



Office of the Inspector General Commonwealth of Massachusetts

Timekeeping Best Practices for Employers with Employees with Multiple Positions, November 2009

OIG Advisory

The Office of the Inspector General periodically receives complaints about possible fraud, waste, or abuse by municipal employees that have multiple positions within a jurisdiction or across jurisdictions. For example, an individual may be a part-time building inspector in two towns or an individual may be a full time police officer and may also teach at a local community college. Implementing appropriate plans and procedures for overseeing and accounting for the time of such employees is an important safeguard in preventing problems.

Most complaints revolve around an employee allegedly accounting improperly for his or her time or that both public employers are not getting their fair share of the employee's time. A clear and simple timekeeping policy will provide municipal managers with the tools necessary to ensure accountability and will assure the general public that its tax dollars are being accounted for properly. Unfortunately, some jurisdictions do not have the necessary internal controls and recordkeeping practices in place to readily determine if an employee is committing a time fraud on the taxpayers by abusing the rules and "being in two places at once."

Proper time accounting and reporting is a sound business practice. With the introduction of the economic stimulus program, the American Recovery and Reinvestment Act (ARRA), accurate timekeeping is a federal reporting requirement if you receive ARRA funds. This reporting is aimed at meeting the accountability and transparency objectives of ARRA and to accurately report the numbers of jobs retained or created by ARRA.

Based on this Office's experience, this Office recommends that a jurisdiction take the following preventive measures against time fraud generally and for ARRA funded programs:

1. Require that timesheets or the system of time reporting reflect actual time worked and include a signed employee attestation or accuracy certification statement.
2. Timesheets should be co-signed by the employee's supervisor or by another management level employee.
3. Management should periodically review performance and time records to ensure that both accurately and fully reflect performance and scheduling expectations.
4. Timekeeping policies and procedures should address multi-jurisdictional and multi-departmental situations. The rules should explain how time should be tracked and provide clear direction as to whether employee time can be flexible to accommodate other employment requirements, and if so, what approvals are necessary. For example, suppose an employee works for both Town A

and Town B. The employee works for Town A from 9:00 a.m. until 5:00 p.m. Mondays through Thursdays and works for Town B on Fridays. The employee needs to attend a meeting in Town B on a Tuesday between 10:00 a.m. and 12:00 p.m. Can the employee do this without taking leave time from Town A? If so, what are the rules?

If your jurisdiction does not already use these measures, then this Office recommends that you consider implementing them as soon as practicable.

If you wish to report suspected time theft or abuse, please contact the Office of the Inspector General's confidential 24 hour Fraud Hotline at **1-800-322-1323**.