



PUBLIC WORKS SUPERVISOR OVERTIME:
City rules allowing overtime need clarification

A REPORT FROM THE CITY AUDITOR
October 2006



Office of the City Auditor
Portland, Oregon



CITY OF
PORTLAND, OREGON

OFFICE OF THE CITY AUDITOR
Audit Services Division

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October 17, 2006

TO: Tom Potter, Mayor
Sam Adams, Commissioner
Randy Leonard, Commissioner
Dan Saltzman, Commissioner
Erik Sten, Commissioner
Susan Keil, Director, Portland Office of Transportation
David Shaff, Administrator, Bureau of Water
Ken Rust, Interim Chief Administrative Officer, Office of Management & Finance
Yvonne Deckard, Director, Bureau of Human Resources

SUBJECT: *Audit – Public Works Supervisor Overtime: City rules allowing overtime need clarification, Report #335*

Attached is Report #335 containing the results of our audit of Public Works Supervisor overtime in the Bureau of Water and the Portland Office of Transportation/Bureau of Maintenance. This report evaluates the City's administrative rules concerning this job class, which although exempt from overtime compensation has a specific exception to that rule, when supervisors are supervising staff who are also in an overtime status. The audit was requested by the Bureau of Human Resources and was included in our annual audit schedule. We conducted the audit in accordance with generally accepted government auditing standards.

As a follow-up to our recommendations, we ask the Director of the Portland Office of Transportation, the Administrator of the Portland Water Bureau and the Director of Human Resources to provide a status report in one year, detailing steps taken to address the report's recommendations. This status report should be submitted to the Audit Services Division and coordinated through the Commissioners in Charge of Transportation, Water, and Human Resources.

We appreciate the cooperation and assistance we received from personnel in the Portland Office of Transportation, the Bureau of Maintenance, the Portland Water Bureau, and the Bureau of Human Resources in conducting this audit.


GARY BLACKMER
City Auditor

Audit Team: Drummond Kahn
Amoy Williamson

Attachment

PUBLIC WORKS SUPERVISOR OVERTIME:

City rules allowing overtime need clarification

Introduction

At the request of the Bureau of Human Resources, the Audit Services Division performed a review of the overtime practices of Public Works Supervisors (Supervisors) employed by the City of Portland to determine compliance with Human Resources Administrative Rule 8.03.

This is the Audit Services Division's second compliance audit of the Bureau of Human Resources Administrative Rule 8.03. We previously audited the rule regarding absences of less than one day as it applies to all FLSA exempt employees at the City of Portland. That report, *Partial Day Absences for Exempt Employees* (Report #327), was published in May 2006.

The Fair Labor Standards Act (FLSA) is the primary federal law governing how certain types of employees must be paid. The City assigns most of its employees into two basic categories, FLSA exempt and FLSA covered. FLSA covered employees are hourly employees who are eligible for overtime compensation. FLSA exempt employees are paid an annual salary regardless of the number of actual hours worked and are not generally eligible to receive overtime compensation. FLSA regulations provide that public employers may establish policies and/or pay systems "pursuant to principles of public accountability". The City's policy permits the payment of overtime to selected categories of exempt employees, such as Public Works Supervisors.

In accordance with the federal regulations, the Bureau of Human Resources' Administrative Rule 8.03 states in general that FLSA exempt employees are not eligible for overtime hours worked in excess of 40 hours during any workweek except for "specific and/or emergency exceptions."

This audit reviews the “specific exception” of Administrative Rule 8.03 as it relates to the City’s Public Works Supervisors only.

According to Administrative Rule 8.03, with the approval of the Bureau Director, Public Works Supervisors I and II are eligible for overtime compensation when they *supervise a field crew working overtime* or when they *respond to urgent service situations* such as, but not limited to, weather related emergencies, infrastructure system failures and providing mutual aid to other bureaus and/or agencies responding to urgent situations.

As shown in Figure 1, overtime and comp time costs for Public Works Supervisors were significant, and have doubled since 2003. According to Bureau of Maintenance management, a major portion of the increase in overtime costs can be attributed to the emergency situations of collapsing infrastructure and other weather related incidents.

Figure 1 Overtime compensation and “comp time” cost of Public Works Supervisors

Bureau	Employees	2005	2004	2003
Maintenance	26	\$231,803	\$230,757	\$132,966
Water Works	12	\$186,501	\$139,502	\$71,649
TOTAL	38	\$418,304	\$370,259	\$204,615

Source: Payroll Processing Services, Bureau of Financial Services

Audit scope, objectives and methodology

The objectives of this audit were to determine if the bureaus’ overtime practices regarding Public Works Supervisors were in compliance with Bureau of Human Resources Administrative Rule 8.03 and if internal controls regarding the payroll process of the overtime compensation were adequate. To accomplish this objective, we reviewed Administrative Rule 8.03 and interviewed Bureau of Human Resources management to understand Human Resources’ interpretation of the rule. We interviewed bureau managers, Public Works Supervisors, timekeepers and payroll staff to determine their understanding of

Administrative Rule 8.03, and to identify the internal controls in place to ensure compliance with the Rule.

We focused our review on the Bureau of Water Works and the Portland Office of Transportation's Bureau of Maintenance because all of the City's Public Works Supervisors are currently located in these two bureaus. We selected a judgmental sample of Supervisors' time reports to test for compliance with Administrative Rule 8.03, and reviewed the effectiveness of internal controls for ensuring compliance with Rule 8.03.

As part of our testing, we reviewed the Supervisors' time reports for two pay periods in FY 2005-06 and compared the overtime hours claimed by the Supervisors to the time reports of work crews charging overtime on the same dates. We also reviewed time reports and conducted interviews to determine if Supervisors were being paid overtime for attending meetings and training during non-working hours. In addition, we reviewed the payroll process to determine if controls were adequate to ensure that overtime hours claimed were approved.

We focused our testing during the Winter and Spring of FY 2005-06, since this was a period of high overtime usage.

We conducted this audit in accordance with generally accepted government auditing standards.

Rule 8.03 needs clarification

According to Bureau of Human Resources management, "supervising" as used in Administrative Rule 8.03 means that a Public Works Supervisor must be continually on site with a field crew working overtime in order to be paid overtime. Although the bureaus advised us they were unaware of this interpretation of the Rule, it also does not appear they discussed their interpretation of the overtime exception with BHR. Bureaus listed specific cases when they felt supervisory overtime was warranted. BHR told us that in many of these cases, overtime is not appropriate, as the activities concerned planning and organizing for overtime work, not actual supervision of the crew working overtime, and violates BHR's interpretation of the Rule.

BHR's interpretation of Rule 8.03 may not have been clearly communicated to Bureau managers and Supervisors, and the language of Administrative Rule 8.03 does not state that a Supervisor must be continually on site with the overtime crew in order to be eligible for overtime compensation. Administrative Rule 1.02 however, gives the Director of Human Resources authority for the interpretation and application of the Rules.

In interviews with Public Works Supervisors in both bureaus, we were told that overtime work is both planned and performed on an emergency basis as needed. Supervisors told us that their responsibilities and actual number of hours spent on-site during the time their field crews are working overtime depend on the complexity of the individual projects.

Supervisors report that their supervision of field crews working overtime generally entails:

- planning and scheduling of overtime work
- calling out the crew members
- setting up the work to be accomplished
- providing both on-site and remote supervision as needed
- checking and acquiring materials and parts needed
- coordinating with the public and affected customers, other jurisdictions and utility companies
- reviewing plans and other blue prints as necessary
- interacting with the press, the Fire Bureau, and or the Police Bureau
- checking safety issues related to the site to ensure that accidents do not occur
- preparing project reports to the bureau and other agencies

The Supervisors are constantly available to field crews by cell phone and radio communication, and may return to the site to review the completion of the work and to assess the need for follow-up work.

Supervisors view themselves as being ultimately responsible for the execution and completion of the overtime projects.

Managers, Supervisors and payroll staff in both bureaus indicated that Supervisors are eligible for overtime compensation when performing such supervisory functions in connection with a crew working overtime whether or not the Supervisor is on-site with the overtime crew.

According to Bureau of Human Resources management we spoke with, overtime compensation charged by these Public Works Supervisors is contrary to City Council policy enacted through implementation of HR Administrative Rule 8.03, to eliminate overtime pay for exempt employees. The exception for Public Works Supervisors was intended to be extremely narrow. We were also told that BHR met with the Bureaus of Transportation, Environmental Services and Water to discuss the changes in overtime for exempt employees. At that time the bureaus advised BHR that the issue for Public Works Supervisors was one of fairness -- if the crew was being paid overtime and the supervisor was on site with the crew and not receiving overtime, the supervisors may make less money than the crew.

Based on that information, the exception for Public Works Supervisors was created. BHR also had informed management that compensation for being on-call was outside the scope of the overtime exception. Finally, according to BHR, if an HR Administrative Rule is unclear, or the bureau is unsure of the interpretation of the HR Administrative Rule as it is written, it is incumbent upon the bureau to contact BHR before applying their interpretation of the Rule.

Most overtime hours in compliance with City Administrative Rule

Except for a few instances, we found that overtime hours we reviewed in both bureaus were generally in compliance with the Bureau of Human Resources' Administrative Rule 8.03. Supervisors' overtime hours which did not appear to be in compliance with the Rule as interpreted by the Bureau of Human Resources, still appear to have been charged consistent with the Bureaus' and or employees' understanding of the Rule.

One pattern of Supervisors' overtime charges did not appear to be in compliance with Administrative Rule 8.03. We found that Supervisors in the Bureau of Maintenance who are assigned to the Environmental Systems Division are paid 2 hours per day (14 hours per week) of overtime compensation on a rotating basis for on-call duty on swing and graveyard shifts. This on-call requirement is a part of the Class Specification of the Supervisors' position. This practice by the Bureau of Maintenance has been in effect since January 2002, and Bureau managers reported that they believed the practice had been approved by the Bureau of Human Resources. However, we found no documentation or evidence that the Bureau of Human Resources had approved this practice.

Overtime compensation for on-call duties is not in compliance with Administrative Rule 8.03. The Rule states that eligibility for overtime compensation for Public Works Supervisors must be when they are either supervising a crew working overtime or in emergency situations. In the case of on-call duties, no crew is working overtime; therefore overtime compensation for on-call functions does not appear to be appropriate.

At the request of the Bureau of Human Resources, we also reviewed overtime hours paid to a Supervisor in the Water Bureau for training sponsored by the City. According to the Supervisor, this was mandatory training held on his day off for which the overtime was authorized by his manager.

In the sample we selected, with the exception listed above, we found no evidence of overtime compensation to Supervisors for attending meetings and training during off duty hours. Managers in the bureaus told us that the practice is generally not allowed.

We were also told by Water Bureau staff of isolated instances in which overtime hours were paid to Supervisors when they were not supervising field crews who were working overtime. We verified that this did occur in the Water Bureau on a few occasions. According to the Supervisor, some of these overtime hours were spent on learning the new maintenance management system and making adjustments to new processes. Such work does not qualify for overtime payment according to Administrative Rule 8.03.

Some Time Reports not Properly Authorized

Administrative Rule 8.03 also requires that in order for the Public Works Supervisors to be eligible for overtime compensation when supervising a field crew working overtime, approval by the Bureau Director is necessary. We found no indication that this procedure was being followed. We discovered that several of the Supervisors' time reports in the Water Bureau were not signed or approved by a manager or the Bureau Director, and on other occasions, time reports were both signed and approved by the same individual. A timekeeper we spoke with told us that the practice of requiring signatures of either the Supervisor or manager had been discontinued. Some of the Supervisors said they were not aware that time reports required independent authorization and signature.

Some Overtime Granted to Individuals who worked less than a 40-hour week

Our review also indicates that some Public Works Supervisors were compensated with overtime pay although they did not work a total of 40 hours in the workweek. The hours may not be averaged over two or more weeks and paid leave time is not considered time *worked*. One Public Works Supervisor worked a flex schedule of 36 hours in the first week and 44 hours in the second over a two week period. Therefore the hours worked between 36 and 40 are not overtime hours under FLSA regulations. We also found that Supervisors were paid overtime during weeks when the total number of hours for the workweek included vacation and/or sick leave and holidays.

Recommendations

To address the problem of inappropriate overtime payments and misunderstanding regarding Administrative Rule 8.03, we recommend that:

1. The Bureau of Human Resources clarify Administrative Rule 8.03 regarding the "specific exception" as it relates to Public Works Supervisors.
2. The Bureaus of Maintenance and Water discontinue payments for overtime hours which are not in compliance with Administrative Rule 8.03.
3. Public Works Supervisors be required to submit a signed time report and that all such time reports be approved by an appropriate manager or director assignee, per delegated authority.

RESPONSES TO THE AUDIT




Office of Mayor Tom Potter
City of Portland

MEMORANDUM

DATE: September 25, 2006

TO: Gary Blackmer, City Auditor

FROM: Tom Potter, Mayor 

CC: Commissioner Adams
Commissioner Leonard
Commissioner Saltzman
Commissioner Sten

SUBJECT: Comments on Final Draft of audit of Public Works Supervisor Overtime (Report #335)

Thank you for your review of the City's Public Works Supervisor overtime. I fully support the need to clarify Bureau of Human Resources (BHR) administrative rules regarding on-site supervision and the practices around supervisors "on-call" duties. Further clarification of these administrative rules should improve existing policies already in place throughout the City's Public Works bureaus.

I appreciate the work being done by BHR to clarify these rules. This audit makes it clear that Public Works Supervisors should be aware that required signed time reports need to be submitted and approved by the appropriate authority and that the Water Bureau and Bureau of Maintenance must discontinue payments for overtime hours which are not in compliance with Administrative Rule 8.03. It is essential that all Public Works Supervisors are aware of the existing overtime policies in place in their bureaus.

I look forward to the successful implementation of these recommendations. This audit is a reminder that further work needs to be done to ensure all City administrative rules are clearly articulated and understood by all City employees.



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September 28, 2006

Gary Blackmer
City Auditor
1221 SW 4th Ave.
Portland, OR 97204

Dear Auditor Blackmer:

I appreciate the opportunity to preview the recent draft report on Public Works Supervisor Overtime indicating that Administrative Rule 8.03 will benefit from increased clarification. This document reflects the high quality of work we have come to expect from the Audit Services Division and provides valuable insight into current practices, giving those in oversight roles a more complete understanding of our operations and management.

I am pleased to note your finding that most overtime hours are authorized in compliance with City Administrative Rule 8.03. However, the trend in increasing overtime hours is less than satisfactory and if unchecked, not sustainable. As Commissioner-in-Charge of the Portland Office of Transportation (PDOT) I have made it an primary goal to find and to rectify whatever inefficiencies may exist in the city's practices and procedures. This report identifies three key recommendations for addressing the instances in which the Bureau of Maintenance may be able to increase compliance with Administrative Rule 8.03. We look forward to addressing these recommendations and incorporating them into our own ongoing efforts to make PDOT the most efficient organization possible. The information provided in this audit will assist my office's ongoing efforts to make PDOT more effective, economical and efficient.

I have also reviewed PDOT Director Keil's response to this audit, and would like to express my support for her thoughtful commentary. Our offices will continue to work with the Bureau of Human Resources to clarify the practical interpretation of Rule 8.03 as the City of Portland grows and changes.

Thank you again for your excellent work and for your concise recommendations. This collaborative process will increase our effectiveness as public servants.

Best,

A handwritten signature in black ink, appearing to read 'S.A. Adams', with a stylized flourish at the end.

Sam Adams
Portland City Commissioner

Cc: Portland City Council
Sue Keil, Director, PDOT
Sam Irving, Director, BOM
John Rist, Business Operations Division Manager, PDOT



Sam
Adams
Commissioner

Susan D.
Keil
Director

Eileen
Argentina
System
Management

Don
Gardner
Engineering &
Development

Sam M.
Irving, Jr.
Maintenance

Paul
Smith
Planning

September 28, 2006

Gary Blackmer
City Auditor
1221 SW 4th Avenue
Portland, Or. 97204

Dear Mr. Blackmer,

The City of Portland Office of Transportation (PDOT) is pleased to respond to the audit regarding clarification of rules allowing overtime for Public Works Supervisors. I appreciate the independent review and work of the Audit Services Division. PDOT supports your finding that the city's rules allowing overtime needs clarification. Thus, we look forward to working with the Bureau of Human Resources (BHR) and the Water Bureau to clarify Administrative Rule 8.03 in a manner that reflects the business needs of the affected bureaus.

The audit makes recommendations to address the problem of inappropriate overtime payments and misunderstanding regarding Administrative Rule 8.03 that we will make every effort to comply with. PDOT will:

- Work with the Bureau of Human Resources and the Water Bureau to clarify Administrative Rule 8.03 regarding the "specific exception" as it relates to Public Works Supervisors.
- Discontinue payments for overtime hours that are not in compliance with Administrative Rule 8.03. We are hopeful that in clarifying this rule that our on-call supervisors fit the specific exception that allows payment for overtime.
- Require Public Works Supervisor to submit a signed time report and require that all such time reports be approved by the appropriate manager or director assignee, per delegated authority.

The Audit finds that in most cases overtime usage and practices were in compliance with the rule. The Audit specifically finds that PDOT was out of compliance in that we compensated the Public Works Supervisors that provide after hour on-call coverage to assemble work crews and deploy resources in response to the City's frequent sewer related emergencies. It is important to note that the City is obligated by a National Pollution Discharge Elimination System (NPDES) permit to provide 24 hour per day response to sewer system blockages and failures. The on-call Public Works Supervisors have been instrumental in assuring compliance with this requirement. Thus, we are hopeful that in working with BHR we can continue this practice relative to the specific exception to Administrative Rule 8.03.

PDOT in working with both BHR and the Water Bureau would like to clarify the interpretation of the rule that suggest the Public Works Supervisors must be continually on site with a field crew working overtime in order to be paid overtime. The Bureau of Maintenance and the Water Bureau have similar operations in that Public Works Supervisors may have multiple crews working through out the city on any given day. It is inconceivable that a supervisor can remain at one job site and be effective in the management of the other crews.

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I believe that clarification of Administrative Rule 8.03 is necessary given the results of your audit. I look forward to collaborating with BHR and BOM on that clarification.

Again, thank you for the opportunity for review and comment.

Sincerely,

A handwritten signature in black ink that reads "Susan D. Keil". The signature is written in a cursive style with a large, prominent "S" and "K".

Susan D. Keil
PDOT Director

Cc

Yvonne Deckard, Director, Bureau of Human Resources

Sam Irving, Director, Bureau of Maintenance

David G. Shaff, Portland Water Bureau Administrator

Tom Potter, Mayor

Sam Adams, Commissioner,

Randy Leonard, Commissioner

Ken Rust, Chief Administrative Officer

Anna Kanwit, Bureau of Human Resources

Kelly Mulholland, Portland Water Bureau

Deborah Sievert-Morris, Bureau of Maintenance



CITY OF
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BUREAU OF WATER WORKS

Randy Leonard, Commissioner
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September 27, 2006

To: Gary Blackmer, City Auditor
Tom Potter, Mayor
Sam Adams, Commissioner
Randy Leonard, Commissioner
Yvonne Deckard, Director, Bureau of Human Resources
Sam Irving, Director, Bureau of Maintenance
Susan Keil, Director, Portland Office of Transportation
Ken Rust, Chief Administrative Officer

From: David G. Shaff, Administrator
Portland Water Bureau

Re: Final Draft of Audit of Public Works Supervisor Overtime (Report #335)

Thank you for the opportunity to review the Final Draft of your audit of Public Works Supervisor overtime and for meeting with me and Kelly Mulholland before its release. While we are in general agreement with the audit report, we have some specific concerns which I will outline below. We look forward to working with the Bureau of Human Resources (BHR), the Portland Office of Transportation (PDOT) and the Bureau of Maintenance (BOM) to clarify Administrative Rule 8.03 in a manner that reflects the business practices of the bureaus affected.

In order to do that, I would like to briefly outline my concerns:

- According to the report, BHR management has indicated to your staff that “supervising” as used in Administrative Rule 8.03 means that a Public Works Supervisor must be continually on site with a field crew working overtime in order to be paid overtime. That interpretation is a surprise to us and I understand it is to BOM as well. Notwithstanding the fact that such an interpretation has not been communicated to the Water Bureau or to BOM management, that interpretation does not make any practical sense, or fails to understand the nature of what a supervisor does for our bureau. On any given workday a PWS for the Water Bureau will supervise multiple crews in the field. We do not have a one-to-one ratio of supervisors to crews. This is true for regular work days as well as for “planned” and “emergency” overtime. For “planned” overtime, we almost always have multiple crews in the field, but typically just one supervisor on duty providing necessary coverage. Emergencies may require us to field just one crew and supervisor, or as was the case last winter, we may have to field multiple crews and more than one supervisor.

Whether working a regular work day or during “planned” or “emergency” overtime, supervisors go wherever they are needed, moving from crew to crew, from site to site, and from field to office as needed in order to ensure that:

- work is being planned, scheduled and coordinated;
- staff and equipment are scheduled and made available;
- materials and parts are acquired;
- coordination occurs with property owners, the public, other utilities, emergency responders and other city agencies;
- plans and blueprints are reviewed and consulted;
- work sites are safe; and
- problems are resolved.

We would never expect the supervisor of a crew working overtime to be on site the entire time. To do so would be incredibly inefficient and wasteful of resources. The supervisor also needs to be in the office attempting to corral materials and resources for the job(s) at hand, check documents, coordinate with other agencies, do paperwork related to the field work, and generally problem solve issues as they arise. Working construction means that you often have to anticipate the unanticipated. We expect our employees to be creative, adaptable and flexible – and our supervisors to problem solve solutions with our crews as issues arise. That cannot be done all in the field.

Indeed, on every occasion in which I have been in the field with a crew, whether it has been planned weekend overtime or at 2:00 a.m. on a main break in the dead of winter, there has always been a supervisor who moves from crew to crew and from field to office coordinating the work that needs to be done and responding to the crews’ and bureau’s need. If they spent their entire time on site, they would not be doing their job correctly or satisfactorily.

Our crews know what they are doing and what needs to be done. They need a supervisor to help them problem solve, get necessary resources and coordinate our response with other crews, city agencies and jurisdictions. Much of that can only be done off site from where the crew may be working.

- I also have concern over the 40-hours worked standard. While it is the minimum for employees covered by the FLSA, it is not the standard used by the City of Portland when compensating its employees. The standard used by the City of Portland is 40-hours paid. Thus, if there is a Monday holiday and we have a Saturday main break that requires an emergency response, we pay our employees overtime. If we did not do the same with our supervisors we would have very few supervisors who would be willing to respond or to forego the time off with their families.

Supervisors in the Water Bureau understand that they have to work long hours to get their regular jobs done and don’t get paid overtime for that. However, when we have

crews in the field, we must have supervisors on duty and working. These circumstances are not their “regular” job and they should be compensated for that.

- Along a similar vein, most of our field crews and supervisors work an altered work week where they work 36 hours in one week and 44 in the other. We split the week in such a way that we comply with the FLSA for our covered employees. We do the same, in effect, for our supervisors so that if they work 4 nine hour days and then have to come in on what would be considered their “Friday off” on an overtime basis, they are paid overtime.

I believe that clarification of Administrative Rule 8.03 is necessary given the results of your audit. However, the clarifications should reflect the current business practices of Water and BOM. They are practices that have been developed in order for the work of the bureaus to get done in the most efficient and productive manner possible.

I look forward to collaborating with BHR and BOM on that clarification.

Again, thank you for the opportunity for review and comment.

cc: Anna Kanwit, Bureau of Human Resources
Kelly Mulholland, Portland Water Bureau
Deborah Sievert-Morris, Bureau of Maintenance

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CITY OF PORTLAND

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Ken Rust, Interim Chief Administrative Officer

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October 10, 2006

TO: Gary Blackmer
City Auditor

FROM: Yvonne L. Deckard
Director, Bureau of Human Resources

SUBJECT: Public Works Supervisor Overtime Audit

I want to thank your office for undertaking an audit of overtime practices concerning Public Works Supervisors as well as for the opportunity to review the final draft of the audit report.

The Bureau of Human Resources will work with City Council and the impacted bureaus to evaluate whether continued overtime for any class of non-represented, Fair Labor Standards Act (FLSA) exempt employees is appropriate. Based on the information contained in the audit, overtime expenses for this classification of employees has grown considerably over the past few years. The amount of overtime compensation for 38 Public Works Supervisors in 2005 (\$418,304) is close to the total amount of overtime compensation for 178 non-represented, FLSA exempt employees for 10 months in 2001 (\$457,066). This is a concern, as in 2002 City Council-adopted a policy (HRAR 8.03) eliminating overtime for nearly all FLSA exempt employees, in part due to questions about overtime costs for FLSA exempt employees who were not legally entitled to overtime. If the decision is made to continue to allow overtime for some non-represented FLSA exempt employees, BHR will work to clarify the language in HRAR 8.03, as you recommend, so that it is closer to the original intent of the stated exceptions and is more easily understood by City employees.

We also fully support your recommendation that payments for overtime hours not in compliance with HRAR 8.03 be discontinued, as well as your recommendation concerning the need for increased accountability for overtime payments that are in compliance with the rule.

Cc: K. Rust
S. Irving
D. Kahn
A. Kanwit
S. Keil
D. Shaff

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Public Works Supervisor Overtime: City rules allowing overtime need clarification

Report #335, October 2006

Audit Team Members: Amoy Williamson

Gary Blackmer, City Auditor
Drummond Kahn, Director of Audit Services

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