reports often. Supervisors and timekeepers also stated that a report containing dates and times for units that were not operational would be more useful than the current clock utilization reports. Such a report would provide verification of employee accounts that the time clock system was malfunctioning and assist in clarifying exceptions. Based on our observations, shutting down minimally used clocks could create backlogs at other time clock locations and possibly affect employee use.

Overrides

In the context of override is a misnomer. Essentially every transaction a timekeeper makes is an override of the system. For example, timekeepers can clear exceptions such as missed swipes and hours worked by an employee. The actions are inherent in the duties of timekeepers. Each time a timekeeper makes a change or a supervisor adds a comment the transaction is considered an override. As shown below, there are 10 types of overrides.

- AD Reason -- A timekeeper assigns a reason to any overtime that is worked.
- Employee -- Information pertaining to the employee record is changed such as an employee's team assignment.
- Employee Holiday -- A Holiday is assigned to an employee.
- Long Term Absence -- If an employee inputs a block of leave hours/time into the system, it generates this type of override.
- Retro Conf Override -- Created when adjustments to a previous pay period are made
- Scheduled Times An employee's start and end times changed for a day.
- Shift -- An employee's shift changed for a day.
- Time Code -- If a timekeeper records a leave request for a "short" (request to leave early), the code will generate this type of time code. If an employee's time is graced in or out, this would also be an override.

- Work Summary -- If a timekeeper adds a clock time or enters data in the comment block, the system will generate this type of override.
- Employee Balance -- Adjustments made to employees leave balance. Only two OHR timekeepers can make such adjustments.

Conclusions

The Department has issued adequate guidance related to T&A. However, some Bureaus, Divisions, and Offices did not consistently interpret, implement, or enforce the T&A procedures.

Check in/out procedures, the use of sign in/out sheets, and the handling of hardship cases were not consistent. Furthermore, the Department did not hold managers and employees accountable for a lack of compliance. The Department could improve management reports by providing summary data and standardizing distribution of T&A reports to assist a wider range of users. Supervisors and timekeepers stated that a more useful clock use report would be when was not functioning. "Overrides," in the context of is a misnomer. Essentially the Department considers every transaction an override that a timekeeper performs in the normal course of business. Thus, OIG makes the following recommendations.

Recommendation 1: We recommend the United States Capitol Police immediately enforce its Time and Attendance policies and procedures to ensure consistency throughout the Department. In addition, the Department should include in performance standards, milestones, and evaluations criteria that will hold supervisors and employees accountable for a lack of compliance as it relates to time and attendance. The Department may also want to consider other disciplinary actions for noncompliance with time and attendance policies and procedures.

<u>Recommendation 2</u>: We recommend the United States Capitol Police consider centralizing monitoring of hardship cases through the Office of Human Resources for better monitoring, communication, and oversight.

<u>Recommendation 3</u>: We recommend the United States Capitol Police consider evaluating the utility of all time and attendance related reports; revising/adding data elements of those reports, such as summary and individual totals; and standardizing report distribution to appropriate management and timekeeper personnel.

Recommendation 4: We recommend the United States Capitol Police consider discontinuing time and attendance reports offering little value to supervisors and timekeepers and create and adequately distribute meaningful reports. A report

requested by numero	us timekeepers was one that identified the dates and times
during which a	clock unit was not operational.
Recommendation 5:	We recommend the United States Capitol Police consider
whether timekeeper	and supervisory exceptions performed in the normal course
of business should be	labeled override.

	Information Technology Environment
functions w The Departr including, b recording le and comme	n understanding of the environment, we reviewed modules and
The available fu	application is a fully integrated However, USCP uses only a portion of the notions. USCP does not use two key functions within
man Microstal atter the r can the r List chan adm trans	age the workforce using application instead of the manual process using rosoft Excel spreadsheets. Using a series of organizational-defined rules blished within the application similar to the rule sets that handle the time and indance functionality mentioned above, the Scheduler functionality would replace need to manage the workforce manually and would create work assignments that optimize costs based on rank, salary, training completed, and other factors built into rules. The method to obtain post-cost information is to reconcile the Post Priority to the pay records for the individuals that worked specific posts. The costs could need from day to day if Officers of various grades and steps earn overtime, which is inistratively burdensome. Schedules are manually entered and adjusted, and scribed from another scheduling system, based on the Post Priority Listing. Scheduler function also would provide accurate cost information related to
indiv nuc poin	vidual post operations. That would allow the Department to understand fully how the cost is associated with performing a duty such as staffing a door or entrance/exit. The Department has already purchased the Scheduler module for and associated licenses; however, a level of effort is required between the Department
10	

The Blue Book contains information such as academy graduation class rank, next of kin, locker, and parking space assignments.

¹² The Post Priority List is an analysis of USCP Manpower needed based on various scenarios. The Listing is the foundation for each Section's Daily Roster.

and vendor—to develop, document, and implement the custom rule sets (business logic) that drives the Scheduler module. This effort has not started and not funded. representatives estimate that to complete this custom development would cost between \$600,000 and \$1,000,000, depending on the complexity of the business logic.
process to manage and track the trading of shifts among sworn employees. The process is completely paper based and captures the request, approval, and subsequent actions outside of and a timekeeper is required to update the timesheets for the affected employees. The has baseline functionality that handles shift trading throughout the workforce. Employees could initiate and supervisors approve shift trading within and the application would automatically update the affected timesheets. Similar to the Scheduler function, the Shift Trading function would require that the Department develop, document, and implement business rules to handle scenarios that arise when trading shifts. Similar to the Scheduler implementation, such an effort would require support from the vendor.
The Department does not handle the Form process in a single repeatable manner throughout the law enforcement bureaus within the Department. Normalizing and standardizing the practice throughout the Department would be required before the Department could implement an efficient automated process within The Department does not have a plan for purchasing and customizing the Shift Trading function.
The Human Resources Information System (HRIS) is in various stages of development for the following three functions for
Leave Approval Interface – Leave approval Department-wide is a manual paper-based process that requires handwritten signatures. In previous years, DPD in collaboration with the Office of Information Systems (OIS) created a standalone leave-approval system that allowed sworn officers to create leave requests electronically when on travel with dignitaries. However, that DPD system would still require supervisors to print off the leave, approve it, and forward it to a timekeeper for manual entry into
Working with DPD and OIS, HRIS developed an automated interface to that would load approved leave requests into thus eliminating the need for hard copy approvals and manual data entry by timekeepers. As of July 2012, that leave-approval system and interface is in user acceptance testing phase of the process and, once approved, will be available to only DPD as a pilot program. If the DPD pilot program proves successful, the leave approval function will be rolled out Department-wide. The Department does not have any implementation dates.

has built in functionality that can handle automated leave approvals; however, HRIS determined that the front-end interface for the approval function was not as user friendly as the front-end interface OIS developed. Virtual Time Clock – Civilian employees and sworn officers are required to clock in/out using physical time clocks stationed throughout the Capitol complex. One difficulty using physical time clocks is for employees who are teleworking or for officers on protective duty that requires travel. has functionality called the Virtual Time Clock, which would enable employees and officers away from the campus to connect to the USCP network by way of a Virtual Private Network (VPN) and clock in and out using the user interface. The user would click the "clock in" button and would capture the time similar to the time capture on a swipe in/out at a time clock. That function is part of the baseline available in the application; however, as of July 2012, OHR has not configured access roles to allow a user to navigate the virtual time clock. A pilot program is underway to allow teleworking employees in OHR to clock in and out using their Web browser via the connection to the USCP network. Electronic Timesheet Certifications – Civilian employees and sworn officers populate their timesheets using the time clocks, and during the pay period timekeepers make the necessary adjustments to individual timesheets to add, for example, approved leave, vacation, holidays, and comments that support the changes. Once the pay period ends, the timekeeper and/or supervisor request each individual to certify their timesheet as accurate. Certification is a manual process that happens outside of the application using the timesheets printed from the application. A project that would allow individuals to log into the application and certify timesheets is underway but in the early stages of planning. The effort does not have any formal deadlines or deliverables, and HRIS will determine the most efficient and effective way to implement the technical change within this application. access based on "least privilege" with roles setup to provide specific OHR grants access to the individual based on job responsibilities. OHR has configured 18 roles that OHR can grant to individuals. One individual is the USCP system administrator Another individual is the back-up system administrator.

for

Conclusions

The application is a fully integrated application that
developed. However, USCP uses only a portion of the available functionality. Two key
functions are available within that USCP does not use: Scheduler and Shift
Trading. has baseline functionality that handles shift trading throughout the
workforce. The Scheduler and Shift Trading functions would require that the Department
develop, document, and implement business rules for handling the various scenarios that
arise when trading shifts. OHR is in various stages of developing three other functions for
(Leave Approval Interface, Virtual Time Clock, and Electronic Timesheet
Certifications). Those functions would provide accurate cost information related to
individual post operations and employee pay. The specific access rights granted to a system
administrator or equivalent role and the appropriateness of the individuals granted system
access is appropriate. Therefore, OIG makes the following recommendation.

Recommendation 6: We recommend the United States Capitol Police continue its efforts to automate fully its labor management system,

In addition, we recommend that the United States Capitol Police consider integrating the Scheduler, Shift Trading functionalities, Leave Approval Interface, Virtual Time Clock, Electronic Timesheet Certifications, and others that would make its labor management system more efficient and effective. Such integration of functions would allow the Department to understand fully the costs associated with performing a duty, such as staffing a door or entrance/exit point.

Employee Clock Usage

USCP's September 2011 interim T&A guidance requires that employees record their daily reporting times using the Department's time clocks. Some Bureaus, Divisions, and Offices, however, did not follow the prescribed procedures for "swipe in/out. 13", Failure to follow prescribed procedures has been a repeat finding for the last 6 years in financial audits and continues to occur because the Department does not hold accountable Bureau Commanders, Office Directors, and employees for compliance with T&A guidance.

We reviewed the missed swipe report (clock in/out) for the first and second quarter of FY 2012 (October 2011 through March 2012). Exhibit 1 shows the number of missed swipes by Bureaus and Offices (37,177). For the same period, sworn employees accounted for 94.4 percent of missed swipes and civilians accounted for 5.6 percent. Of the 94.4 percent for sworn employees, PSB accounted for 40 percent and USB accounted for 26.8 percent. Shown in Table 3 is the USB breakout of missed swipes.

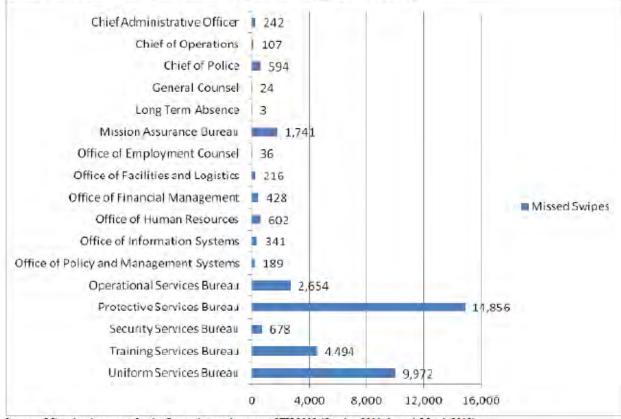
time clocks are devices that are strategically located throughout the Capitol complex that record start and finish work times for USCP employees. Proximity Cards are agency issued cards that are assigned to each employee to record the clock in/out time for hours worked. Clocking in or out is the same as swipes.

Failure to clock in/out creates an exception in that the timekeeper must clear. To clear the exception, timekeepers communicate with the supervisor to determine the information needed and then manually enter the data or information in the practice noted was the addition of a comment to provide some context for the missed swipe. Of 37,177 missed swipes, timekeepers used the comment field in 12,472 cases, approximately 34 percent of the time. However, the comments did not consistently provide information regarding the validity of the missed swipe. In fact, in some cases the comments state that the employee forgot their proximity cards or the employee forgot to clock in. No requirement exists to document reasons for missed swipes. However, the risk of inaccurate data in the comments with missed swipes.

A requirement also did not exist for monitoring missed swipes because there was no consequence or penalty for failure to clock in/out. The Department should treat a missed swipe similar to overtime, requiring an "additional duty" code. A system of standard codes for missed swipes would allow the categorization of missed swipe explanations and the ability to monitor missed swipes without valid explanations. Creating a drop down menu with a standardized list to populate a comment field within would lead to producing reports that are more meaningful for timekeepers and supervisors as well as forecasting information for leadership/management corrective strategies. A system of standard codes of missed swipes would be a more efficient and effective method of monitoring and reporting missed swipes by each employee.

There also are certain groups of employees for which swiping into may not be the most effective or efficient manner to record their time. Per the Fair Labor Standards Act (FLSA), "exempt" employees are exempt from overtime requirements and the value of having an exempt employee swipe is negligible compared with a non-exempt employee that is eligible to earn overtime.

Exhibit 1: Missed Swipes (October 2011 through March 2012)



Source: Missed swipe report for the first and second quarter of FY 2012 (October 2011 through March 2012).

Table 3 -Missed Swipes Uniform Services by Division

USB Division	Missed Swipes
DC/LT/AA (Fifth Floor HQ)	88
2000 - USB/LOC	1,115
2200 - House (Division)	2,153
2300 - Senate (Division)	2,080
2400 - Capitol (Division)	4,536
Grand Total	9,972

Source: USCP Pay Period 3 (January 29, 2012; through February 11, 2012)

Conclusions

There were a significant number of missed swipes, most with little or no explanation. No mechanism exists for monitoring the legitimacy of missed swipes. In addition, no policy existed that required monitoring of missed swipes or consequence or penalty for non-compliance.

<u>Recommendation 7</u>: We recommend the United States Capitol Police develop a policy that specifically addresses swiping requirements for monitoring as well as a policy that prescribes consequences for failing to comply with swiping. In addition, the Department should evaluate the need for exempt employees to swipe in lieu of alternate means of recording time and attendance within necessary internal controls.

Recommendation 8: We recommend that the United States Capitol Police create a standardized list of missed swipe explanations and incorporate those explanations into through a drop-down menu for comments fields.

Timekeeper Utilization

From December 7, 2011, through March 12, 2012, we interviewed 51 civilian and sworn employees. We also observed two roll calls to enhance our understanding and attended six other roll calls to test the consistency of actual procedures. We believe an imbalance of timekeeper workload exists. For example, the Senate Division has one timekeeper and no assistants. The Capitol Division has an Administrative Officer and five timekeepers. Another practical difference is the way in which Sergeants communicate with timekeepers. Several timekeepers stated that some Sergeants added comments on a daily basis into assist the timekeepers with proper coding while others did not. Another inconsistent practice was distribution, collection, and reporting of Certification Reports. Many timekeepers were uncertain about why OHR requested the certification report statistics, which creates the potential for data inconsistently reported among Bureaus. Because the certification process was manual, OHR had no other mechanism to obtain the certification report statistics. An effort to increase the consistency of some of the routine practices should lead to a sharing of resources. A consistent response from timekeepers we interviewed concerned the volume of forms presented each day and the

associated burden with the manual and inefficient task.

According to OHR reports, USCP has 81 timekeepers, decentralized in the various Bureaus, Divisions, and Offices. Of the 81 timekeepers, 39 are listed as primary, 26 are listed as No Duty, 14 are listed as Back Up, and 2 are listed as others. For example, 1 timekeeper might manage the T&A for 40 employees, while another might manage more than 400. As a result, some timekeepers dedicate 8 hours a day for T&A activities while others spend little effort related to timekeeping. Such a condition has occurred because the organizational structure is not consistent across the Department. According to the Department's interim T&A guidance dated September 2011, timekeepers are responsible for the following:

- Prior to transmission of T&A data to NFC by OHR each pay period, ensure the accurate completion of all employee T&A data in the by reconciling all time worked, leave taken, and additional duty worked by approved reason.
- Print and distribute biweekly certification reports for each employee not later than noon on Monday after the prior pay period has closed.

- Review certification reports, ensure the prompt return of signed certification reports, and disclose any discrepancies promptly to supervisors.
- Ensure that confirmation of completion of certification process is sent to OHR.
- 5. In cases where the employee, with confirmation from the supervisor, believes that time and attendance data contained in the certification report is in error:
 - a. Correct the entry in the employee's record;
 - b. Enter the reason/justification for the correction into the designated field with
 - c. Ensure the accurate completion of a T&A Correction Log; and
 - d. Generate a new certification report for review and certification.
- Maintain T&A records for each employee in accordance with Department policy.

The Department has documented timekeeping responsibilities in the position descriptions (PDs) of employees. However, the position described is an Administrative Assistant, CP-0303-05. The PD listed timekeeping duties as an ancillary task among five separate administrative functions, such as preparing procurement-related documents, which indicates that the duties are 50 percent. The PD also lists "Support Services" as 25 percent and "Mail, Correspondence, and Report Processing" as 25 percent. Most of the timekeepers interviewed were Administrative Assistants, grades CP-5 or CP-6. Yet, the PD does not reflect the amount of time spent on T&A activities. While inherent efficiencies may exist through centralization of timekeepers, inefficiencies could outweigh them because of variances in the nature of individual bureau operations. A significant amount and possibly an inefficient manner of communication between Sergeants and timekeepers are required to clear exceptions in the documented the process flows for T&A procedures including employee, timekeeper, and supervisory interaction; leave; substitutions; roll calls; and OHR, which are shown in Appendix D and E.

Conclusions

USCP has 81 timekeepers, which the Department decentralized throughout Bureaus, Divisions, and Offices. Such decentralization has led to an imbalance of timekeeper resources. The condition occurred because the organizational structure was not consistent across the Department. Timekeeper workloads and demands vary greatly and, as a result, the Department does employ some timekeepers for 8 hours a day in conflict with their PDs; while others spend little effort related to timekeeping. A significant amount of communication is required between Sergeants and timekeepers to clear exceptions in

<u>Recommendation 9</u>: We recommend the United States Capitol Police evaluate the feasibility of pooling timekeeper resources to level imbalanced workloads after the

Department has established time and attendance procedures that are consistently utilized as outlined in recommendation one. Additionally, the United States Capitol Police should revise Position Descriptions and incorporate timekeeper duties that reflect the amount of time spent on time and attendance activities.

APPENDICES

List of Recommendations

Recommendation 1: We recommend the United States Capitol Police immediately enforce its Time and Attendance policies and procedures to ensure consistency throughout the Department. In addition, the Department should include in performance standards, milestones, and evaluations criteria that will hold supervisors and employees accountable for a lack of compliance as it relates to time and attendance. The Department may also want to consider other disciplinary actions for noncompliance with time and attendance policies and procedures.

<u>Recommendation 2</u>: We recommend the United States Capitol Police consider centralizing monitoring of "hardship cases" through the Office of Human Resources for better monitoring, communication, and oversight.

<u>Recommendation 3</u>: We recommend the United States Capitol Police consider evaluating the utility of all time and attendance related reports; revising/adding data elements of those reports, such as summary and individual totals; and standardizing report distribution to appropriate management and timekeeper personnel.

Recommendation 4: We recommend the United States Capitol Police consider discontinuing time and attendance reports offering little value to supervisors and timekeepers and create and adequately distribute meaningful reports. A report requested by numerous timekeepers was one that identified the dates and times during which a clock unit was not operational.

<u>Recommendation 5</u>: We recommend the United States Capitol Police consider whether timekeeper and supervisory exceptions performed in the normal course of business should be labeled override.

Recommendation 6: We recommend the United States Capitol Police continue its efforts to automate fully its labor management system,

In addition, we recommend that the United States Capitol Police consider integrating the Scheduler, Shift Trading functionalities, Leave Approval Interface, Virtual Time Clock, Electronic Timesheet Certifications, and others that would make its labor management system more efficient and effective. Such integration of functions would allow the Department to understand fully the costs associated with performing a duty, such as staffing a door or entrance/exit point.

Recommendation 7: We recommend the United States Capitol Police develop a policy that specifically addresses swiping requirements for monitoring as well as a policy that prescribes consequences for failing to comply with swiping. In addition, the Department should evaluate the need for exempt employees to swipe in lieu of alternate means of recording time and attendance within necessary internal controls.

Recommendation 8: We recommend the United States Capitol Police create a standardized list of missed swipe explanations and incorporate those explanations into through a drop-down menu for comments fields.

Recommendation 9: We recommend the United States Capitol Police evaluate the feasibility of pooling timekeeper resources to level imbalanced workloads after the Department has established time and attendance procedures that are consistently utilized as outlined in recommendation one. Additionally, the United States Capitol Police should revise Position Descriptions and incorporate timekeeper duties that reflect the amount of time spent on time and attendance activities.

DEPARTMENT COMMENTS



1110 101-114-5101

UNITED STATES CAPITOL POLICE

OFFICE OF THE CHIEF 118 D STREET NE WARHINGTON DC 20518 7212

July 13, 2012

MEMORANDUM

TO:

Mr. Carl W. Hoecker Inspector General

FROM:

Thomas P. Reynolds Acting, Chief of Police

SUBJECT:

Response to Office of Inspector General (OIG) draft report on its Agreed-Upon Procedures of USCP Time and Attendance System (Report No.

OIG-2012-04).

The purpose of this memorandum is to provide the United States Capitol Police response to the recommendations contained within the Office of the Inspector General's (OIG's) draft report Agreed-Upon Procedures of USCP Time and Attendance System (Report No. OIG-2012-04).

The Department agrees with all the recommendations and appreciates the opportunity to work with the OIG to address the underlying issues which have led to long standing material weakness within the Department's payroll processing area. The Department will assign Action Plans to appropriate personnel regarding each recommendation in effect to achieve long term resolution of these matters.

Thank you for the opportunity to respond to the OIG's draft report. Your continued support of the men and women of the United States Capitol Police is appreciated.

Very respectfully.

Thomas P. Reynolds Acting, Chief of Police

CC

Chief Administrative Officer Acting, Assistant Chief of Police

USCP Audit Liaison

Malaumily Assumitted by the Colombiaton on Accreditation for Law Enterpayment Assessing, Inc.

Agreed-Upon Procedures

PROCEDURES

Phase One – Document Understanding

- Review applicable time and attendance policies and procedures.
 - A. Conduct interviews.
 - i. Timekeeper 5
 - ii. Sergeants 10, including at least one from the following divisions:
 House, Capitol, Senate, DPD, Investigations, HIRD, PMRD, MAB, and TSB.
 - B. Conduct observations.
 - C. Obtain and document an understanding of the differences in procedures followed by various Bureaus, Divisions and Sections of USCP.
 - D. Interview the operational overtime management and program analyst, regarding the tracking and analysis he performs relative to overtime incurred by sworn officers.
 - E. Document the procedures for conducting roll call as it relates to tracking time and attendance of sworn officers.
 - F. Obtain and document an understanding of the various shift schedules used by USCP.
 - G. Obtain and document an understanding of the standardized management reports generated by OHR including how OHR creates reports, to whom they are distributed and how, or if the recipients use the reports once received.
 - Determine which clocks are the most and least used.
 - ii. How are the clock utilization reports used and by whom?
 - H. Obtain and document an understanding of the organizational structure of the USCP's timekeepers. How many employees is each timekeeper responsible for, to whom they report, and what other duties, if any, they perform in addition to serving as a timekeeper?
 - Produce process flow narratives that describe the policies and procedures in use for time attendance by USCP.
- Prepare flowcharts to document processes and controls identified above.

IT Environment (3&4)

3.	Review applicable time and attendance policies and procedures and conduct inter	rviews
	and observation, as necessary, in order to gain an understanding of	IT
	environment and document that understanding.	

- A. Obtain an understanding of the modules or functionality within is currently in use by USCP.
- B. Obtain an understanding of the modules of functionality within is currently in development.
- C. Obtain an understanding of the modules or functionality within are available from the vendor, but not used by USCP.
- 4. Obtain a listing of all user accounts with detailed access rights provided to each account and through inquiry, observation and inspection determine:
 - A. Specific access rights granted to a system administrator or equivalent role and the appropriateness of the individuals granted system access.
 - B. Specific access rights granted to a timekeeper and the appropriateness of the individuals granted timekeeper access.
 - C. Specific access that allows individuals to clear exceptions, for example, on the missed swipe report and the appropriateness of the individuals granted access.
 - D. Specific access that allows individuals to override employee's time and the appropriateness of the individuals granted access.
 - E. Use of generic or anonymous accounts is appropriately restricted.
- Obtain a listing of all overrides in FY 2011.
 - A. Evaluate the overrides in the context of the environment. If necessary, recommend appropriate preventative controls that will reduce the occurrence of overrides.
- Additional procedures as identified by OIG based on previous steps.

Phase Two

- Obtain the missed swipe report for Q3 and Q4 of FY 2011 and categorize the various causes and quantify the number of instances by category.
- 8. Obtain a listing of all hardship cases for which officers are working on split shifts as of the start of this engagement. Interview the assigned supervisors for those officers and determine whether controls were designed to ensure that officers are clocking in and out appropriately are operating as designed.

- Select a sample of six roll calls, including coverage for all three shifts. Through a combination of inquiry, observation and inspection, test identified procedures for controls identified in step 1.
- 10. Select a sample of 12 duty stations (including at least 1 from the following divisions (Capitol, House, Senate, PSB, MAB, and OSB for three date, and analyze the following attributes:
 - A. Proximity to Sergeant
 - B. Proximity to swipe unit
 - C. Presence and nature of other IT hardware relevant to time and attendance process (such as wi-fi router or Ethernet cables)
- 11. Meet with Assistant Inspector General for Investigations, and obtain a listing and description of any ongoing investigation into abuses of the time and attendance process. Evaluate the conditions in the context of the current environment. Make recommendation for the preventative and/or detective controls to mitigate the risk of recurrence of the issues.
- Additional procedures as identified by OIG based on results of previous steps.

Time and Attendance Narratives

I. General Overview

A. USCP Mission

The United States Capitol Police (USCP) was established as a Federal law enforcement agency in 1828. USCP's primary responsibility is to protect and secure Congress, its Members, staff, and visitors, as well as the entire Capitol area, from threats of crime or disruption by designing, implementing, and administering security systems and modalities that enable Congress to fulfill its Constitutional responsibilities in a safe and open environment. The Committee on House Administration and the Senate Committee on Rules and Administration provide legislative oversight of USCP. The Department makes annual budget requests to the Subcommittees on legislative branch in the House and the Senate.

B. FY 2012 Annual Pay and Salary Cap

The FY 2012 biweekly limitation rate for premium pay is \$6,477.00, and the maximum annual payable rate is \$168,411.00. Those amounts remain unchanged from the FY 2011 rates. Employees whose annual rate of basic pay exceeds the rate of pay under Title 5, United States Code, and Executive Level V (\$145,700 for FY 2012) are not eligible to earn premium pay or perform additional duty that includes compensatory time.

C. Specialty Pay for Field Training Officers (FTO)

USCP is authorized to establish and determine positions that may be designated as specialty assignments or that require proficiency based on experience, education, training, or other appropriate factors, and to provide additional compensation for such positions. Officers who wish to participate in a specialty pay assignment must obtain the on Police Net and fill it out with their name and the date they received FTO training.

The FTO officer, FTO supervisor, FTO coordinator, first line official, and second line official should sign the form to note their approval, then route it to Office of Human Resources (OHR). When OHR receives the form, they transfer the information from the to an Excel tracking file, and the Payroll team processes the form in National Finance Center (NFC) using the Special Payment Processing System (SPPS). SPPS automatically calculates and adjusts for the appropriate taxes. The funds are then certified and released to NFC for payment to the applicant. The dollar amount is noted in the remarks section of the applicant's Leave and Earnings Statement, and the funds are disbursed to the applicant's accounts via electronic funds transfer (EFT).

II. Budgeting and Planning for Core Mission Requirements

A. Post Priority List

Each section's administrative sergeant prepares a schedule based on the Post Priority List (PPL), a manpower database. PPLs are divided into small spreadsheets that each section maintains based on various situations. For example, the Capitol Division dayshift maintains one PPL for weekdays when Congress is in session, weekdays when Congress is out of session, weekends in session, and weekends out of session. Each situation involves different manpower needs. PPL spreadsheets contain regular posts as well as additional templates based on other scenarios.

Time and Attendance Narratives

The posts covered on the PPL list are in order of importance. If stakeholders request that USCP add a post, USCP will analyze the importance of the proposed post to determine its placement on the PPL. When a commander must reduce posts covered due to staffing issues, USCP will refer to the PPL and close the least critical post first. PPL also identifies the point of core mission vulnerability at which USCP cannot close any more posts without affecting the ability of Congress to operate safely. At that point, supervisors must assign additional duty to supplement staffing.

B. Overtime

Overtime is incurred based on operational requirements and is calculated by hours and available personnel. Each USCP division has a different overtime allotment, which is determined by an overtime management analyst. OHR runs a trailing overtime report in which it distributes to the various divisions to assist in tracking the workforce and monitoring overtime. Overtime usage is discussed at weekly morning Intel meetings.

USCP has standard procedures for budgeting and planning overtime. As noted in the PPL section, USCP has identified its core mission requirements and determined the minimum amount of workforce needed to meet those objectives. USCP also has the ability to plan a significant portion of its overtime requirements based on historical data, the need to apply overtime to core mission requirements that the Department cannot meet with existing sworn personnel, and the consistent occurrence of large, scheduled special events. The nature of potential unscheduled events requires that USCP maintain a broad level of flexibility, however. Such flexibility is fiscally restrained, and an overtime management analyst has determined the appropriate balance of workforce needed with respect to planned and unplanned overtime. The Department reaches a balancing point when the cost of overtime exceeds the cost of another full-time equivalent. The analyst monitors reports daily to identify any significant variances that exceed the planned allotment and makes independent inquires to determine the nature of any variances. The officials of each division must be prepared to explain variances to the Chief of Police every Monday morning. In addition, the Assistant Chief of Police (ACOP) assigns the additional duty codes that are used in to track reasons for overtime.

III. Time and Attendance Process

A. Employee

Calculating Employee Time

Each USCP employee is distinguished as either flex or non-flex in the time-and-attendance system,

This category is generally determined by the employee's Fair Labor Standards Act (FLSA) status, exempt or non-exempt. OHR time-and-attendance personnel enter non-flex employees' scheduled shifts into

at the beginning of each pay period at the request of the employee's supervisor.

Shifts must be reentered each pay period only if there is a change from the previous pay period. Uniformed employees have three standard shifts: Section One – midnight (10:30 p.m. – 7:00 a.m.), Section Two – day (6:30 a.m. – 3:00 p.m.), and Section Three – evening (2:30 p.m. – 11:00 p.m.). Even though employees are scheduled for 8.5 hours, only 8 hours are recorded as time worked and compensated. The additional 30 minutes are allowed to account for breaks and lunch and are recorded in

Time and Attendance Narratives

The employee's scheduled shift period is automatically marked as "regular work" in and any deviation is automatically marked as "unpaid." For example, if the supervisor schedules an employee to work from 6:30 a.m. to 3:00 p.m., the 8 hours between 6:30 a.m. and 2:30 p.m. automatically records this as paid time. If the employee clocks in at 6:30 a.m. and clocks out at 4:00 p.m., the time between 6:30 a.m. and 7:00 a.m. will be marked "unpaid;" the time between 12:00 noon and 12:30 p.m. will be marked "unpaid – break" for lunch; and the time between 3:30 and 4:00 p.m. will be marked "unpaid." Employees who deviate from their work shift in cases such as additional duty and night differential must first obtain approval from their supervisors and provide evidence of that to the timekeeper, who will reclassify the unpaid time to "paid" time in (See the Additional Duty section for more information regarding additional duty deviations.)
automatically calculates night differential for all employees. While deviation from core hours is permitted if necessary for operational purposes, it is not advised for mission support civilian employees. Management has discretion to allow staff to work outside core hours.
Clocking In and Out
The time and attendance process begins when an employee clocks in at 1 of 59 time clock locations. Time clocks are situated at USCP headquarters, the Capitol, and Capitol office buildings as well as other locations where USCP employees are located. Employees must use both their USCP identification Proximity Card and a personalized identification number (PIN) to clock in and out.
The Department has programmed time clocks with an automatic grace period of 30 minutes before and 7 minutes after a shift begins or ends before will begin to calculate overtime. For example, an officer can clock in for a 7:00 a.m. shift as early as 6:31 a.m., and the clock-in time will "grace in" at 7:00. If the shift ends at 3:30 p.m., will not begin accruing overtime until 3:38. If an officer clocks in before the grace period begins (for example, clocking in at 6:29 a.m. for the 7:00 a.m. shift), will record the actual clock-in time as the start time. If the early start was not authorized, the timekeeper must manually grace in the officer at the scheduled start time.
Employees who do not properly clock in or out could receive a counseling statement in the form of a as well as other disciplinary actions.
Additional Duty

The supervisor assigns employees additional duty through a scheduled draft, which is prepared at least 2 weeks prior to the date of the assignment. Employees are required to work assigned additional duty unless excused; however, the supervisor may approve reassignment of additional duty to a qualified substitute. An unscheduled shift may also be necessary in the case of such things as special events or unscheduled leave. Holdovers occur when a supervisor drafts an employee on duty to stay for an assignment after their

The employee's supervisor must approve requests for additional duty. Exempt employees who perform overtime work in order to receive compensation time must obtain approval through a

scheduled shift.

for the pay period in which the employee performed additional duty. The employee's supervisor must approve the estimated hours of additional duty in advance. If the employee exceeds the original estimated hours, the supervisor must authorize additional hours through a second memorandum before the end of the pay period. The memorandum must provide a reason for the additional duty. The reason should match one of the approved events in

Only employees who are not exempt from FLSA may receive overtime compensation and compensatory time. Those employees may choose between monetary compensation and compensation time. The pay rate used to calculate overtime earned (1.0 or 1.5 times base pay) depends on the amount of scheduled and unscheduled leave used by the employee during a given pay period. For example, if an officer works the entire 80/85-hour pay period without taking leave, the Department considers any additional duty overtime and is eligible for overtime compensation at 1.5 times base pay. If the officer does not work the entire 80/85 hours but takes approved schedule leave during that time, the supervisor will apply scheduled leave towards the 80/85 hour threshold, and compensate additional duty at 1.5 times base pay. If the supervisor does not approve leave, it is considered unscheduled, however, the leave hours will not be applied toward the overtime threshold and additional duty hours will be compensated at 1.0 times base pay up to the hours of unscheduled leave used. Employees can change elections of overtime for monetary compensation or compensatory time each pay period, but the employee must make an election at the time the employee earns overtime.

Employees assigned to work additional duty may find qualified substitutes to take their assignment. The requesting employee must prepare and sign Form

which must also be signed by the substitute employee and each employee's supervisor. The requesting employee can find a qualified substitute up to 24 hours before the scheduled tour of duty begins. The substitute employee may find one alternate substitute with the approval of a section commander, but the employee cannot substitute additional duty more than twice. Sergeants will deny subsequent requests.

Employee Leave

The following leave acts apply to USCP employees:

Family and Medical Leave Act of 1993 (FMLA) (Public Law 103-3, February 5, 1993), Effective August 5, 1993

FMLA entitles eligible employees of covered employers to take unpaid, job-protected leave for specified family and medical reasons with continuation of group health insurance coverage under the same terms and conditions as if the employee had not taken leave. Covered Federal employees are entitled to a total of 12 administrative workweeks of unpaid leave during any 12-month period for (a) the birth of a son or daughter and care of the newborn; (b) the placement of a son or daughter with the employee for adoption or foster care; (c) the care of a spouse, son, daughter, or parent with a serious health condition; and (d) a serious health condition of the employee that makes the employee unable to perform the duties of his or her position. Upon return from such leave, an employee must return to the same position or to an equivalent position with equivalent benefits, pay, status, and other terms and conditions of employment.

Federal Employees Family Friendly Leave Act (Public Law 103-388, October 22, 1994), Effective December 2, 1994

Most covered Federal employees may use up to 104 hours (13 days) of sick leave each leave year to care for a family member or to arrange for or attend the funeral of a family member. Full-time employees may use 40 hours (5 days) of sick leave for these purposes without regard for their current sick leave balance. An employee may use an additional 64 hours (8 days) if the employee maintains a balance of at least 80 hours of sick leave in his or her sick leave account.

USCP u	ses the following forms for requesting leave:
1.	- Form used to request scheduled and unscheduled leave. Employees must fill out and have it approved by their supervisor to obtain scheduled leave. If an employee takes unscheduled leave, that employee must complete Form upon returning to work.
	Form used to request leave advancement. For example, if an employee has a leave balance of 40 hours but needs to take 60 hours of leave for medical purposes, the employee can request 20 hours of leave advancement (resulting in the employee having a negative leave balance). The Department can advance leave if the employee has exhausted annual and compensatory time balances. The chain of command must approve such a request. Per though the remainder of the year. The Department can advance a maximum of 240 hours of sick leave per year.
	Form used to request leave transfers. Employees can use this form to request transfers from compensatory time to offset negative annual leave balances and transfers from annual leave and/or compensatory time to offset negative sick leave balances. The employee and employee's supervisor must sign the request for leave transfers. Unlike Form the request does not have to go through the chain of command for approval.
provides Timekee	the approved forms to timekeepers, who code the time as scheduled leave in the coding of leave determines the pay rate used to calculate overtime earned. (See the nal Duty section above for additional information regarding eligibility.)
	mitary Protection Division (DPD), the Mission Assurance Bureau (MAB), and two sections of the

Capitol Division have a computer-supported automated Leave Tracking System (LTS) that replaces the use of paper leave slips. Employees are able to log into the automated LTS using a computer or BlackBerry device and request leave. Supervisors receive email notification of the request and are able to approve or reject the leave. Supervisors copy timekeepers on these emails.

Timesheet Review

All employee time and attendance information is stored in the system. The division timekeeper, the supervisor, the employee, and OHR Processing, Records and Payroll Section can access the

information. Employees are encouraged to review their timesheets regularly and report promptly any discrepancies to their supervisors.

- margin a second control of the con
According to Interim Guidance: biweekly certification reports for each employee no later than noon on the Monday after the end of each pay period. Employees must review their report, then sign and date to certify that the time and attendance information is accurate. If the employee believes that information in the certification report is incorrect, they must indicate the data they believe to be erroneous. (See the Supervisors: Authorization and Approval section below for more information regarding the process for correcting erroneous data.) The reports are submitted to the employees' supervisors, who sign and date the documents to indicate their approval. Once the approval process is complete, OHR transmits the time and attendance data to NFC. When it is not practical to obtain an employee's signature before OHR must transmit the data, supervisory review of the certification report should still take place no later than the Wednesday after the end of the pay period. When it is not practical to obtain the supervisor's signature before OHR must transmit the data, the supervisor should document approval as soon as reasonably possible but no later than the Friday after the end of the pay period.
sop , dated October 31, 2011, states that employees should review time records electronically via as well as signing the certification report. That process is inconsistent with the Interim Guidance, which only discusses the certification report.
If the employee is not paid, the employee notifies their timekeeper, who then reports it on the list of retroactive adjustments/corrections sent to OHR time and attendance personnel. The time and attendance personnel make the changes in and send the retroactive adjustment to NFC as part of the timesheet submission process. NFC generates a payment and sends it to the Processing, Records and Payroll Section to be distributed to the employee.
B. Supervisors
Authorization and Approval
Per supervisory authorization and approval is the means to ensuring the accuracy of time and attendance information. Supervisors are responsible for reviewing and approving all time reflected in seach pay period before OHR transmits time and attendance data to NFC. Contains a field in which supervisors can enter comments to explain reasons for shift adjustments, failures to clock in or out, additional duty (AD) overtime codes, or anything else relevant to an employee's shift.
Supervisors are also responsible for ensuring that their employees review and sign their biweekly certification reports each pay period. If anyone must correct information, the supervisor informs the timekeeper of the necessary alterations to the timesheet. Once the certification report is correct, the supervisor or other official most familiar with the employee's schedule must sign and date the report to indicate their approval. This is consistent with <i>Interim Guidance:</i> which notes that supervisors are responsible for promptly resolving discrepancies and errors that employees reported and for reviewing and certifying all adjustments or corrections to time-and-attendance records.

The Department has various ways of accounting for employees assigned to duty for particular shift such as
time clocks, daily roll calls, and checkout procedures. Roll calls take place in designated rooms,
hallways, cafeterias, or other specified locations. The Department performs 42 roll calls daily among 6
buildings (Longworth, Capitol, Headquarters, Madison, Fairchild, and 67 K Street) and offsite delivery for
the Uniformed Services Bureau (USB), Library of Congress (LOC), Patrol Mobile Response Division
(PMRD), DPD, MAB, and Hazardous Incident Response Division (HIRD). In addition to accounting for
employees, roll calls also serve to brief employees on daily announcements, notify them of schedule or
assignment changes, and ensure officers are ready to assume their posts. Administrative sergeants prepare
information for roll call and take roll while other sergeants make the announcements. Roll calls consist of
reading off the list of employee names and checking off all who are present. Officers proceed directly to
their assignment after roll call.
Supervisors responsible for taking roll arrive before the scheduled roll call time in order to prepare
paperwork and check log sheets/books. A schedule is prepared the day before, and supervisors must update
it prior to roll call. The first order of business when supervisors report for duty is to check the

Checkout procedures are a means of accounting for employees by having supervisors record the time officers end their tour of duty. DPD, the Capitol Division, and the House Division do not require physically check out at the end of an employee's shift. The Senate Division, LOC, and PMRD require a supervisor to record the time checked out and initial the timesheet.

Administrative personnel take communications from employees regarding sick or emergency leave and

such requests. After identifying the number of officers who will be present, the supervisor modifies the

previously prepared schedule and determines the need for any holdovers from a prior shift.

to update the roll call sheet.

. The supervisor verifies that the employee has logged all

C. Timekeepers

record them in the

Responsibilities Under

Most USCP divisions have a timekeeper, a backup timekeeper, and an administrative officer who oversees administrative duties, including timekeeping. Workload distribution for timekeepers in various divisions is inconsistent, and the difference in the number of backup timekeepers and administrative assistants is not relative to the number of employees for time and attendance functions. Timekeepers for LOC, DPD, and the Senate Division each spend at least 8 hours per day on time and attendance duties and are the only timekeepers for their respective divisions. LOC and DPD each have one clerk to assist with timekeeping duties, but the Senate Division only has 1 timekeeper responsible for 300 employees.

Timekeepers are responsible for reconciling time worked, including overtime worked for approved reasons, to verify that employees completed accurate timesheets. Timekeepers also perform timesheet maintenance throughout the pay period to address exceptions in a timely manner. Timekeepers enter daily to adjust times and clear out red lines for employees whose clock-in and clock-out times differ from their pre-

established shifts. Timekeepers must clear out all red lines and ensure there are no exceptions before submitting the timesheets to OHR.

If someone discovers a discrepancy in a previous pay period, the timekeeper creates a retroactive/corrected time and attendance entry for the affected period. Timekeepers must complete retroactive/corrected time and attendance entries by the last Friday before the end of the current pay period. The timekeeper must submit a to OHR's Processing, Records, & Payroll Section. The timekeeper and the division commander then sign the log. The timekeeper must also print a new certification report, which the employee and supervisor will sign, and date, and then staple to the original certification report.

Timekeepers must print biweekly certification reports for employees on the Wednesday following the end of the pay period. The reports contain the aggregate number of hours worked during the pay period. Timekeepers must review certification reports and promptly disclose any discrepancies to supervisors. Once discrepancies are resolved, the timekeepers prepare and distribute the certification reports to sergeants for review. Sergeants are responsible for obtaining officers' handwritten signatures indicating their approval and then returning the certification reports to the timekeepers. Upon receiving the approved reports, timekeepers email a completed Certification Report Verification document to OHR's Support, no later than the second Wednesday of the new pay period. The report displays the pay period, the number of certification reports assigned, the number of reports signed, the number of reports pending approval, and the number of prior-period reports completed. Timekeepers are required to maintain certification reports for their designated division for two years, along with any supporting documentation.

We noted a weakness in the Certification Report Verification control regarding the status of incomplete certifications. The timekeeper lists any incomplete certification as pending, if the Certification Report Verification does not contain follow-up information regarding the status of reports previously noted as pending. That dilutes accountability. OHR audits may not be able to assess accurately compliance without access to follow-up information on the status of pending reports.

We also noted an additional weakness in the Certification Report Verification controls during our interview with the DPD timekeeper. The DPD timekeeper does not count the actual number of certification reports received from sergeants, instead they provide an estimate on the OHR report.

IV. Payroll Close Process (OHR)

A. Office of Human Resources Processing, Records & Payroll Section

On the Monday after the end of the pay period, OHR's Processing, Records & Payroll Section sets new pay
period dates. Once the new dates are set in
the new pay period or "Last Pay Period" and the closing or processing pay period will appear. The
Processing, Records, & Payroll Section then runs the following reports for the entire Department:
, which reflects employees who have not clocked out, and
reflects employees who have clocked more or less than 80 hours. The OHR Processing, Records, & Payroll
Section works with timekeepers on the Monday and Tuesday after the end of the pay period to resolve any

issues reflected on these reports. The Section runs reports continuously until all active employee exceptions are resolved in the system.

Tuesda Record period	occessing, Records & Payroll Section runs the and the again on the ay afternoon after the pay period closes, to ensure that there are no exceptions. The Processing, its & Payroll Section then locks out timekeepers, prohibiting them from accessing or processing pay data. Once Processing, Records & Payroll Section locks all users out of the Section runs lowing reports:
1.	- Reflects employees who did not clock out on one or more days.
2.	- Reflects employees who have clocked more or less than 80 hours. The 80 Hour Report is paired with the which reflect employees who are resigning, retiring, or being terminated.
3.	Reflects additional duty for technicians who work in the K-9 unit. The Processing, Records & Payroll Section reviews their timesheets for check marks to ensure that additional duty is added correctly.
4.	Reflects employees such as senior sworn staff who earn night differential and all senior staff in irregular time codes, who are not permitted to earn beyond a set salary cap, and who are therefore ineligible to earn additional duty and premium pay. Those employees can earn overtime only in rare circumstances, and since their salary is already very close to the limit, their pay must be monitored.
5.	- Paired with the retro/corrected time and attendance log submitted by the timekeepers.
need to	ding on the output and analysis of the above reports, the Processing, Records & Payroll Section may be edit employee timesheets in order to rectify any outstanding issues. If the Section makes any lastedits, it must rerun the reports.
	Tuesday afternoon and Wednesday morning after the pay period closes, the Processing, Records & Section runs the following reports:
1.	Reflects employees who have obtained leave advancement or who have used any type of leave that has resulted in a negative leave balance. Timekeepers pair with so and certification reports. The Processing, Records & Payroll Section checks each employee with a negative leave balance to see if their so on file and reviews the certification report to ensure that the amount of leave authorized and the leave actually used are not over the maximum amount approved. The time and attendance supervisor works with the timekeepers to determine the resolution for employees who do not have a on file. The Department places employees on leave without pay (LWOP) status if they do not have sufficient leave to transfer to resolve the negative leave balance. Per General Order employees cannot transfer annual and compensatory leave to offset sick leave. The Department will deduct additional

time from the employee's annual and compensatory leave balances if an employee's absence

exceeds the 240-hour maximum for advanced sick leave.

2.	- This report determines if employees can accrue annual and sick
	leave for the pay period. Employees who have reached 80 hours of cumulative unpaid leave (such
	as LWOP) during the processed pay period are ineligible to accrue annual and sick leave for the
	period. Employees who were ineligible to accrue annual and sick leave in a previous pay period
	due to their non-pay status and who have not reached 80 hours of cumulative unpaid leave in the
	processed pay period will accrue annual and sick leave for the period. The Processing, Records &
	Payroll Section runs the which is matched to the

The Processing, Records & Payroll Section run and document all reports on the HR Operations

The Section prints the checklist and reviews for the following areas for completion:

- Lock out pay period in
- Run the following:



Check highly compensated employee timesheets

Once the Processing, Records, & Payroll Section has completed and reviewed the checklist items, the Section supervisor delivers the form to the systems manager.

B. OHR Systems Manager

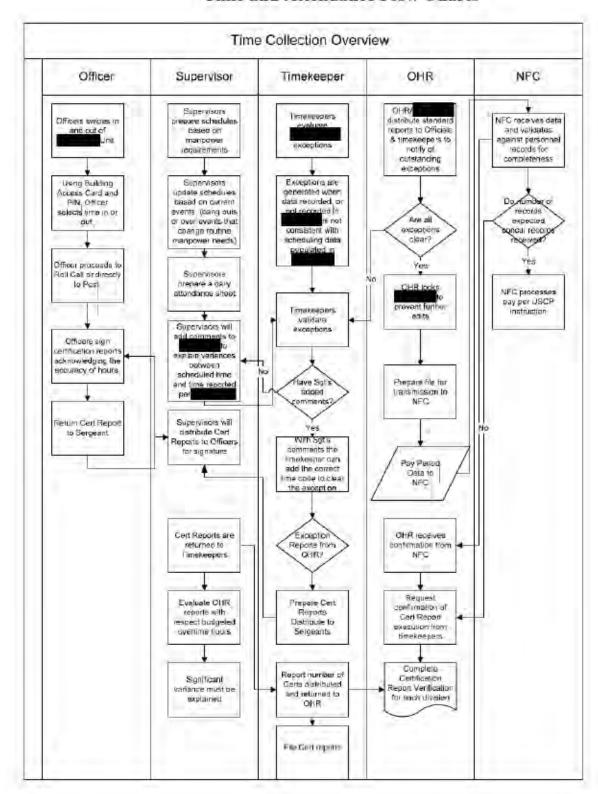
Upon receiving the Payroll Close Process Control Checklist, the systems manager runs the following reports in the before generating the payroll file:

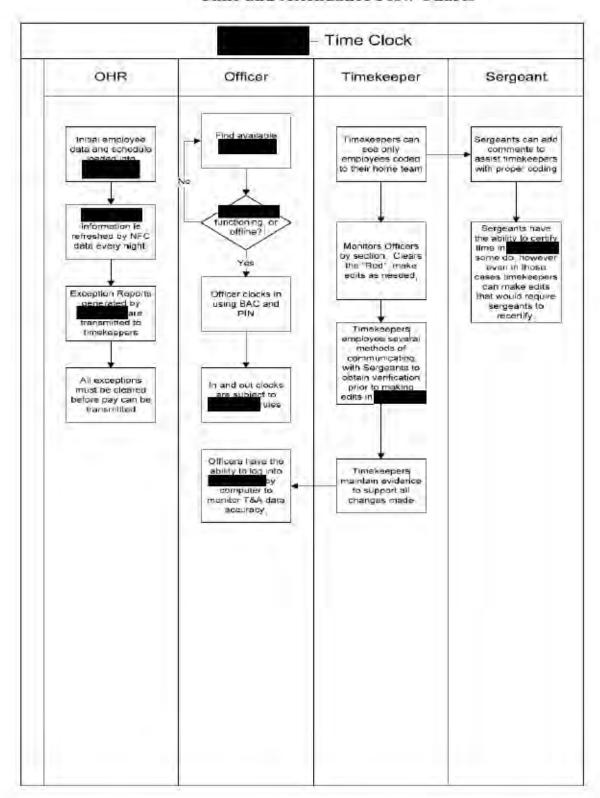
- This report reflects all active employees unassigned to a team.
 Unassigned individuals may not have accurate time and attendance information.
- This report reflects all employees who have exceeded 64 hours of additional duty pay and; therefore, NFC will cap when payroll is processed. A hard copy of this report is printed and retained.
- This is the report referenced above that is run by the OHR Processing, Records & Payroll Section. The systems manager runs the report from and verifies that the timekeeper made appropriate edits before transmitting data to NFC. A paper copy of this report is printed and maintained.

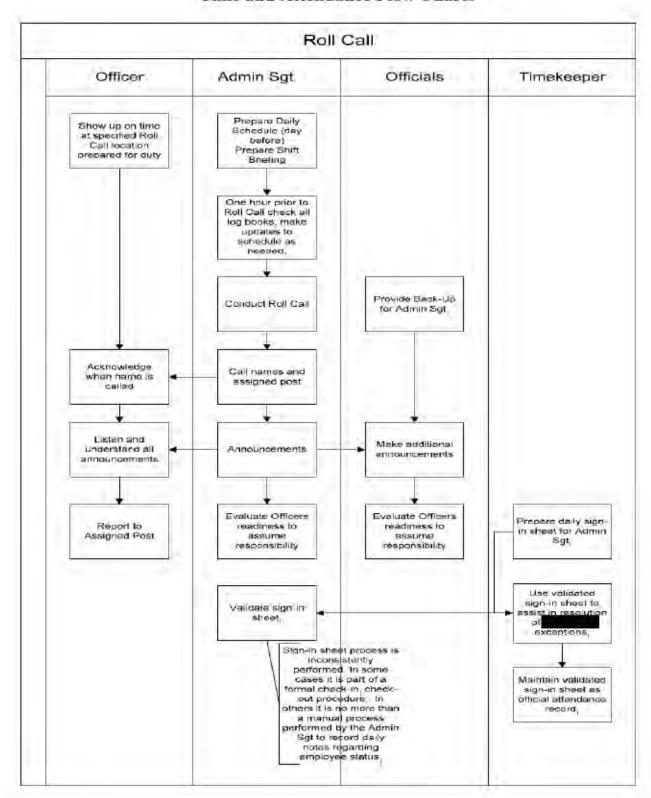
After completing all three reports, the systems manage	er logs into	te the payroll file and
transmit it to NFC. Once the export is complete, the s	ystem sends a message to the	inbox
indicating whether the job was successful. The systen	ns manager then enters the	job scheduler
and changes the date parameters for the nightly recalculated	ulation jobs to reflect the current	t pay period.
automatically performs a full recalculation	of timesheets each night; however	ver, the date
parameters for the recalculation must be reset in	at the end of each payroll	cycle.

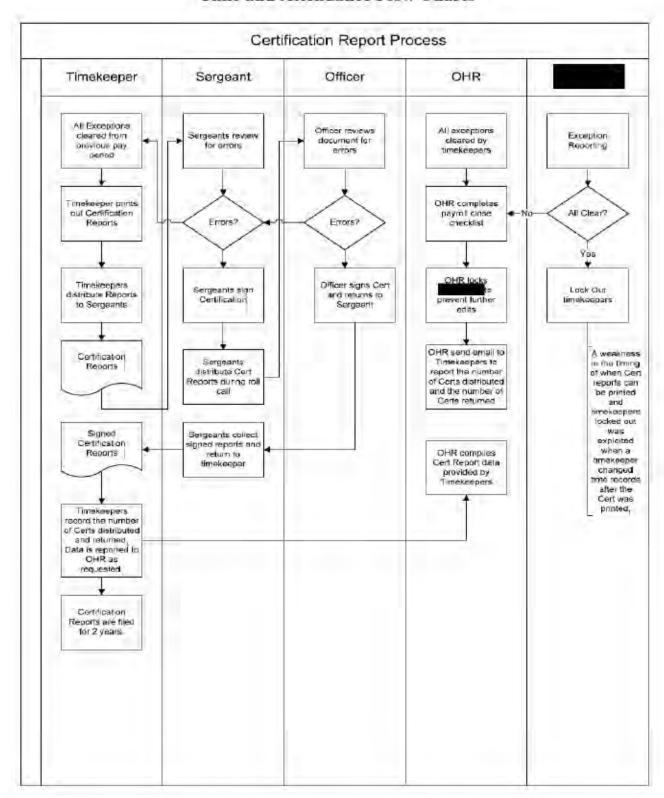
V. Key Controls

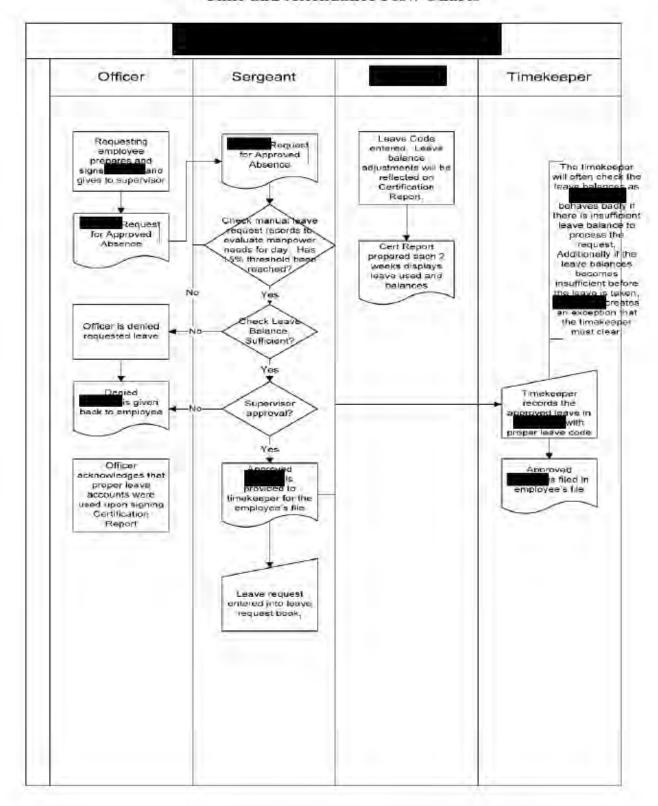
OHR's Information Systems (HRIS) Manager.
Only specific individuals that OHR assigned such roles such as timekeepers and the OHR Processing, Records & Payroll Section, can make changes to hours recorded on timesheets. Corrective actions a timekeeper performs such as an overwrite timesheets are identified by the timekeeper's ID number in
The timekeeper or supervisor must assign all overtime to an approved additional duty code.
The employee's supervisor predetermines an employee's shift and then entered into the system. An employee is paid, and the system automatically determines unpaid hours by their scheduled shift. A timekeeper must correct any exception created by a deviation from the shift. Timekeepers with proper approval and support from the employee's supervisor can process changes to scheduled hours.
Timekeepers print certification reports on the Monday following the end of each pay period. The Processing, Records & Payroll Section provides these reports to supervisors to review. The supervisor then forwards the report to each employee to sign to indicate his or her verification and certification of hours worked. Timekeepers are responsible for emailing a completed support no later than the second Wednesday of the new pay period. The support no later than the second Wednesday of the number returned, and the number of prior-period reports returned.
An employee requesting that a substitute take their assignment for additional duty must prepare and sign a Form. The substitute employee and each employee's supervisor must sign this form. The substitute employee may find one alternate substitute with the approval of a section commander, but the employee may not substitute additional duty more than twice.
An employee is not allowed to work more than 64 hours of additional duty in a given pay period.
Employees must submit a leave slip to their supervisor to request approved leave. If an employee takes unscheduled leave, they must complete a submit it to their supervisor after returning from leave. Supervisors must provide approved to timekeepers for entry into
Each division performs daily roll calls to supplement time clocks in accounting for employees.
If the timekeeper makes a retroactive adjustment/correction, the timekeeper must submit a to OHR's Processing, Records & Payroll Section. Both the timekeeper and the division commander should sign the Time and Attendance Correction Log/Sheet.

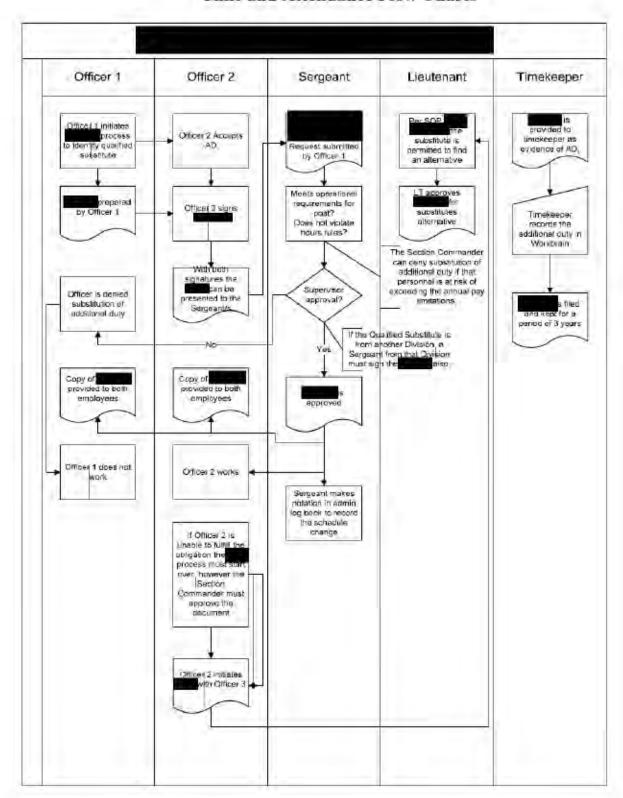


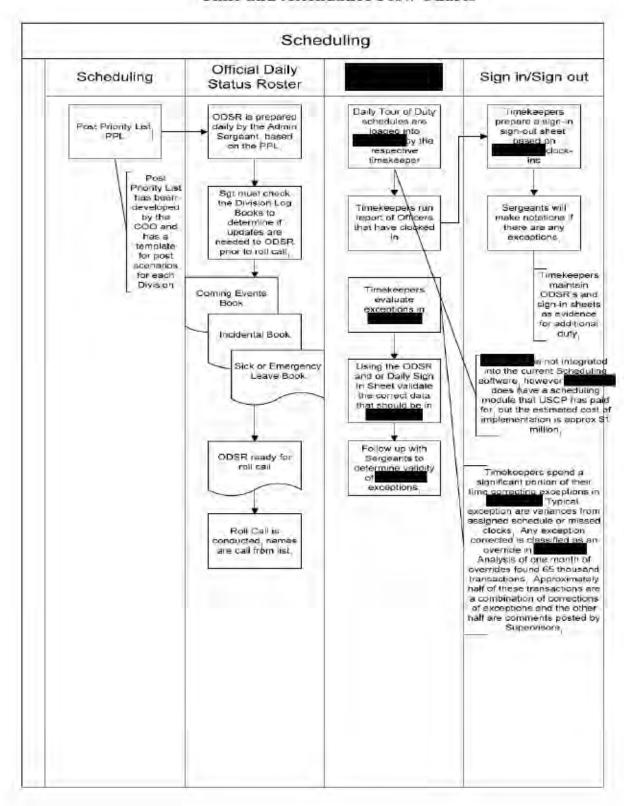


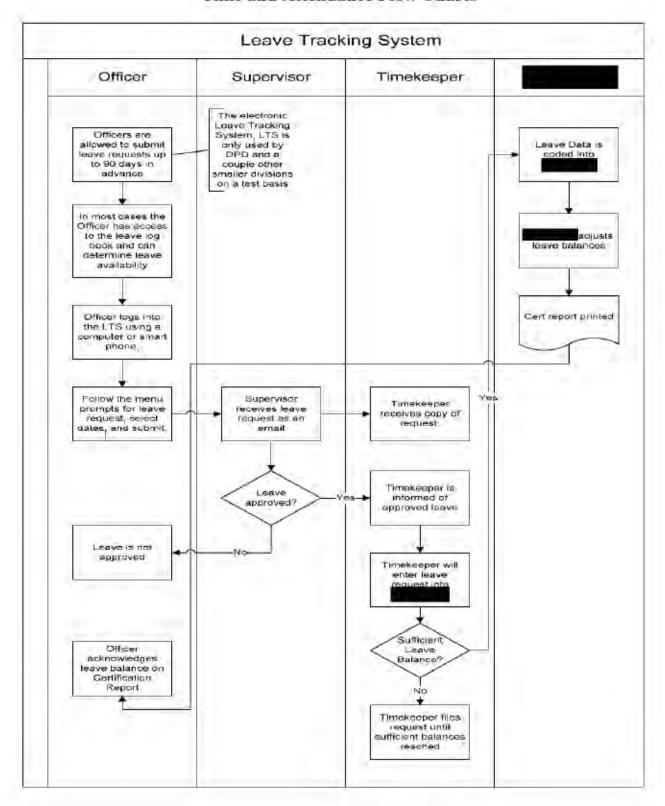






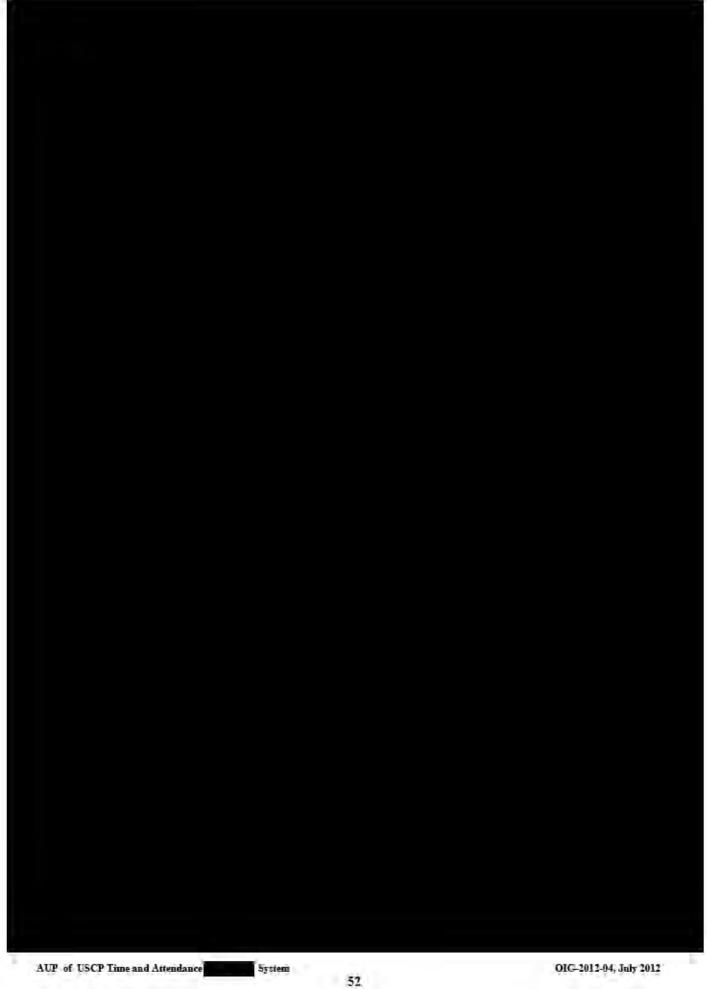


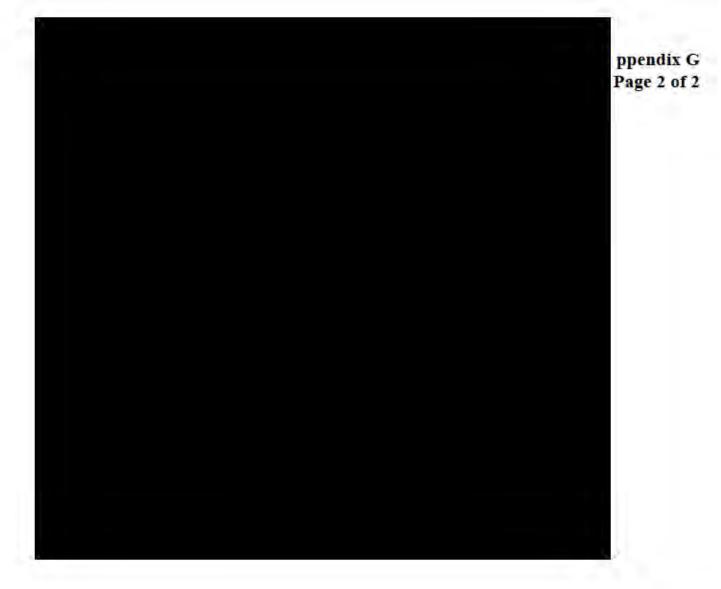




Roll Call Locations

Division	Location	# Roll Calls	# WB Units at Roll Call Location
House	Longworth Building	6	5
Capitol	CVC	8	5
Senate	Headquarters	4	4
LOC	Madison Building	4	3
PMRD	Fairchild	8	6
	Offsite Delivery	1	2
DPD	Headquarters	3	1
Communications	Headquarters	3	2
Command Center	Headquarters	3	1
HIRD	67 K Street	2	2





Graphical Ratio of Time Clock Usage and Roll Calls at Specified Locations

