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8 1976

Mr. George H. Darden  
Assistant General Counsel  
Equal Employment Opportunity Commission  
1531 Stout Street  
Denver, Colorado 80202



LM089085

Dear Mr. Darden:

We have completed our survey of the time and attendance procedures and practices as they relate to Group III of your office. Each of the following points was discussed with you and your administrative officer on November 13, 1976. You both expressed the belief that a survey of either Group I or II would not have disclosed the same deficiencies. While we are unable to address that area specifically, we believe that the deficiencies are of a nature which warrant your immediate attention and corrective action. In addition, we believe the rules and regulations are intended to be applied consistently to all employees, regardless of the organizational element to which they may be assigned.

1. The Equal Employment Opportunity Commission (EEOC) uses the General Services Administration's time and attendance system. We believe the system is sound if fully implemented. We have found two areas where you have not fully implemented this system and therefore do not gain all the control it offers. The first area is that under your current practice, the supervisors do not certify the bi-weekly time cards of employees under their control as required. Rather, the administrative officer certifies all time cards. We discussed this area with the administrative officer stating that we felt the team leaders would be in the best position to certify time cards. She indicated that team leader position descriptions were recently changed and that incumbents could not certify time cards. Accordingly, that responsibility should be fulfilled by group leaders aware of their employees' attendance.

The second area is that time cards are not posted on a daily basis as required. We believe that instituting this procedure would provide greater control and force daily decisions regarding the charging of leave for tardiness and departure before the workday ends. Based on our survey,

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and the many times you have emphasized these areas in staff meetings, it appears that some of your employees have become extremely lax in arriving at work on time and remaining for the entire workday. (See item number 2.)

2. On September 1, 1976, you issued Standard Operating Procedure Number 3 which advises all employees of established duty hours and instituted a sign-in/out procedure. It also reiterates the policy, as spelled out in the General Services Administration time and attendance manual, that all supervisors are responsible for enforcing office hours, lunch period, and leave regulations. We believe the system you have devised is good and should provide the necessary control over those areas if properly implemented and the supervisors carry out their responsibilities.

Analysis of data on the sign-in/out sheets of Group III personnel for the period of September 2 through October 29 (39 working days) disclosed the following.

|   |          |
|---|----------|
| Number of employees                                   | 16       |
| Total number of times tardy                           | 163      |
| Range of number of times tardy                        | 0 to 24  |
| Total number of minutes tardy                         | 2,990    |
| Tardiness range in minutes                            | 5 to 90  |
| Total number of times departed early                  | 35       |
| Total number of minutes early departure               | 850      |
| Early departure range in minutes                      | 5 to 105 |
| Total number of times 14 employees failed to sign out | 119      |

The annual attendance records for this group show that no employee was charged annual or any other type of leave for this tardiness or early departure; rather your supervisors and yourself have chosen to excuse these personnel and thereby substantially reduce the amount of available productive time. This action is contrary to your stated policy and regulations. The manual states that tardiness may be excused when reasons appear adequate; this section however, will not be used to permit habitual or frequent tardiness.

We believe these periods of absence are serious and could affect the programmatic operations of your office. We recommend you take whatever action necessary to assure that duty hour and leave regulations be appropriately and consistently carried out.

3. Our survey also disclosed that some employees were granted administrative leave if their personal automobiles break down on the way to work while others took annual leave under similar circumstances.

7. In reviewing selected travel vouchers, we observed that it seems to be common practice that personnel not report for duty to the office on days of departure for and return from travel status, regardless of what time they actually depart or arrive. Your administrative officer said that some persons are reporting for duty on the day of departure but are returning to their residences to get their luggage. We have observed you departing the office for temporary duty with your baggage and believe you should require your staff to bring their baggage to the office on days of departure. We recommend that you devise and implement a policy requiring employees to report to the office for duty if they can spend a reasonable amount of time, determined by you, prior to departing for the airport or at the end of the work day when returning from travel status.

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We have been advised that the EEOC Internal Audit Staff has never made an examination of the administrative operations of your office.

Thank you for the courtesies and cooperation shown Mr. Permann during this survey.

We would appreciate your comments regarding the matters discussed above and the actions you have taken.

Sincerely yours,

*(Signature)*  
Irwin H. D'Addario

Irwin H. D'Addario  
Regional Manager

cc: Chairman, Equal Employment  
Opportunity Commission  
General Counsel, EEOC  
Internal Audit Staff, EEOC

While the manual provides some discretion regarding situations in which employees may be excused, we believe that granting administrative leave for such reasons is a rather liberal exercise of discretion and should be discontinued.

4. We have noted that it is your practice to grant up to 3 days administrative leave to attend funerals. Regulations make provisions for this type of leave to employees whose immediate relative dies as a result of wounds, disease, or injury incurred as a member of the Armed Forces in a combat zone. Your administrative officer stated that she has advised you that most of this type of leave granted was not in accordance with this regulation.

You stated that it was your position that you have the discretion to grant administrative leave for funerals other than those cited in the regulation. The regulations regarding funeral leave are explicit and leave nothing to the administrator's discretion. Accordingly, we recommend that, for the current leave year, you adjust the annual leave balance for each employee who was improperly granted administrative leave to attend funerals. For those employees who have transferred to other government agencies, you should notify that agency of the number of days by which the employees' annual leave balance should be adjusted.

We understand that you intend to change your policy regarding administrative leave for funerals beginning with the next leave year. We recommend that this policy be changed immediately.

5. The official lunch period for your office is 45 minutes. You have issued numerous memorandums wherein you state that up to 1 hour will be acceptable for lunch. By doing so, you have established policy that the lunch period will be 1 hour. We recommend that you either retract these memorandums and emphasize that the official lunch period is 45 minutes or appropriately extend both the lunch period and the work day.

6. Analysis of selected Annual Attendance Record cards disclosed numerous errors including excessive leave balance carryover and erroneous leave accumulations. In addition, there were no indications that supervisors were reviewing these records semi-annually for accuracy as required. The administrative officer told us she receives a printout for each employee at the end of the leave year and makes necessary adjustments to the Annual Attendance Record cards. Since the attendance records maintained by her are the official records of your office, it is necessary that they be prepared with great care to accurately reflect the employees' attendance record and proper leave balances. Appropriate periodic supervisory review should assure accuracy.

Chief, Distribution Section, OAPS

DEC 8 1976

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Assistant General Counsel  
Equal Employment Opportunity Commission  
1531 Stout Street  
Denver, Colorado 80202

Dear Mr. Darden:

We have completed our survey of the time and attendance procedures and practices as they relate to Group III of your office. Each of the following points was discussed with you and your administrative officer on November 18, 1976. You both expressed the belief that a survey of either Group I or II would not have disclosed the same deficiencies. While we are unable to address that area specifically, we believe that the deficiencies are of a nature which warrant your immediate attention and corrective action. In addition, we believe the rules and regulations are intended to be applied consistently to all employees, regardless of the organizational element to which they may be assigned.

1. The Equal Employment Opportunity Commission (EEOC) uses the General Services Administration's time and attendance system. We believe the system is sound if fully implemented. We have found two areas where you have not fully implemented this system and therefore do not gain all the control it offers. The first area is that under your current practice, the supervisors do not certify the bi-weekly time cards of employees under their control as required. Rather, the administrative officer certifies all time cards. We discussed this area with the administrative officer stating that we felt the team leaders would be in the best position to certify time cards. She indicated that team leader position descriptions were recently changed and that incumbents could not certify time cards. Accordingly, that responsibility should be fulfilled by group leaders aware of their employees' attendance.

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Sincerely yours,

IRWIN M. D'ADDARIO

Irwin M. D'Addario  
Regional Manager

cc: Chairman, Equal Employment  
Opportunity Commission  
General Counsel, EEOC  
Internal Audit Staff, EEOC



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|   |          |
|---|----------|
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IRVIN M. D'ADDARIO

Irvin M. D'Addario  
Regional Manager

cc: Chairman, Equal Employment  
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