October 26, 2010

Amy Kurland, Esquire
Inspector General
Office of Inspector General
The Curtis Center
601 Walnut Street, Suite 300 East
Philadelphia, PA 19106

Re: Water Revenue Bureau – Overtime Policy and Procedures Report

Dear Inspector General Kurland:

As a result of the investigation of overtime utilization within the Water Revenue Bureau’s (WRB) Outreach group, Deputy Revenue Commissioner Bethel held a meeting with the Assistant Manager of that group and the Director of Operations. The following changes went into effect July 1, 2010:

1. Employees are no longer to sign 7:00 – 3:30; actual work hours are to be reflected on the timesheet.
2. A line of “X’s” is to appear after the last person’s name on the overtime authorization record form. Any employee that needs to be added will be reflected on another sheet.
3. Any additions to an already submitted or approved sheet will be submitted in writing to be attached to the original request.
4. No more combining of units on one overtime sheet; a separate overtime sheet will be used if necessary based on the task. i.e. Outreach will have a sheet and people working in the office will be reflected on an Administrative Support sheet.
5. If there are more than one Outreach event taking place on the same day there should be separate sheets.
6. On a sheet where the Assistant Manager was not present at the event, someone that was at the event will be designated as the authorized signor.
7. Lawrence Taylor will not be reflected on any Administrative Support’s overtime sheets without prior approval of his immediate supervisor, Robert DePiano.

On August 4, 2010, the Water Revenue Bureau began an overtime project in the Collections Unit. As a result, Deputy Revenue Commissioner Bethel met with all
WRB managers to review overtime procedures and ensure overtime rules are applied consistently throughout the Bureau. The following was discussed during the meeting:

1. Clarified that although employees are paid for 8 hours a day they actually only work 7.5 on a normal day. Employees must work 8 hours before overtime is earned; therefore, the first ½ is straight time not OT.
2. Clarified employees are not paid for lunch periods.
3. Clarified that the same rules apply to employees working on Saturday’s i.e. they must reflect their actual work hours. Employees cannot reflect a lunch period on the sheet but leave early because they did not take the lunch.
4. Verified that a line of “X’s” is to appear after the last person’s name on the overtime authorization record form. Any employee that needs to be added will be reflected on another sheet.
5. Clarified that if managers need additional help to complete an overtime task from staff outside of their division they must make a request to the manager of the other division and not ask employees directly.

The report prepared by your investigator also recommended that payroll controls are put in place to prevent the improper application of overtime. Not only are timesheet records reviewed periodically, we also meet quarterly with all departmental supervisors and managers to discuss payroll issues and other related topics. In response to this investigation and internal review of overtime records, Revenue Human Resources will address overtime rules/procedures with all supervisors and managers during this quarter’s meeting. Our Administrative Services Division has been instructed to also conduct detailed quarterly audits of random payroll records to verify that rules are being followed. This report will be presented to me for review.

Thank you for your assistance with this matter.

Sincerely,

Keith J. Richardson
Revenue Commissioner

Cc: Honorable Michael A. Nutter, Mayor
     Clarence D. Armbrister, Chief of Staff
     Rob Dubow, Finance Director
     Richard Negrin, Managing Director
     Michelle Bethel, Deputy Revenue Commissioner
     Delores U. Davis, Administrative Services Director