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CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL

CHICAGO POLICE DEPARTMENT OVERTIME CONTROLS AUDIT FOLLOW- UP INQUIRY





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**TO THE MAYOR, CITY COUNCIL, CITY CLERK, CITY TREASURER,
AND RESIDENTS OF THE CITY OF CHICAGO:**

The City of Chicago Office of Inspector General (OIG) has completed a follow-up to its October 2017 audit of the Chicago Police Department's (CPD) overtime controls. Based on the Department's responses, OIG concludes that, of the 13 corrective actions related to the audit findings, CPD has fully implemented 2, substantially implemented 2, partially implemented 7, and not implemented 2.

The purpose of the 2017 audit was to determine if CPD effectively managed regular-duty overtime to prevent waste and abuse. Our audit found that CPD's operational controls did not adequately prevent unnecessary overtime, deter abuse of minimum time provisions, or ensure that overtime was paid in compliance with policies and procedures. We also found that CPD management controls did not adequately prevent officer fatigue, control costs, or detect and prevent fraud, waste, and abuse. Finally, OIG found that CPD directives related to timekeeping did not reflect current practice, did not provide adequate detail to ensure consistent application of Department policies, and did not include policies to prevent excessive overtime, prevent officer fatigue, or control costs.

Based on the results of the audit, OIG recommended that CPD,

1. work with the Office of Budget and Management (OBM) to implement an automated timekeeping system that includes the controls necessary to ensure that timekeeping records are accurate, verifiable, and complete;
2. immediately implement the necessary manual controls to prevent the operational errors and potential abuse described in the audit;
3. conduct a routine reconciliation between the data in the Department's management reporting and payroll processing systems;
4. ensure that all CPD members, timekeepers, and supervisors are trained on policies related to timekeeping, and are following and/or enforcing these policies appropriately and consistently;
5. prioritize timekeeping oversight and set a "tone at the top" that emphasizes individual accountability for all CPD members;

6. establish clear expectations regarding unit management responsibilities related to overtime;
7. ensure that supervisors have the tools they need to monitor overtime, and require that they actively use such tools;
8. hold unit management accountable for excessive or unjustified overtime use;
9. ensure that all directives are included in its directives system, are up-to-date, and reflect actual practice;
10. routinely review directives to confirm that the documented policies conform with both CPD's obligations under the current Collective Bargaining Agreements and the Department's current processes;
11. ensure that all directives provide sufficient detail to promote consistent application across the Department;
12. train supervisors how to determine whether overtime is warranted; and
13. limit the number of hours officers may work in a given period, including secondary employment, as is already the practice in other jurisdictions.

In its response to the audit, CPD described corrective actions it would take regarding most audit recommendations, but disagreed with OIG's recommendation that the Department limit the number of hours officers may work in a given period, including second jobs.

In June 2019, OIG inquired about corrective actions taken by CPD in response to the audit. Based on CPD'S follow-up response OIG concludes that the Department has initiated a systemwide overhaul of its overtime system, but that reform is still a substantial work in progress. CPD described several new systems it has introduced to monitor timekeeping and overtime usage. As of September 30, 2019, all members are required to swipe in and swipe out during their regular tour of duty shift using an automated time and attendance system. This system, already used in many other City of Chicago departments, electronically records CPD employees' start and end times. However, CPD does not use the system's biometric component, which is designed to prevent an employee from swiping in or out for another employee.

Further, CPD stated that, in April 2019, it moved overtime requests from a paper-based system to an electronic system called CLEARNET. Among other features, CLEARNET allows CPD members to track overtime requests and supervisors to view requests in real time.

The third technology CPD implemented is Jaspersoft, which allows management to analyze overtime data at an individual, unit, and bureau level. CPD includes overtime data in its CompStat meetings. OIG did not evaluate the effectiveness of these new tools, which would require a new audit with full testing.

Throughout the process of implementing these technologies, CPD conducted multiple trainings for timekeepers, members, and supervisors on new policies and procedures. The Department

has updated 8 out of 17 Department directives related to payroll and timekeeping since the publication of the audit.

We urge CPD to fully implement its new timekeeping and overtime policies, with particular focus on swiping compliance and proper overtime request approval, and to conduct internal audits of the effectiveness of the swiping system and its utilization by Department personnel. While supervisors have more tools to manage overtime in their units, we urge the Department to identify potential patterns of waste or abuse and to provide supervisors with the appropriate training and tools to address such patterns. CPD should also continue to update the remaining directives related to payroll and timekeeping, ensuring that they reflect current practice and are periodically reviewed and updated.

CPD has not implemented OIG's recommendation to create a policy limiting the total hours officers work, including secondary employment, in order to ensure officers are well-rested and ready to effectively serve the public. We continue to urge CPD to implement such a policy.

Below, we summarize our three audit findings and recommendations, as well as the Department's response to our follow-up inquiry.

We thank the staff and leadership of CPD for their cooperation during the audit and responsiveness to our follow-up inquiries.

Respectfully,



Joseph M. Ferguson
Inspector General
City of Chicago

I. FOLLOW-UP RESULTS

In June 2019, OIG followed up on its October 2017 CPD Overtime Controls Audit.¹ CPD responded by describing the corrective actions it has taken and providing supporting documentation. Below, we summarize OIG's 3 findings, the associated 13 recommendations, and the status of CPD's corrective actions. Our follow-up inquiry did not observe or test implementation of the new procedures; thus, we make no determination as to their effectiveness, which would require a new audit with full testing.

FINDING 1: CPD'S OPERATIONAL CONTROLS DO NOT ADEQUATELY PREVENT UNNECESSARY OVERTIME, DETER ABUSE OF MINIMUM TIME PROVISIONS, OR ENSURE OVERTIME IS PAID IN COMPLIANCE WITH POLICIES AND PROCEDURES.

OIG Recommendation 1:

CPD should work with OBM to implement an automated timekeeping system that includes the controls necessary to ensure that timekeeping records are accurate, verifiable, and complete. If designed correctly, such a system will reduce the cost of timekeeping, reduce or eliminate missing data, reduce the potential for inaccurate data, reduce or eliminate inaccurate calculations, and prevent duplicate or overlapping time entries. Furthermore, such a system will foster accountability for CPD members who work overtime, supervisors who review and approve overtime, and CPD management as a whole.

Status of Corrective Action 1: **Partially Implemented**

As of September 30, 2019, CPD began requiring all sworn and civilian CPD members to swipe in at the beginning of their shift and swipe out at the end. In addition, members who work overtime must swipe out at the end of their overtime work.

During October 2019, CPD members swiped in and out of their shifts 69% of the time.

Members attending court must also swipe in and out at each appearance. According to CPD, "this process has been fully implemented at the vast

¹ The 2017 CPD Overtime Controls Audit report is available on the OIG website: <https://igchicago.org/2017/10/03/cpd-overtime-controls-audit/>

majority of court locations, with exceptions where the court location has missing or non-functioning swiping equipment.”

Although the time clocks used by the City include a biometric component designed to confirm the identity of the employee, CPD is not using this function. According to the Mayor’s Office, approximately 12,000 City employees use the biometric component, which requires them to place their hand on a biometric reader. The biometric component is intended to prevent an employee from swiping in or out for another employee.

The Mayor’s Office stated that the City’s aging time and attendance system was unable to successfully accommodate biometric scans for CPD and the Chicago Fire Department (CFD) in addition to the 12,000 employees already using the system.² Specifically, the system rejected an unacceptable number of swipes during pilot testing. The Mayor’s office stated that the City has begun a multi-year process to purchase a new time and attendance system that will allow all City employees to use the biometric component, at which point CPD and CFD members will be required to use it as well.³

Currently, CPD is not using swipe-in and swipe-out data to process payroll. CPD timekeepers continue to manually record hours worked, calculate overtime and compensatory time, and enter hours worked in the City’s payroll system. While the requirement to swipe in and out is a good first step towards accountability, it does not rectify the ongoing substantial risk of error in manual data entry identified in OIG’s audit. CPD stated that it intends to integrate the timekeeping and payroll systems in the future, eliminating manual data transfer.

OIG Recommendation 2:

Pending implementation of an automated system with built-in controls, CPD should immediately implement the necessary manual controls to prevent the operational errors and potential abuse described in this finding. Specifically, the Department should establish controls to ensure that,

- a. application of the minimum time provision is limited to appropriate overtime categories that require travel to work premises;

² CFD is also implementing swipe-in and swipe-out requirements for its members.

³ For more information, see our Advisory on Chicago Police Department and Chicago Fire Department Swiping Practices at: (insert link when posted).

- b. application of the minimum time provision to evidence delivery is limited to situations where the SharePoint system cannot be used;
- c. comp time balances are electronically stored and backed-up;
- d. duplicated or overlapping overtime entries are rejected;
- e. Reason Codes are completed for each overtime entry, generic codes are prohibited, and staff are trained on appropriate application of Reason Codes;
- f. data entry errors and miscalculations are avoided;
- g. overtime for missed lunches and Daylight Savings Time is credited accurately; and
- h. supporting documentation for all overtime transactions is maintained.

Such controls may include assigning a second individual to validate calculations and data entry. Moreover, the design of the new automated timekeeping system should incorporate features taking into account these specific issues.

Status of Corrective Action 2: Partially Implemented

To reduce data entry errors and miscalculations, CPD developed an application called CLEARNET to replace the handwritten Overtime/Compensatory Time Report Card. CPD members use CLEARNET to submit all requests for overtime, compensatory time, personal days, vacation days, baby furlough days, and furlough extensions. CLEARNET automatically calculates overtime hours earned based on the number of hours and type of overtime worked.

- a. CPD stated “on October 18, 2017, the proper application of the minimum time provision was reviewed at a training held for all timekeepers. Approximately 100 timekeepers, backups, and ancillary personnel attended.” In addition, CPD stated that “as a part of the CLEARNET application training, aspects of time-due slip were reviewed with all timekeeping personnel. This training included timekeeper’s ability to review and correct errors within the minimum time provision, review of proper overtime authorization, and adherence to any other contractual or directive guidelines.”
- b. CPD updated its court overtime policy to prohibit use of court overtime for evidence delivery; it is permissible only for court

- appearances requiring physical attendance (and preparation sessions for such appearances).
- c. CPD stated that it is “currently developing an automated time and attendance card that will maintain an electronic record and backup of all compensatory time, along with other contractually provided time off.”
 - d. CLEARNET accepts duplicate and overlapping entries; it is the responsibility of supervisors and timekeepers to identify and reject any such entries.
 - e. CPD said that in CLEARNET “Reason for Working Overtime” is a required field. If a member chooses “other” as their reason, then another required field pops up where the member must provide a reason.
 - f. CPD explained that CLEARNET has controls to avoid basic data entry errors. For example, members cannot submit a request without completing all required fields. In addition, CLEARNET compares start and end times of overtime requests to help prevent common data entry errors.
 - g. According to CPD, members are responsible for following existing policy regarding missed lunches and Daylight Savings Time, which “results in standard entries in CLEARNET.”
 - h. CPD said documentation supporting overtime, such as an arrest report, is stored electronically with the overtime request.

Members cannot view or track their time balances in CLEARNET. Timekeepers still maintain paper time and attendance cards, and manually calculate overtime pay using data hand-copied from the CLEARNET system. Moreover, CLEARNET allows CPD members to make overtime requests that violate Collective Bargaining Agreements and/or CPD policy. Department members, supervisors, and timekeepers are responsible for ensuring that all requests adhere to all applicable rules. CPD stated that it designed CLEARNET to be flexible enough to accommodate future policy or contract changes.

OIG Recommendation 3:

In addition, because management reporting and payroll processing are completed on two different systems involving two data entry points, CPD should conduct a routine reconciliation between the data in the two systems.

Status of Corrective Action 3: Substantially Implemented

In response to our follow-up inquiry CPD stated that “the Department replaced the handwritten Overtime/Compensatory Time Report (CPD-11.608) with an automated CLEARNET application. This new process went into effect April 9, 2019. [...] Because the CLEARNET system begins with computerized entries of overtime performed by the initial requester, the need for secondary or duplicate entries into the CLEAR system no longer occurs.”

However, timekeepers still use a manual process to enter information into the payroll system. First, they compare CLEARNET data to Assignment and Attendance data. Then, timekeepers manually copy CLEARNET data onto the time and attendance cards, and into the payroll system.

CPD said their reconciliation process is the comparison between CLEARNET and the Assignment and Attendance data. This still leaves room for manual transcription errors onto the time and attendance cards and into the payroll system.

OIG Recommendation 4:

Finally, the Department should ensure that all CPD members, timekeepers, and supervisors are trained on policies related to timekeeping, and are following and/or enforcing these policies appropriately and consistently.

Status of Corrective Action 4: Fully Implemented

The Department provided training for members during the rollout of new timekeeping and overtime policies and technologies. CPD stated that it held a training for 100 timekeepers and related personnel, reviewing its timekeeping policies and key findings from OIG’s audit. Timekeepers also attended training during the CLEARNET rollout.

In its follow-up response, CPD stated that its Education and Training Division produces eLearning self-training modules covering all updated directives from the previous month. CPD members are required to complete all eLearning trainings on a monthly basis. CPD stated that since October 2017, topics related to timekeeping and overtime were included in eLearning modules during seven different months.

In addition to monthly trainings, the Education and Training Division published eLearning modules on CLEARNET in April 2019. CPD explained “the first module addresses submissions of overtime and time use

requests, and the second module addresses supervisor authorization, approval of overtime, and time use requests.” Members were required to complete the training within 28 days. However, OIG calculated that, as of July 2019, 71% of CPD members had completed the training. The Department stated that it was submitting compliance requests to all remaining members.

FINDING 2: CPD MANAGEMENT CONTROLS DO NOT ADEQUATELY PREVENT OFFICER FATIGUE, CONTROL COSTS, OR DETECT AND PREVENT FRAUD, WASTE, AND ABUSE.

OIG Recommendation 1:

CPD management should prioritize timekeeping oversight and set a “tone at the top” that emphasizes individual accountability for all CPD members.

Status of Corrective Action 1: Partially Implemented

CPD made several important changes demonstrating that it has prioritized timekeeping oversight. In addition to requiring all members to swipe in and out, CPD began using a reporting system called Jaspersoft that allows for “analysis of overtime use by specific districts, units, ranks, and missions [...]” CPD stated that it reviews overtime data at CompStat meetings. The Department also stated that its CLEARNET application requires all regular overtime to be authorized by a supervisor.⁴ CPD required supervisors to attend a training that addressed “[...] supervisor authorization, approval of overtime, and time use requests.” In addition, CPD’s Inspection Division conducted timekeeping audits of eight CPD units between October 2017 and November 2018.

However, CPD’s response did not describe any steps beyond these timekeeping audits and education efforts to prevent or detect the abusive and wasteful overtime practices identified in the audit, or to audit the effectiveness of the swiping system and its utilization by Department personnel.

⁴ Court overtime does not require authorization by a supervisor. Instead, when a sworn member receives a subpoena to appear in court, the member submits a request to CPD’s Court Section for authorization. All court overtime requests are created after the member attends court and require an authorization number from the Court Section.

OIG Recommendation 2:

CPD management should establish clear expectations regarding unit management responsibilities related to overtime. This may include, but is not limited to,

- a. when and how unit management should review available overtime data; and
- b. how unit management should address patterns of waste or abuse.

Status of Corrective Action 2: Partially Implemented

In its follow-up response, CPD stated that it held meetings with executive officers, district and unit command staff, and district and unit supervisors regarding the overtime allocation plan and the proper use of the Jaspersoft dashboard system. In addition, CPD stated that each unit has a designee trained on the Jaspersoft system to help unit management review and analyze overtime data.

CPD holds unit management accountable by reviewing overtime data at weekly district-level CompStat meetings. According to CPD, “previously, overtime data metrics were only discussed in the area-level strategy meetings within the Bureau of Patrol. CPD’s accountability structure will continue to follow the chain of command, from unit and district-level supervisors who are approving overtime all the way up to bureau chiefs. Because each bureau within CPD uses overtime differently in order to carry out its functions and public safety strategies, bureau chiefs are ultimately responsible for effective management of overtime by units under their chain of command.”

However, CPD did not describe how unit management should address patterns of waste and abuse. The Department stated that it reviews cases for unnecessary use of court overtime and contacts the assigned attorneys as appropriate. In its response to the follow-up inquiry, CPD did not acknowledge the existence of four specific potentially abusive practices—trolling, paper jumping, lingering, and self-appointed DUI guys⁵—even though CPD management acknowledged the practices during the audit.

⁵ “Trolling” means actively pursuing situations that result in Extension of Tour overtime, such as: (a) volunteering for calls at or past the end of a shift notwithstanding the fact that fresh officers have already come on duty; (b) actively seeking a traffic, disorderly conduct, or other violation at the end of a shift; and (c) making an arrest at the end of a shift as a result of escalating a situation which would have been within the officer’s discretion to dismiss. “Paper jumping” means requesting to be included on an arrest report despite having little or no involvement in the arrest, specifically for the purpose of earning overtime by being called to court. “Lingering” means reporting to court and increasing overtime pay by staying longer than needed. “DUI guys” means self-appointing as a DUI specialist and taking over DUI arrests initiated by other officers to earn overtime by appearing in court.

Moreover, CPD did not describe any steps taken to train unit management to use Jaspersoft or other tools to identify and address potentially wasteful and abusive patterns. OIG urges the Department to train unit management to identify and address such practices.

OIG Recommendation 3:

CPD management should ensure that supervisors have the tools they need to monitor overtime and require the active use of such tools. This includes, but is not limited to tools that facilitate,

- a. holding individual members accountable for accurately recording hours worked;
- b. holding supervisors accountable for excessive overtime among staff under their supervision; and
- c. holding management accountable for the Department's total overtime spending.

Status of Corrective Action 3: Substantially Implemented

With the implementation of CLEARNET, supervisors have a tool to monitor overtime at the individual level. In CLEARNET, supervisors and unit managers can view their unit's total overtime requests, as well as all requests from a single individual. Supervisors are required to review CLEARNET once per tour.

According to CPD, Jaspersoft facilitates detailed overtime analysis for "specific districts, units, ranks, and missions." Therefore, it is an appropriate tool for holding supervisors and management accountable for overtime use and spending. However, CPD strictly requires the use of the Jaspersoft in only two instances: 1) personnel present data from the system during weekly CompStat meetings; and 2) supervisors are required to review swiping compliance reports for their unit once a month.

OIG Recommendation 4:

CPD management should hold unit management accountable for excessive or unjustified overtime use.

Status of Corrective Action 4: Partially Implemented

In its response to our follow-up inquiry, CPD stated that overtime reviews during CompStat allow senior management to hold unit management accountable through the chain of command. However, the Department

did not identify any other mechanisms that senior management uses to hold unit management responsible.

FINDING 3: CPD DIRECTIVES RELATED TO TIMEKEEPING DO NOT REFLECT CURRENT PRACTICE, DO NOT PROVIDE ADEQUATE DETAIL TO ENSURE CONSISTENT APPLICATION OF DEPARTMENT POLICIES, AND DO NOT INCLUDE POLICIES TO PREVENT EXCESSIVE OVERTIME, PREVENT OFFICER FATIGUE, OR CONTROL COSTS

OIG Recommendation 1:

CPD should ensure that all directives are included in its system, are up-to-date, and reflect actual practice.

Status of Corrective Action 1: Partially Implemented

There are 18 Department directives under the index category of Payroll and Timekeeping. CPD has updated eight directives since OIG published the audit in October 2017. The Department published one directive in September 2019. Of the remaining nine, CPD updated five in 2016, three in 2012, and one in 2009. The Department stated that the three directives last updated in 2012 and the one last updated in 2009 do not require substantial revision, and will be updated by the end of 2019. However, as of December 18, 2019, none of the four directives CPD stated it would update by the end of 2019 have been updated in the Department's online directive system.

CPD stated that when a directive is revised, new or edited text is shown in italic font with a double underline. This makes it clear to CPD members which portions have been updated.

OIG Recommendation 2:

The Department should routinely review directives to confirm that the documented policies reflect CPD's obligations under the current Collective Bargaining Agreements and any additional changes to Department processes.

Status of Corrective Action 2: Fully Implemented

CPD explained that “the review of Department directives is a multi-faceted approach....several factors promote the review of directives including identification of newly established best practices, innovations in technology, additional or modified accreditation requirements, Department reform efforts, strategic plans, and improved training and equipment.”

CPD identified several bases for identifying which directives need to be updated. For example, to maintain law enforcement accreditation, a Commission on Accreditation for Law Enforcement Agencies (CALEA) assessor annually reviews the directives related to a random selection of 25% of CALEA standards. CPD reviews those directives as well. Every four years all the directives related to CALEA standards are reviewed as part of the re-accreditation process. CPD management also attends quarterly Illinois Law Enforcement Training and Standards Board meetings and considers if policy changes are needed. Finally, the Research and Development Division is in the process of identifying policies and procedures that need to be updated for compliance with the consent decree.⁶

OIG Recommendation 3:

CPD should ensure that all directives provide sufficient detail to promote consistent application across the Department.

Status of Corrective Action 3: Not Implemented

CPD’s response did not identify any specific terms or guidance in directives that were clarified via edits. Rather, the Department stated that its directives system has a glossary, which defines approximately 800 terms. The glossary, however, already existed at the time of the audit, and CPD’s response did not identify any improvements made to the glossary since that time.

OIG Recommendation 4:

CPD should provide training to supervisors on how to determine whether overtime is warranted. Such training should cover situations described in this report, such as evidence delivery, phone calls, e-mails, trolling, lingering, and paper jumping.

⁶ The consent decree in *Illinois v. Chicago*, entered on January 31, 2019, and effective on March 1, 2019, subjects broad-reaching reforms of CPD’s policies and practices to federal court supervision.

Status of Corrective Action 4: Partially Implemented

CPD updated its court overtime policy to ensure that this category of overtime cannot be used for evidence delivery; it is permissible only for physical attendance of court appearances (and preparation sessions for such appearances). Evidence delivery is allowed only with the unit supervisor's authorization. CPD also automatically enrolled all members in "a monthly training module containing all directives that have been created or revised during the previous month. Members are required to review all the directives and indicate that they have done so."

The Department stated that "CPD has zero tolerance for instances where CPD members lie, commit fraud, or engage in any unauthorized practices in order to attain unwarranted overtime pay. Once CPD finalizes its formal training on the new overtime policy and system itself, it will look for opportunities to engage supervisors in training to prevent and mitigate any unauthorized practices CPD members may use to obtain additional overtime."

However, CPD did not acknowledge the occurrence of potentially wasteful and abusive practices. Nor did it describe any training that would help supervisors identify such practices and, more generally, determine when overtime is warranted.

OIG Recommendation 5:

CPD should prioritize officer performance and health by implementing policies that help prevent officer fatigue. Specifically, the Department should limit the number of hours officers may work in a given period, including secondary employment, as is already the practice in other jurisdictions. The goal of such policies is to ensure that officers working in a high stress environment are well-rested and ready to effectively serve the public.

Status of Corrective Action 5: Not Implemented

In response to the audit, CPD stated that it did not intend to implement a policy limiting total work hours and that the "primary responsibility for being fit for duty in every respect must be placed where it belongs—with each officer—unless specific circumstances dictate or necessitate otherwise."

In response to OIG's follow-up inquiry the Department stated, "At this time CPD has not reconsidered placing controls over overtime hours or total hours worked by CPD members." OIG once again urges CPD to

consider implementing a policy to limit total hours worked to help prevent officer fatigue.

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- administrative and criminal investigations by its Investigations Section;
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- compliance audit and monitoring of City hiring and employment activities by its Hiring Oversight Unit.

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- to improve the efficiency and cost-effectiveness of government operations; and
- to prevent, detect, identify, expose, and eliminate waste, inefficiency, misconduct, fraud, corruption, and abuse of public authority and resources.

AUTHORITY

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and 240.

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