



Office of Inspector General

Follow-up Review from the  
2020 Review of Credit  
Hours and Premium Pay

**FOLLOW-UP REVIEW FROM  
THE 2020 REVIEW OF CREDIT  
HOURS AND PREMIUM PAY**

**Report No. MAR-21-03**

**March 2021**

Federal Labor Relations Authority  
1400 K Street, N.W. Suite 250, Washington, D.C. 20424

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### **Acronyms**

AWS	Alternative Work Schedule
CAP	Corrective Action Plan
DMS	Document Management System
EOPF	Electronic Official Personnel Folder
FLRA	Federal Labor Relations Authority
FY	Fiscal Year
HRD	Human Resources Division
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OPM	Office of Personnel Management
SF-182	Standard Form 182, Authorization, Agreement, and Certification of Training
SOC	Summary of Comments to [the] Revised Alternative Work Schedules Policy
webTA	A Web-based Time and Attendance System
WSSF	Work Schedule Selection Form

Ernest DuBester, Chairman

This report presents the results of our follow-up review of the Federal Labor Relations Authority's (FLRA) implementation of the 17 agreed actions from the 2020 credit hours and premium pay review (MAR-20-03). We found that 14 of the 17 agreed actions had been implemented and closed at the date of issuance of this report. Our office will perform a second follow-up review of the three open actions in Fiscal Year (FY) 2022.

## **Objective**

The objective of the follow-up review was to determine the extent to which the actions agreed in the 2020 review of credit hours and premium pay had been implemented by the Human Resources Division (HRD) and whether the associated recommendations should be closed. The review was carried out from May 21, 2020 to February 19, 2021. In light of the COVID-19 provisions all work was performed remotely and through conference calls.

## **Results in Brief**

The Office of Inspector General (OIG) conducted its first follow-up review of our "Management Advisory Review of Credit Hours and Premium Pay" (MAR-20-03), issued in March 2020. In our prior review of FLRA's credit hour and premium pay program, we found that some of the policy requirements did not comply with applicable legislation and/or the Office of Personnel Management's (OPM's) guidance, that some of the policy requirements were not being followed, or that some of the policy requirements might need to be reviewed and/or reconsidered. In addition, control weaknesses were found in supervisory reviews of employees' work time and retention and availability of certain employee records within the HRD. To address these issues, we made 17 recommendations. Thirteen of these recommendations addressed policy issues, one recommendation addressed supervisory certifications of employees' work time, and the remaining 3 recommendations pertained to HRD documentation and establishing appropriate work schedule categories within FLRA's Web-based Time and Attendance System (webTA). Based on our work for this follow up report, we closed 14 recommendations, while 3 recommendations remain open. We will perform a second follow-up review of the three remaining open recommendations in FY 2022.

## **Background**

In 1978 Congress passed legislation permitting agency experimentation with workplace (work time) flexibilities. This was followed by additional legislation in 1982 that allowed agencies to implement these flexibilities. A key piece of the 1982 flexibilities legislation was the ability to earn "credit hours," a type of overtime hours that could be accumulated to shorten the workweek or another workday. This legislation was

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eventually followed in 1994 and 1996 by President Clinton's issuance of memoranda to agencies that required each agency head to develop and later implement an action plan for a flexible work schedule program. The FLRA Alternative Work Schedule (AWS) Policy, which contains a flexible work schedule, among other work schedules, became effective in 2011.

### **Prior Year Report**

On March 11, 2020, OIG issued a report (MAR-20-03) to the FLRA Chairman on the results of our "Management Advisory Review of Credit Hours and Premium Pay." The objective of the review was to determine if the FLRA's policies, controls, and processes for the earning of credit hours and premium pay were being properly administered and conformed to Government requirements.

Our prior review of this policy and its program found that during the 20-month review period, that ended in May of 2019, that the program was well used by 69 of 137 FLRA employees, who earned almost 3,300 credit hours.

We also found that the policy did not fully comply with all Federal requirements, and that not all of the policy's requirements were being followed. In addition, we found some related issues to the review pertaining to time and attendance oversight, and the retention and availability of records. In our prior report, the OIG made 17 recommendations to strengthen FLRA's credit hours and premium pay program. Thirteen recommendations were made related to the AWS policy and 4 recommendations concerned the other items.

### **Results of Review**

Below is a restatement of the 17 recommendations taken from the "Management Advisory Review of Credit Hours and Premium Pay, MAR-20-03." Under each recommendation is a discussion of management's corrective action or action still uncompleted (needed), and whether it was acceptable or was not acceptable to resolve and close the recommendation.

**Recommendation 1. We recommend that the Director of the Human Resources Division, review the flexible time bands and determine if they should be expanded, and also determine what additional measures, if any, should be adopted to ensure that employees are only receiving credit for time worked within the established work day.**

On January 19, 2020, management issued a revised AWS policy and a document titled, Summary of Comments to [the] Revised Alternative Work Schedules Policy (SOC). The SOC was a summary of comments management had received from FLRA personnel and it also provided management's final comments and position about proposed AWS policy changes.

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Concerning the expansion of time bands, although no time bands were changed in the AWS policy, the SOC had comments and approved a related policy correction under the “Flexible Time Bands” header. We also noted an earlier management draft version of the AWS policy had comments about time bands, including expanding them. Other confirmations of management’s review of time bands included, associated changes of FLRA’s work hours and management oral confirmation that it had reviewed time bands but that it had decided against making any changes. Based upon the foregoing information, we believe it evident that flexible time bands were reviewed and a determination was made not to expand them.

Regarding what additional measures might be taken, if any, to ensure that employees receive credit for time worked only within the established workday, a change was made in the AWS Policy addressing this issue. The policy states, with respect to monitoring employee computation of rounding up and down of daily time, “supervisors are charged with monitoring...and rectifying abuses.” Since supervisors are charged with monitoring starting and ending work times, this will help to ensure that employees are not charging time for work outside of the established workday.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 2.** We recommend that the Director of the Human Resources Division, better communicate and enforce the requirement that credit hours not be earned on any days that training occurs.

HRD informed us that they held a meeting of administrative officers responsible for timekeeping in webTA and conveyed to them that part of their role was to address any issues they saw in employee time reports. In particular, with regard to this recommendation, HRD said they discussed policing the issue of someone earning credit hours who had also received training on the same day.<sup>1</sup> In addition, the AWS policy has been updated to prohibit the earning of credit hours on days when training is received. This prohibition was also communicated in the SOC to all FLRA staff.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

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<sup>1</sup> A file in a portable document format of a “power point” presentation was provided to the OIG showing general discussion topics which included, “Manage Employee Premium Pay Requests.” The presentation did not specifically include a topic focused on addressing credit hour earnings on the same day that training is received.

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**Recommendation 3. We recommend that the Director of the Human Resources Division, determine and evaluate the need to have a written time log and the need to capture a per minute accounting of an employee’s arrival and departure time.**

The sign-in and sign-out records requirement for employees to record their time has been replaced in favor of the webTA timekeeping system which records time to the nearest quarter hour. Also, see the related discussion under Recommendation 4 below.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 4. We recommend that the Director of the Human Resources Division, reevaluate and revise accordingly, the “Round Down Daily” Rule for credit hours, taking into consideration, the lack of compliance, the rule’s fairness, the difficulty in administering different recording requirements for the various types of overtime pay, and best practices as provided for in other federal overtime pay laws and regulations.**

The “Round Down Daily” Rule, where employees’ work time was required to be reduced downward to the last full quarter hour for working any amount less than a full quarter hour (for example, losing 14 minutes of work time when not working a full 15-minute quarter hour) has been replaced by rounding up or down employee work time to the nearest quarter hour.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 5. We recommend that the Director of the Human Resources Division, review and adjust the policy limitations on SES employee participation as deemed appropriate.**

Management reviewed the limitation on SES participation in the AWS program and decided against it.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

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**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 6.** We recommend that the Director of the Human Resources Division, modify the AWS policy language to correct the title, Variable Day Schedule to state that it is a Variable Week Schedule, and also modify the discussion of travel status and work day requirements to include the availability of Compensatory Time for Travel.

The use of the term, “Variable Day” was eliminated from the document and a description of FLRA’s “Variable Week Schedule” has been provided. In addition, there is a discussion of work day requirements when traveling (unmodified from the original AWS policy), that credit hours generally cannot be earned while an employee is in a travel status, and that Compensatory Time Off for Travel is available but that OPM’s regulations must be followed. These policy changes and requirements adequately implements the recommendation.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 7.** We recommend that the Director of the Human Resources Division, define the term, “necessary work” in the AWS policy and require that such work be documented in webTA or elsewhere, as appropriate, prior to supervisory approval of credit hours.

Management elected to not define the term, “necessary work,” and instead removed the term from the policy. The second part of the recommendation was that for credit hours earned in the performance of “necessary work,” be documented (perhaps in webTA). Management determined that it was not practicable. The SOC states that, “webTA is not capable of accepting comments daily,” and that “the supervisor is responsible for ensuring the use of credit hours is not abused.” The elimination of the term, “necessary work,” and management’s determination not to require documentation for credit hour work in webTA but to rely on the supervisor for oversight of credit hours is an adequate alternative implementation of the recommendation.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

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**Recommendation 8. We recommend that the Director of the Human Resources Division, reevaluate and determine if FLRA should continue to permit supervisors discretionary authority to disallow the earning of credit hours without appropriate criteria for that decision, or develop appropriate criteria for that decision.**

The AWS policy allows a supervisor discretionary authority for determining whether an employee should be allowed to earn credit hours subject to “workload requirements.” In our initial report, we were concerned that the workload requirement criterion did not significantly differ from the requirement for all those earning credit hours, that credit hours could only be earned for “assigned and necessary work.” Since there did not seem to be a significant difference between these criteria, a supervisor’s use of discretionary authority to stop or limit an employee from earning credit hours could have allowed for allegations of, or actual program abuses, such as those that are Federal prohibited personnel practices. However, management dropped the phrase, “assigned and necessary work” from its revised AWS policy, which made the “workload requirement” criterion more meaningful in the context of the AWS. Accordingly, we accept management’s alternative implementation for this recommendation.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 9. We recommend that the Director of the Human Resources Division, correct the AWS policy, to allow those employees working under a Variable Week Schedule to utilize partial sick or annual leave time in appropriate increments, and remove the requirement for a minimum sick leave charge of 5 hours, and/or clarify the language that it is the minimum charge for credit hours or leave to cover any scheduled core hours not worked.**

The original policy language requiring a minimum leave charge of 5 hours for any employee absence for those working a variable day schedule was revised to state: “[for] an employee working under the variable week work schedule recording no work hours for a scheduled workday, the minimum charge of sick or annual leave is 5 hours.” The policy then refers the reader to another policy section that defines the variable week schedule. This section states that there are 80 hours in a biweekly pay period that must be accounted for by work, leave or credit hours. This leaves it up to the employee to determine the appropriate increment of leave or other time to be charged. This revision corrects the language in the AWS policy as recommended.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

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**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 10.** We recommend that the Director of the Human Resources Division, revise the AWS policy rules for compressed schedules so that the normal “in lieu of” holiday for all days on which a holiday falls, including Mondays, is the preceding day.

The “in lieu of” holiday has been changed to the preceding workday for employees on both a flexible and a compressed work schedule.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 11.** We recommend that the Director of the Human Resources Division, revise the AWS policy to ensure that employees on a flexible 80-hour biweekly work schedule are permitted holiday leave for 8 hours, regardless of the number of hours scheduled for work on a day designated as a holiday.

For employees working an 80-hour biweekly work schedule, the policy has changed to allow an 8 hour “in lieu of” holiday even if the employees were not scheduled to work on that holiday.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 12.** We recommend that the Director of the Human Resources Division, create a policy requirement that ensures credit hours are not earned on days when annual leave, sick leave, compensatory time, credit hours, or similar are used.

The recommendation was implemented and states that employees cannot earn credit hours when taking leave or time off.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

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**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 13.** We recommend that the Director of the Human Resources Division, remove all references to FLRA’s collective bargaining agreement and to the UAE.

We found no further references to FLRA’s collective bargaining agreement or the UAE.

**Status:** The recommendation has been closed.

**Management’s Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management’s efforts in resolving this recommendation. See the full text of management’s response in Appendix 3.

**Recommendation 14.** We recommend that the Director of the Human Resources Division, maintain and retain files of training request forms as prescribed by [National Archives and Records Administration (NARA)] NARA, and minimally retain the last 2 Work Schedule Selection Forms for each employee.

The first part of this recommendation is for HRD to maintain and retain a file of training request forms in accordance with NARA’s retention standards. In implementing this recommendation, HRD created and now maintains an informational spreadsheet documenting 119 FLRA training requests, Standard Form-182s (SF-182s),<sup>2</sup> that were approved by HRD in 2020. They have also started a new spreadsheet for FLRA’s 2021 training requests. In addition, HRD now retains digital copies of SF-182s in a cloud-based document management system (DMS).<sup>3</sup> An HRD internal procedure states that they will retain the SF-182s for 3 to 5 years. This part of the recommendation pertaining to filing and retaining training requests has been implemented.

The second part of this recommendation calls for HRD to maintain and retain at least the last 2 of each employee’s Work Schedule Selection Forms (WSSFs). Management concurred with the recommendation and issued a corrective action plan (CAP) calling for a written procedure to address this issue and to annually obtain WSSFs. In fulfilling the recommendation, management would also need to obtain and retain all interim WSSFs until a 3<sup>rd</sup> WSSF was received for each employee. Per HRD’s Director, WSSFs were not collected for 7 recent movements of personnel. In addition, we noted only 23 WSSFs

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<sup>2</sup> These training requests are made via the Office of Personnel Management’s SF-182, Authorization, Agreement, and Certification of Training

<sup>3</sup> For 2020, the DMS had 122 SF-182 items. However, this does not match the 119 SF-182 items recorded in HRD’s informational spreadsheet. The 3-item discrepancy between the DMS and HRD’s spreadsheet has not been reconciled by HRD but should be reconciled when time permits. There was also a discrepancy for 2021 but since most of the training requests were recent, we considered this to be “in process.”

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were retained in the DMS system for 2019, despite HRD's request in August of that year for all staff, approximately 80 personnel,<sup>4</sup> to provide new WSSFs. This part of the recommendation, retention of WSSFs has not been implemented.

**Status:** The recommendation remains open.

**Management's Response:** Management stated they believe the processes are outlined for the remaining recommendations, that COVID-19 and the use of external components for externally managed solutions delayed the implementation of the three remaining recommendations, and that they will continue to actively work to fully implement the recommendations.

**OIG Comment:** We believe management's corrective action plan, together with the OIG's feedback on the plan, and other exchanges of information between management and the OIG provide an outline and the information needed to fully implement the remaining recommendations. See the full text of management's response in Appendix 3.

**Recommendation 15.** We recommend that the Director of the Human Resources Division, prioritize HRD work appropriately, to ensure performance appraisals are scanned into the [Electronic Official Personnel Folder (EOPF)] EOPF system within 90 days following the appraisal due date and establish a process to verify that all performance appraisals have been entered into the system.

The recommendation calls for all performance appraisals to be promptly and accurately scanned into the EOPF system. We found that for 2020, HRD was using a spreadsheet that recorded which employees were required to have a performance appraisal and then used the spreadsheet to track performance appraisal additions into the DMS<sup>5</sup> and into the EOPF system. Based on our review of this HRD spreadsheet, counts of items in the DMS<sup>6</sup> performance appraisal folders and some spot inspection of appraisals drawn from the DMS and EOPF system, we believe this recommendation has been implemented.

**Status:** The recommendation has been closed.

**Management's Response:** Management noted the recommendation has been closed.

**OIG Comment:** We appreciate management's efforts in resolving this recommendation. See the full text of management's response in Appendix 3.

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<sup>4</sup> This 80 personnel number is based upon HRD's tracking of employees that should have received a performance appraisal in 2019 and it assumes the same number of personnel should have submitted WSSFs in 2019.

<sup>5</sup> HRD reported reconciling the appraisal tracking spreadsheet to the DMS system but that it still has a 1 item discrepancy which should be resolved.

<sup>6</sup> We were unable to perform a total appraisal count from the EOPF system because it is structured by individual employee, which does not allow for universal counts.

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**Recommendation 16. We recommend that the Director of the Human Resources Division, establish an appropriate and unique category of Work Schedule, e.g., fixed tour, gliding variable week, etc..., in webTA to correspond with the work schedule selected by each employee.**

At the time of our first review of credit hours and premium pay, we found that FLRA policies provided for 2 flexible work schedule options, a gliding or a variable day<sup>7</sup> schedule. However, FLRA categorized both flexible work schedules as Maxiflex in webTA. This lack of specificity in webTA makes it more difficult to determine whether the correct schedule was setup, whether the default schedule for later data entry is correct, whether the schedule is being followed or if a different schedule is needed. Our recommendation ...was issued to address these problems. Management has contacted FLRA's payroll processor, but they have not been able to resolve the differences between FLRA's and webTA's flexible work schedule categories. However, the OIG recently noted a potential resolution for the problem, but HRD needs additional time to verify that the change can be made and to implement the change if it is found to be a workable solution.

**Status:** The recommendation remains open.

**Management's Response:** Management stated they believe the processes are outlined for the remaining recommendations, that COVID-19 and the use of external components for externally managed solutions delayed the implementation of the three remaining recommendations, and that they will continue to actively work to fully implement the recommendations.

**OIG Comment:** We believe management's corrective action plan, together with the OIG's feedback on the plan, and other exchanges of information between management and the OIG provide an outline and the information needed to fully implement the remaining recommendations. See the full text of management's response in Appendix 3.

**Recommendation 17. We recommend that the Director of the Human Resources Division, in consultation with the FLRA's Executive Director, develop and maintain a list of supervisors showing assigned subordinates for which the supervisor has direct knowledge of each employee's biweekly work time and work projects, with this information being used to direct the assignment of supervisors for the certification of employee timesheets in webTA; and with this list, and a list of webTA certifications being retained for a minimum of 2 years.**

There are 3 related parts to this recommendation which are the following: (1) develop and retain a list of supervisors and their subordinates, (2) require that the supervisors' listed in the previous item be the individuals certifying for their subordinate's time in webTA, and (3) that a list of those certifications be retained for 2 years. Management implemented items 1 and 3 of the recommendation by developing a list of supervisory assignments

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<sup>7</sup> The variable day schedule was actually a variable week schedule that was misnamed.

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showing their subordinate employees and by printing and retaining webTA supervisor certifications for each pay period. However, we noted that item 2 was not fully implemented in that some non-listed supervisors were certifying employee time for non-subordinates. These certification issues were apparently related to transition activities, e.g., movements of personnel because of the change in government administration. HRD's Director said, "HRD is in the process of moving and updating all of the necessary items for the transition," and that, "HRD continues to monitor the situation, process the requisite personnel actions and update webTA..." As this situation is in a state of change, we could not evaluate it further. In addition, there was no further documentation provided to support that HRD completed the implementation of item 2 of the recommendation.

**Status:** The recommendation remains open.

**Management's Response:** Management stated they believe the processes are outlined for the remaining recommendations, that COVID-19 and the use of external components for externally managed solutions delayed the implementation of the three remaining recommendations, and that they will continue to actively work to fully implement the recommendations.

**OIG Comment:** We believe management's corrective action plan, together with the OIG's feedback on the plan, and other exchanges of information between management and the OIG provide an outline and the information needed to fully implement the remaining recommendations. See the full text of management's response in Appendix 3.

## **Appendix 1: Scope and Methodology**

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The follow-up review on recommendation implementation for the “Management Advisory Review of Credit Hours and Premium Pay, Report No. MAR-20-03,” was conducted through FLRA Offices located in Washington DC during the period from May 21, 2020 through February 19, 2021, and encompassed activity during that period.<sup>8</sup>

The work started with a review of management’s proposed CAP, which restated each recommendation and management’s plan to implement it or an alternative implementation plan. As part of the OIGs review of the CAP, management was provided comments from the OIG concerning the planned implementation. Management’s changes to the plan as a result of the OIG’s comments were also reviewed and additional OIG comments provided.

A few months prior to the Entrance Conference, in November 2020, requests were made of HRD for preliminary review information. The preliminary information request included: the draft AWS policies, communication with employees about training and credit hours, copies of training and work selection folders, screen prints of employee appraisals, webTA schedule information, and a list of supervisors. Also, we mentioned that we needed to start the follow-up review soon to complete it by March 11, 2021.<sup>9</sup>

In its initial response to the information request, HRD provided a draft of the AWS policy that contained some of the changes recommended in the report (comments from staff had not yet been fully solicited).<sup>10</sup> Despite some emails back and forth concerning the other requested preliminary information, HRD was not able to provide any of the other information because of the year end. Aside from an AWS policy update and related materials, no additional information was received until the entrance conference of January 28, 2021. During and after the entrance conference, into mid-February, we received the information preliminarily requested. This information was ultimately used for the review.

On January 19, 2021, a final version of the AWS policy, along with staff and management comments was issued and sent to all staff. The OIG has reviewed the revised policies and compared them to the recommendations related to the AWS policy (recommendation 1 through 13). For recommendations 14 through 17, which were not directly related to the AWS policy, we met with HRD and discussed the implementation of each. Also, we electronically viewed or obtained supporting information or documentation (see preliminary information request) for each recommendation, where available. We reviewed the implementation to assess whether the recommendation should be closed. The implementation status of all recommendations is included in this report.

We documented all the review activity as described above. We then issued a discussion draft report for management’s comments and later a final draft report for management’s written responses. We modified and/or incorporated management’s comments and responses into our report as we deemed appropriate. The final report was issued.

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<sup>8</sup> The Entrance Conference discussing the objectives, scope and methodology, and to answer any questions for management was held January 28, 2021.

<sup>9</sup> This is the 1-year anniversary date since the prior report’s issuance.

<sup>10</sup> An additional AWS policy was circulated to the staff for comment in late December 2020 for which the OIG provided comments to HRD for its consideration.

## **Appendix 2: Report Distribution**

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### **Federal Labor Relations Authority**

Colleen Duffy Kiko, Member

James Abbott, Member

Michael Jeffries, Executive Director

Paula Chandler, Director, Human Resources Division



UNITED STATES OF AMERICA  
FEDERAL LABOR RELATIONS AUTHORITY

March 12, 2021

**MEMORANDUM**

TO: Dana Rooney  
Inspector General

FROM: Michael Jeffries   
Executive Director

SUBJECT: Management Response to the Follow-up Review from the 2020 Review of Credit Hours and Premium Pay

Thank you for the opportunity to review and provide comments on the Follow-up Review from the 2020 Review of Credit Hours and Premium Pay. Overall, the March 11, 2020, OIG Management Advisory Review of Credit Hours and Premium Pay (MAR-20-03) provided valuable information and the necessary recommendations to assist FLRA in maintaining a solid program to support and sustain the Agency's use of credit hours and premium pay. As indicated in the corrective action plan, the majority of the recommendations (14 out of the 17 recommendations) were addressed and closed by the review and update of FLRA Policy No. 3640.1, Alternative Work Schedules.

Though we do have three recommendations that remain open, we believe the processes are outlined for the remaining recommendations and will continue working to fully implement them. Unfortunately, COVID-19 did present some difficulties as well as the need for external components to assist with updating externally managed solutions. While these challenges have resulted in delays for completing the three remaining recommendations, HRD is actively working with the appropriate parties (internally and externally) to close out these last three recommendation as soon as possible.

We appreciate the Office of Inspector General's support and look forward to continuing to work with you on this matter.

# CONTACTING THE OFFICE OF INSPECTOR GENERAL

IF YOU BELIEVE AN ACTIVITY IS WASTEFUL,  
FRAUDULENT, OR ABUSIVE OF FEDERAL FUNDS,  
CONTACT THE:

**HOTLINE (800)331-3572**  
**[HTTP://WWW.FLRA.GOV/OIG-HOTLINE](http://www.flra.gov/oig-hotline)**

EMAIL: [OIGMAIL@FLRA.GOV](mailto:OIGMAIL@FLRA.GOV)  
CALL: (202)218-7970 FAX: (202)343-1072  
WRITE TO: 1400 K Street, N.W. Suite 250, Washington,  
D.C. 20424

The complainant may remain confidential; allow their name to be used; or anonymous. If the complainant chooses to remain anonymous, FLRA OIG cannot obtain additional information on the allegation, and also cannot inform the complainant as to what action FLRA OIG has taken on the complaint. Confidential status allows further communication between FLRA OIG and the complainant after the original complaint is received. The identity of complainants is protected under the provisions of the Whistleblower Protection Act of 1989 and the Inspector General Act of 1978. To learn more about the FLRA OIG, visit our Website at <http://www.flra.gov/oig>



Office of Inspector General

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