How Should BOCES O cials Approve and Monitor Overtime?

BOCES O cials Did Not Appropriately Approve Overtime

BOCES O cials Did Not Adequately Monitor Overtime

What Do We Recommend?

Appendix A – Response From BOCES O f cials

How Should BOCES O f cials Approve and Monitor Overtime?

Officials should develop and implement adequate controls to properly approve

For timekeeping purposes, employees either sign in and out on a manual log indicating the time they arrived and the time they departed or use their identification badges to electronically swipe in and out of their respective

Appendix A: Response From BOCES O cials

[redacted]

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Note 1
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that BOCES did not have any process for the preapproval of overtime. However, during the entire audit period, BOCES had in place, and diligently adhered to, a system for the *oral*

Note 2
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Note 3
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Note 4
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overtime unless it was first orally approved by the appropriate supervisor. BOCES respectfully requests that this be made very clear in the final audit report.[1]

Third, in light of the manner in which the Pandemic negatively affected staffing, often, overtime was, by necessity, pre-scheduled and pre-authorized for a specific, reoccurring purpose "until further notice." For example, one clerical employee was asked to work overtime to assist

Appendix B: OSC Comments on BOCES' Response

Note 1

We updated the Key Findings to note the time overlap with the pandemic and officials' assertion that overtime was verbally preapproved.

Note 2

While our report states officials said all overtime was preapproved verbally, verbal approvals do not provide management or those charged with ensuring compliance with BOCES policies with any evidence that overtime was preapproved. As a result, the lack of documentation prevents officials from ensuring that overtime controls are effective, and policies are adhered to. We edited the Key Findings to clarify that we were referring to written preapproval. A written preapproval process would have provided support to show the overtime was preapproved, necessary and could not be avoided.

Note 3

Officials did not provide any documentation to support overtime was "pre-scheduled and pre-authorized for a specific, reoccurring purpose …" The lack of documentation prevents officials from ensuring that overtime controls are effective, policies are adhered to and overtime was necessary.

Note 4

We reviewed both electronic swipe records and manual logs during fieldwork. We did not take exception if we were provided with either one to support the hours paid. When we did not have time records to support overtime paid, we provided names and dates to officials and made requests for additional documentation. We were not provided with the information either during fieldwork, at the end of fieldwork meeting, or at the exit conference. In addition, officials should have investigated instances where time records were inconsistent to ensure overtime was only paid for hours that were approved and worked.

Appendix C: Audit Methodology and Standards

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptrollerîs authority as set forth in Article 3 of the New York State General Municipal Law. We obtained an understanding of internal controls that we deemed significant within the context of the audit objective and assessed those controls. Information related to the scope of our work on internal controls, as well as the work performed in our audit procedures to achieve the audit objective and obtain valid audit evidence, included the following:

- We interviewed BOCES officials to obtain an understanding of the policies and procedures for the approval of overtime.
- We reviewed BOCESî CBAs and Board resolutions documenting employment stipulations to determine whether overtime payments were made in accordance with the agreements.
- We reviewed the total overtime payments made to all clerical employees during our audit period to determine which employees had the highest overtime charges. We used our professional judgment to determine our sample size of the 15 highest paid clerical employees of the 74 clerical employees receiving overtime payments. In addition, we reviewed the overtime payments made to the treasurer and the claims auditor.
- We reviewed the time records for these 17 employees for a six-month period (April, May and June of 2022, and January, February and March of 2023) to determine whether the overtime was authorized, preapproved, the reason for overtime was documented, the overtime worked was for routine work, and whether manual and electronic timekeeping logs supported overtime time

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). 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 findings and conclusions based on our audit objective.

Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

The Board has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and provided to our office within 90 days, pursuant to Section 35 of General Municipal Law, Section 2116-a (3)(c) of New York State Education Law and Section 170.12 of the Regulations of the Commissioner of Education. To

the extent practicable, implementation of the CAP must begin by the end of the next fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report,* which you received with the draft audit report. We encourage the Board to make the CAP available for public review.

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