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Highlights

Background

The U.S. Postal Service uses overtime to provide flexibility and meet its operational requirements. To aid in efficiently managing overtime, the Postal Service implemented the Overtime Administration System (OT Admin) – a web-based application intended to assist managers and supervisors in administering and tracking overtime for craft employees while ensuring consistency with appropriate collective bargaining agreements.

What We Did

Our objective was to assess whether OT Admin was achieving its intended goals to help managers and supervisors efficiently and consistently assign overtime. We reviewed overtime work hours and grievance payments from fiscal years (FY) 2019 through 2021. Our review included nationwide use of OT Admin by managers and supervisors who manage overtime hours for craft employees. We visited 12 judgmentally selected locations based on overtime grievance costs and OT Admin usage.

What We Found

Overall, OT Admin aids in efficiently and consistently assigning overtime when managers and supervisors use the application in accordance with guidance. However, managers and supervisors did not always use OT Admin to manage employee overtime, instead using a variety of manual processes to assign overtime. This occurred because there was no written requirement to use OT Admin – only an internal best practice – and managers and supervisors were not encouraged to use the application. Additionally, managers and supervisors stated that they were unfamiliar with the application and did not complete OT Admin training. Further, supervisors identified several challenges regarding OT Admin, such as time-consuming entry procedures and inaccurate information in the application.

Recommendations

We recommend management (1) assess who should be required to use OT Admin, develop and issue guidance to required users, and provide and track training for all required users; (2) develop a process to ensure that OT Admin contains accurate overtime data, including timely updates of overtime lists and overtime requirements from local agreements; and (3) assess the feasibility of conducting system enhancements to capture OT Admin historical utilization records and percentages by facility and ensure those records are maintained to determine overall system effectiveness.

Transmittal Letter

OFFICE OF INSPECTOR GE UNITED STATES POSTAL S April 29, 2022				
MEMORANDUM FOR:	THOMAS BLUM ACTING VICE PRESIDENT, LABOR RELATIONS			
	SIMON STOREY VICE PRESIDENT, HUMAN RESOURCES			
	JOSHUA COLIN CHIEF RETAIL AND DELIVERY OFFICER			
	ISAAC CRONKITE CHIEF LOGISTICS & PROCESSING OPERATIONS OFFICER			
	Jozericle C. Poland			
FROM:	Lazerick Poland Acting Deputy Assistant Inspector General for Supply Management and Human Resources			
SUBJECT:	Audit Report – Overtime Administration System (Report Number 21-251-R22)			
This report presents the results of our audit of the U.S. Postal Service's Overtime Administration System.				
We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Amy Jones, Acting Director, Human Resources and Support, or me at 703-248-2100.				
Attachment				
cc: Corporate Audit Res Postmaster General	ponse Management			

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the U.S. Postal Service's Overtime Administration System (Project Number 21-251). Our objective was to assess whether the Overtime Administration System (OT Admin) was achieving its intended goals of helping managers and supervisors efficiently and consistently assign overtime. See Appendix A for additional information about this audit.

Background

The Postal Service uses overtime to provide flexibility and meet its operational requirements. Once employees work over eight paid hours in a day, or 40 paid hours in a week, they are entitled to overtime pay.¹ According to union contracts, employees may request to have their names placed on the Overtime Desired List (OTDL).² Managers and supervisors select employees from the OTDL when there is a need for overtime and select employees with the necessary skills in order of seniority on a rotating basis or based on equitability, depending on the craft. To aid in managing overtime, the Postal Service implemented OT Admin.

OT Admin, implemented nationwide in fiscal year (FY) 2015, is a web-based application designed to simplify the administration and use of the OTDL. The application's intended goals are to assist managers and supervisors in administering and tracking overtime for craft employees. OT Admin is also designed to help users assign overtime more efficiently and consistent with appropriate collective bargaining agreements and local memoranda of understanding (MOU)³ while aiding in reduction of overtime grievances.

OT Admin tracks employee workhours, overtime, and make-up overtime and alerts supervisors when an employee nears eight hours in a service day. OT Admin provides details on employees willing to work overtime on different tours, overtime opportunities, and overtime hours used. Managers and supervisors are responsible for the following actions while using OT Admin:

- Enter or edit overtime details.
- Add or remove employees to or from the OTDL.
- Enter makeup settlements⁴ and assign makeup overtime.

OT Admin was initially only available for use with the city carrier craft to ensure fair distribution of overtime, a contractual requirement unique to the city carrier craft.⁵ OT Admin was designed primarily for the city carrier craft to address a

specific type of overtime grievance — Equitable Distribution of Overtime.⁶ OT Admin is now used to administer overtime for employees in the clerk, mail handler, maintenance, and motor vehicle service crafts to aid in the reduction of all types of overtime related grievances.⁷ During FYs 2015 through 2021, employees filed 2,975,721 overtime-related grievances, resulting in \$337 million in grievance costs. Figure 1 shows the number of overtime grievances and overtime grievance costs for all overtime grievance types.

"The Postal Service uses overtime to provide flexibility and meet its operational requirements."

¹ As specified by union contracts, regular overtime is paid at one and one-half times the employee's hourly rate to non-exempt employees, while penalty overtime is paid at double the employee's hourly rate under specific conditions.

² Employees placing their name on the OTDL will be expected to work overtime when requested by management. This list is generated through OT Admin or generated using a manual document.

³ A local MOU is an agreement between a local Postal Worker Union and the Postal Service.

⁴ All grievance settlements with make-up overtime for the remedy must be entered into OT Admin.

⁵ Article 8 of the collective bargaining agreement for city letter carrier craft requires that every effort be made to distribute equitably the opportunities for overtime among those on the OTDL.

⁶ Grievances that refer to violations of city carrier collective bargaining agreement provisions that require overtime be assigned in a fair manner rather than on a rotational basis or according to seniority.

⁷ OT Admin was implemented for clerk, mail handler, maintenance, and motor vehicle service crafts during FYs 2017 through 2019.

"We reviewed OT Admin usage data for Quarter 3, FY 2021 and found that 1,733 of 4,945 (35 percent) facilities with more than ten craft employees nationwide did not use OT Admin."



Figure 1. FYs 2015 – 2021 Overtime Grievances

not use OT Admin.⁹ See Figure 2 for types of facilities nationwide that did not use OT Admin.



use OT Admin to manage the OTDL. Instead, managers and supervisors used a

variety of manual processes to assign overtime rather than using the application. These manual processes included posted sign-up sheets, printed work schedules

with annotations, and handwritten notes containing color coding and symbols to

Overtime Administration System Usage by Functional Area

monitor and track overtime opportunities and assignments. The handwritten notes

We reviewed OT Admin usage data for Quarter 3, FY 2021 and found that 1,733⁸

of 4,945 (35 percent) facilities with more than ten craft employees nationwide did

Figure 2. Nationwide OT Admin Usage¹⁰

and symbols were sometimes difficult to read or interpret.

Source: Postal Service Labor Relations officials

Source: Postal Service Grievance and Arbitration Tracking System (GATS).

Finding #1: Overtime Administration System Usage

Overall, when used, OT Admin aids in efficiently and consistently assigning overtime when managers and supervisors use the application in accordance with guidance. However, we found that managers and supervisors did not always

⁸ We originally found that 2,079 of 4,945 facilities did not use OT Admin. We removed duplicate counts of each facility which resulted in the final count of 1,733 unique facilities nationwide. We confirmed this data during our site and virtual visits.

⁹ According to headquarters management, facilities with ten or more craft employees should use the application. We applied this criterion to all crafts to consistently analyze OT Admin data.

¹⁰ Other functional areas include Customer Contact Centers, HQ Logistics & Processing – Field, Asset Management – Field Operations Chief Customer/Marketing.

*Thirty-seven of*93 managers
and supervisors
(40 percent)
interviewed stated
that they did not
complete OT
Admin training
because they were
not required to use
the application."

Additionally, during site visits,¹¹ we found that 67 of 93 managers and supervisors¹² (72 percent) did not use OT Admin to assign overtime. Based on our interviews, managers and supervisors did not use OT Admin because it was not required and was only an internal best practice. Postal Service Headquarters management stated that although managers and supervisors are not required to use OT Admin, its use is encouraged to ensure contractual compliance when assigning overtime.

Further, managers and supervisors at the facility level stated that they were not always encouraged by their installation manager to use OT Admin.¹³ However, headquarters sends an automated daily usage report¹⁴ to district and division managers to ensure OT Admin is used at the facility level. District and division

managers stated that when they identified low usage, these reports were sent to the installation manager to encourage increased usage of OT Admin.

Overtime Administration System Training

Managers and supervisors did not use OT Admin to assign overtime because they were either unfamiliar with the application or did not complete training. Thirty-seven of 93 managers and supervisors (40 percent) interviewed stated that they did not complete OT Admin training because they were not required to use the application. For the remaining 56 managers and supervisors who completed training, 51 (91 percent) stated that they completed training over two years ago.

Managers and supervisors suggested that additional training was needed as they were not always familiar with all the functions of OT Admin. District Human Resources personnel provided OT Admin training completion dates for 17 of 93 (18 percent) managers and supervisors. However, district Human Resources personnel were unable to provide dates for the remaining 76 of 93 (82 percent) managers and supervisors. The absence of this data indicates training was not completed or training records were not maintained.

Overtime Administration System Challenges

Further, managers and supervisors identified several challenges that hindered them from using OT Admin to assign overtime. Managers and supervisors stated that the priority is to deliver the mail and input the necessary data into the application can be time consuming. They also stated that the OT Admin does not always reflect an accurate OTDL. Managers are responsible for updating the OTDL to ensure all employees who request to be on the list are appropriately added into OT Admin at the beginning of each quarter. However, supervisors stated that sometimes employee names were missing from the OTDL when they attempted to assign overtime to a craft employee. In addition, OT Admin does not always account for specific overtime rules outlined in local MOUs. For example, a Labor Relations official in one Postal Service district explained that there is an agreement with the local union branch that requires facilities to assign overtime to employees in order of seniority, for city carriers on the OTDL.

Further, the Postal Service does not maintain OT Admin historical use records and percentages by facility to compare usage data to grievance cost. The application only retains 90 days of related overtime data. Maintaining historical data would allow the Postal Service to compare and trend OT Admin usage and filed grievances. This comparison would aid in managing overtime and grievances at the facility level.

Overtime Administration System Benefits

For managers and supervisors using OT Admin, the application assisted them with assigning overtime and establishing OTDLs for the five major crafts. Additionally, OT Admin provided management with contractual guidance in the

¹¹ We judgmentally selected 12 sites based on total overtime grievance costs and OT Admin usage. For all locations we randomly selected managers and supervisors to interview.

¹² Managers and supervisors were responsible for supervising employees in the clerk, mail handler, maintenance, and motor vehicle crafts.

¹³ Installation managers are responsible for encouraging OT Admin usage.

¹⁴ The reports are generated from OT Admin Support.

assignment of overtime. Since the inception of OT Admin, users accessing and using OT Admin have increased, on average, from 9,525 to 15,152, resulting in an increase of 5,627 users from FYs 2015 through 2021. In addition, a specific type of overtime grievance, Equitable Distribution of Overtime, decreased from 13,130 to 8,537 during the same time, resulting in a decrease of 4,593 grievances for the carrier craft as shown in Figure 3.

Figure 3. OT Admin Users and Equitable Distribution of Overtime Grievances



Source: Postal Service GATS and Labor Relations.

During our interviews and site visits, 26 of 93 managers and supervisors (28 percent) used OT Admin. Twenty-three of 26 managers and supervisors (88 percent) stated that they were encouraged by their installation managers to use the system. Managers and supervisors also stated that OT Admin met its intended purpose because it aided in assigning overtime and helped prevent overtime related grievances.

Employees at two of the 12 selected sites – the Macon, GA, Processing and Distribution Center (P&DC) and the Norristown (NRS) Tri-County Branch – used OT Admin¹⁵ and incurred low grievance costs. The number of grievances and costs are illustrated in Figure 4 for both facilities. Managers and supervisors at these facilities stated that OT Admin usage contributed to low grievance activity because it helps assign overtime in accordance with the union contracts. Additionally, union representatives worked closely with the supervisors and craft employees to ensure that overtime-related issues were resolved prior to filing a grievance. Union representatives reviewed the OTDL to ensure contractual compliance, and if an issue arose, supervisors and union representatives worked closely to determine a resolution. Supervisors also stated that they openly communicated with craft employees to help avoid contract violations.

Figure 4. Grievances At Best Practice Facilities Using OT Admin



Source: Postal Service GATS.

When managers and supervisors manually record overtime instead of using OT Admin to make overtime assignments, they may assign overtime

¹⁵ OT Admin usage during Quarter 3, FY 2021. The Postal Service does not track historical OT Admin usage by facility.

inappropriately or incur unnecessary penalty overtime. In addition, when managers and supervisors are not properly trained and OT Admin is not timely updated to reflect employees who have signed up on the OTDL, managers and supervisors may improperly pass over employees when assigning overtime. Using OT Admin improperly may also lead to increased grievance costs and penalty overtime costs. If the Postal Service continues to operate in its current environment without requiring the use of OT Admin, grievance costs are expected to continue to remain at a high level. We estimate the costs associated with these grievances to be \$14,096,661, based on past grievance costs continuing into the future.¹⁶

Recommendation #1

We recommend the Vice President, Labor Relations, in conjunction with the Chief Retail & Delivery Officer, Chief Logistics & Processing Operations Officer, and the Vice President, Human Resources, assess who should be required to use the Overtime Administration System, develop and issue guidance to required users, and provide initial training or refresher training to all required users and track completion of the training.

Recommendation #2

We recommend the **Vice President, Labor Relations**, develop a process to ensure the Overtime Administration System contains accurate overtime data, to include timely updates of the Overtime Desired Lists and overtime requirements from local memorandums of understanding.

Recommendation #3

We recommend the **Vice President, Labor Relations**, assess the feasibility of conducting system enhancements to capture Overtime Administration System historical utilization records and percentages by facility and ensure records are maintained to assess the overall effectiveness of the system.

Management's Comments

Management disagreed with all of the recommendations and disagreed with the sample size used to conduct this audit. In subsequent correspondence, management agreed with the monetary impact. See Appendix B for management's comments in their entirety.

Management disagreed with recommendation 1, stating that a blanket requirement to use OT Admin is not appropriate as overtime administration may involve differences relating to union involvement and local memorandums of understanding that have unique variances. Similarly, identification of specific individuals required to use the system is not appropriate. In addition, administration of training on the OT Admin System is appropriately maintained at the local level. However, management stated that the Vice President, Labor Relations, will issue a memorandum to managers and local leadership regarding the importance of utilizing the OT Admin Tool, the effectiveness of utilization, and the identification of training needs. The target implementation date is October 21, 2022.

Management disagreed with recommendation 2, stating that entries within the OT Admin System, oversight of Overtime Desired Lists, and overtime requirements from local memorandums of understanding are appropriately implemented and managed at the local level. However, management stated that the Vice President, Labor Relations, will issue a memo reiterating the importance of managing use of the OT Admin System and maintaining Overtime Desired Lists and overtime requirements from local memorandums. The target implementation date is October 21, 2022.

Management disagreed with recommendation 3, stating that they assessed the OT Admin System to determine feasibility of maintaining historical data beyond a 90-day historical report. The present system does not have the storage space needed to maintain data beyond 90 days. Additionally, the present system for daily utilization reporting provides management with a current and up-to-date illustration of their entries and their performance with the OT Admin System.

¹⁶ This forecast of potential "funds put to better use" represents the actual or potential costs the Postal Service can avoid as a result of the audit, or potential dollars it could use more efficiently if management takes action to implement and complete OIG recommendations.

Evaluation of Management's Comments

The OIG considers management's comments nonresponsive to the recommendations in the report.

Regarding management's disagreement with the audit sample size, our review included nationwide use of OT Admin by managers and supervisors who manage overtime hours for craft employees. Based on discussions with Labor Relations Field Operations, facilities with 10 or more craft employees are supposed to use OT Admin. Although the Postal Service has over 37,000 facilities, most of them are not required to use OT Admin based on the Postal Service's criteria of having 10 or more craft employees. According to Postal Service data, only 4,945 facilities have 10 or more craft employees. The sample size for this audit included 12 judgmentally selected locations based on overtime grievance costs and OT Admin usage, as described in Table 1. We based our conclusions on the audit sample and nationwide OT Admin usage data received from the Postal Service. We reviewed OT Admin usage data for Quarter 3, FY 2021, and found that 1,733 (35 percent) facilities with more than 10 craft employees nationwide did not use OT Admin as described in Finding 1.

Regarding management's disagreement with recommendation 1, we acknowledged that overtime administration may involve differences relating to union involvement and local memorandums of understanding that have unique variances. In fact, according to the Postal Service, OT Admin was designed to help users assign overtime more efficiently and consistent with appropriate collective bargaining agreements and local memoranda of understanding.

We also did not recommend a "blanket requirement" to use OT Admin or the identification of specific individual users. We recommended that the Postal Service assess who (which crafts at each facility) should use OT Admin and provide guidance and training to those users. Based on discussions with Labor Relations Field Operations, they believe facilities with 10 or more craft employees should use OT Admin. The Postal Service did not provide us any additional reason why 1,733 facilities with more than 10 craft employees should not use OT Admin. During our site visits to facilities with 10 or more craft employees, 72 percent of managers and supervisors stated they did not use OT Admin because it was not required and was only an internal best practice. Further, managers and supervisors at the facility level stated they were not always encouraged by their installation manager to use OT Admin. Managers and supervisors were generally unaware as to whether they should be using OT Admin because of conflicting instructions to use the system, since the Postal Service has no formal written requirement to use the system. Finally, we found instances where training for the OT Admin System was not appropriately maintained at the local level. As we noted in Finding 1, managers and supervisors were not trained, stated they needed additional training, and did not maintain or provide training records for us. We view the disagreement on this recommendation as unresolved and plan to pursue it through the formal audit resolution process.

Regarding management's disagreement with recommendation 2, management did not provide documentation to support the assertion that oversight of Overtime Desired Lists and overtime requirements from local memorandums of understanding are appropriately implemented and managed at the local level. Assuming they were properly trained to do so, managers and supervisors are responsible for editing, adding, and removing employees in OT Admin. As discussed previously, training appears to be an issue. Additionally, overtime requirements from local memorandums of understanding may require a system administrator to update in OT Admin instead of the local manager or supervisor. The Postal Service has no standard process in place to ensure managers and supervisors are maintaining accurate data in the system. We view the disagreement on this recommendation as unresolved and plan to pursue it through the formal audit resolution process.

Regarding management's disagreement with recommendation 3, we recommended the assessment of conducting enhancements to the present system to capture historical usage data and percentages by facility and ensure records are maintained to assess the overall effectiveness of the system. Management disagreed with conducting an assessment, but subsequently stated that they conducted an assessment. Although, the present system provides daily use reports for OT Admin, the Postal Service does not maintain OT Admin historical data beyond 90 days to compare usage to grievance cost. During our review, we found two facilities that used OT Admin and incurred low grievance costs. Managers and supervisors at these facilities stated that OT Admin usage contributed to low grievance activity because it helped assign overtime in accordance with union contracts.

Without historical data, the Postal Service is unable to measure the cost benefit of OT Admin or validate whether the system continues to meet its intended goal of assigning overtime more efficiently while aiding in reduction of overtime grievances. Maintaining historical data would allow the Postal Service to compare and trend OT Admin usage and filed grievances nationwide. This comparison would aid in managing overtime and grievances at the facility level as described in Finding 1. We view the disagreement on this recommendation as unresolved and plan to pursue it through the formal audit resolution process.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

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Appendix A: Additional Information

Scope and Methodology

We reviewed overtime work hours, and grievance payments during FYs 2019 through 2021. Our review included the nationwide use of OT Admin by managers and supervisors who manage overtime hours for craft employees. The scope of our audit included 12 judgmentally selected locations based on overtime grievance costs and OT Admin usage, as described in Table 1.

Table 1. Selected Locations

Area		District/Division	Facility			
	High Cost and Not Using Application					
1	Eastern Processing	Chesapeake Processing	Philadelphia Network Distribution Center			
2	Western Processing	Midwest Processing	Omaha Nebraska P&DC			
3	Westpac Retail & Delivery	AZ-NM District	Phoenix – Arcadia Station			
4	Southern Retail & Delivery	Texas 2 District	Houston-Park Place			
5	Westpac Retail Logistics	Western Logistics	Logistics - Phoenix Arizona P&DC			
	tion					
6	Eastern Processing	Southeast Processing	Macon Georgia P&DC			
7	Atlantic Retail & Delivery	DE-PA2 District	Norristown-Tri-County Branch			
8	Westpac Retail & Delivery	California 3 District	Burbank Post Office			
High Cost and Using Application						
9	9 Westpac Retail & NV-UT District Delivery		Reno Post Office			

Area		District/Division	Facility	
10	Eastern Processing	Southwest Processing	North Houston Texas P&DC	
	Low	Cost and Not Using Applic	ation	
11 Atlantic Retail & Delivery		Michigan 1 District	Det – Strathmoor	
12	Western Processing	Western Processing	Reno Nevada P&DC	
Source: OIG analysis.				

To accomplish our review, we:

- Obtained and reviewed collective bargaining agreements and Postal Service policies and procedures relating to the management of overtime.
- Analyzed grievance data to identify trends, risk areas, and anomalies.
- Obtained and compiled nationwide OT Admin usage data.
- Reviewed OT Admin training records to determine if managers and supervisors attended OT Admin training.
- Interviewed managers and supervisors to determine their responsibilities regarding OT Admin.
- Interviewed union representatives to determine their responsibilities related to processing overtime grievances and OT Admin.
- Administered a nationwide survey for managers and supervisors to determine whether they use OT Admin.

We conducted this performance audit from October 2021 through April 2022 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective. We discussed our observations and conclusions with management on April 1, 2022, and included their comments where appropriate.

We assessed the reliability of the grievance data in GATS and OT Admin usage data by tracing them to source and supporting documentation and discussing and

verifying the data with management officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

While the OIG has conducted a series of overtime audits in the past, there have been no audits conducted specifically on OT Admin. Below are the series of overtime audits conducted:

Report Title	Objective	Report Number	Final Report Date	Monetary Impact (in millions)
Assessment of Overtime Activity	Assess Postal Service controls over managing overtime.	20-209-R20	8/25/2020	\$521.6
Mail Processing Overtime	Assess the Postal Service management of mail processing overtime during FY 2018.	NO-AR-19-005	6/13/2019	\$358.3
Postal Vehicle Driver Overtime- Houston District	Assess the effectiveness of Postal Service use of overtime for Postal Vehicle Service drivers in Houston.	NL-AR-19-001	12/11/2018	\$3.3
Management of Overtime in the Northeast	Assess the management of overtime in the northeast.	HR-AR-17-014	9/14/2017	\$308.4

Appendix B: Management's Comments



-2-

The Vice President, Labor Relations, will issue a memorandum to managers and local leadership regarding the importance of utilizing the OT Admin Tool, the effectiveness of utilization, and the identification of training needs.

Target Implementation Date: October 31, 2022

Responsible Officials:

Sr. Director, Field Labor Relations Ops Director, Field Labor Relations Support

Recommendation #2:

We recommend the Vice President, Labor Relations, develop a process to ensure the Overtime Administration System contains accurate overtime data, to include timely updates of the Overtime Desired Lists and overtime requirements from local Memorandums of Understanding.

Management Response/Action Plan:

Management disagrees with this recommendation.

The entries within the OT Admin System, oversight of Overtime Desired Lists and overtime requirements from local memorandums of understanding are appropriately implemented and managed at the local level.

The Vice President, Labor Relations will issue a memo reiterating the importance of managing use of the OT Admin System and to maintain Overtime Desired Lists and overtime requirements from local memorandums.

Target Implementation Date: October 31, 2022

Responsible Official:

Sr. Director, Field Labor Relations Operations Director, Field Labor Relations Support

Recommendation #3:

We recommend the Vice President, Labor Relations, assess the feasibility of conducting system enhancements to capture Overtime Administration System historical utilization records and percentages by facility and ensure records are maintained to assess the overall effectiveness of the system.

Management Response/Action Plan:

Management disagrees with this recommendation.

An assessment of the OT Admin System was made to determine feasibility of maintaining historical data beyond a 90-day historical report. The present system does not have the storage space needed to maintain data beyond 90 days. The present system for daily utilization reporting provides management with a current and up-to-date illustration of their entries and their performance with the OT Admin System.

- 3 -Responsible Official: Sr. Director, Field Labor Relations Operations. Director, Field Labor Relations Support Thomas J. Blum Vice President, Labor Relations (A) cc: CARM Dr. Joshua Colin Isaac S. Cronkhite Simon M. Storey



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