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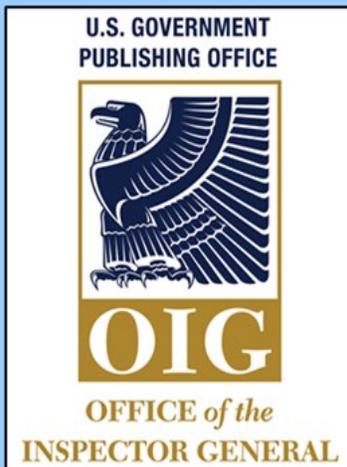
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MEMORANDUM
OIG-23-040

Date

March 20, 2023

To

Director, U.S Government Publishing Office

From

Acting Inspector General

Subject

Audit Report: Management and Use of Official Time, Report Number 22-08R

I am writing to inform you that the attached final audit report, originally issued on September 16, 2022, was reissued on March 20, 2023. The report was revised to remove statements pertaining to questioned costs for official time used for representational activities. We originally developed average hourly costs for official time hours in the background section of the report for presentational purposes only, not for questioned costs as defined in the IG Act. However, these changes did not alter the finding and six recommendations made in the final report.

If you have any questions or need additional information, please do not hesitate to contact Lori Lau Dillard, Assistant Inspector General for Audit, at llaillard@gpo.gov.

A handwritten signature in black ink, reading "Nathan J. Deahl", with a long horizontal flourish extending to the right.

NATHAN J. DEAHL
Acting Inspector General

Attachment

RESULTS IN BRIEF

What We Did

The OIG Audit Division reviewed the official time used for union activities (Project Number A-2022-001). Our objective was to assess the management and use of official time for union activities by GPO employees in bargaining units.

What We Found

Finding 1. Management of Official Time Lacked Adequate Controls. We found that the use of official time has improved relations between management and labor unions because official time facilitates working jointly to develop solutions or improvements to address workplace challenges. However, GPO lacked adequate controls, processes, and guidance to ensure that official time used was accurately recorded in the time and attendance system or had met activities authorized by the Federal Service Labor-Management Relations Statute¹ (Statute) or provisions in collective bargaining agreements (CBA). Based on our analysis of time and attendance data, documentation reviews, and interviews, some of the official time was under-reported or unsupported as required. This occurred because employees and supervisors followed practices that were not always consistent with CBA provisions; recording and/or reporting official time differed from one business unit to the next; there were challenges with using the “reasonable and necessary” time approach that has no specific number of hours to manage official time; and, monitoring the use of official time for compliance was not required. Absent adequate controls and processes, GPO cannot determine the overall costs of support for union activities, the amount of official time used, the number of people using official time, and whether official time was used as intended.

The legal obligation to grant official time reinforces the need for oversight and accountability for GPO’s 11 labor unions representing about 900 bargaining unit employees eligible to use official time. It is important that adequate controls, processes, and guidance are in place to provide reasonable assurance that official time:

- Is used as intended;
- is consistent with applicable Statute, CBA provisions, and GPO policies;
- is recorded in GPO’s official time and attendance system;
- informs management and labor decision-making; and
- provides public transparency.

¹ 5 United States Code §§ 7101-7135.

What We Recommended

Our report contains six recommendations designed to improve controls, processes, and guidance for requesting, approving, reporting, recording, and monitoring official time.

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INTRODUCTION

Objective

The Federal Service Labor-Management Relations Statute² (Statute), enacted in 1978 allows for the use of official time in the federal government. Official time, as authorized by the Statute, is paid time spent by U.S. Government Publishing Office (GPO or Agency) employees performing representational work for bargaining units. This report presents the results of our self-initiated audit of official time for union activities (Project Number A-2022-001). Our objective was to assess the management and use of official time for union activities by GPO employees in bargaining units. See Appendix A for additional information about this audit.

Background

The Statute provides a legal basis for GPO management and labor unions to establish two types of official time.

- 1) Official time for collective bargaining and Federal Labor Relations Authority (FLRA)-related activities is provided as a statutory right.³
- 2) Official time for other purposes must be negotiated between management and the union in an agreed-upon amount deemed reasonable, necessary, and in the public interest.⁴

Activities that relate to internal union business, such as the solicitation of members or the election of union officials, must be performed when in a non-duty status;⁵ that is, not on official time. Accordingly, GPO management and labor have a shared responsibility to ensure that official time is authorized and used appropriately.

There are 11 labor unions representing about 900 bargaining unit employees⁶ at GPO main and field offices. GPO policies governing official time for its 11 labor unions are a matter subject to provisions in four collective bargaining agreements (CBA), as shown in [Figure 1](#).

² 5 United States Code (U.S.C.) §§ 7101-7135.

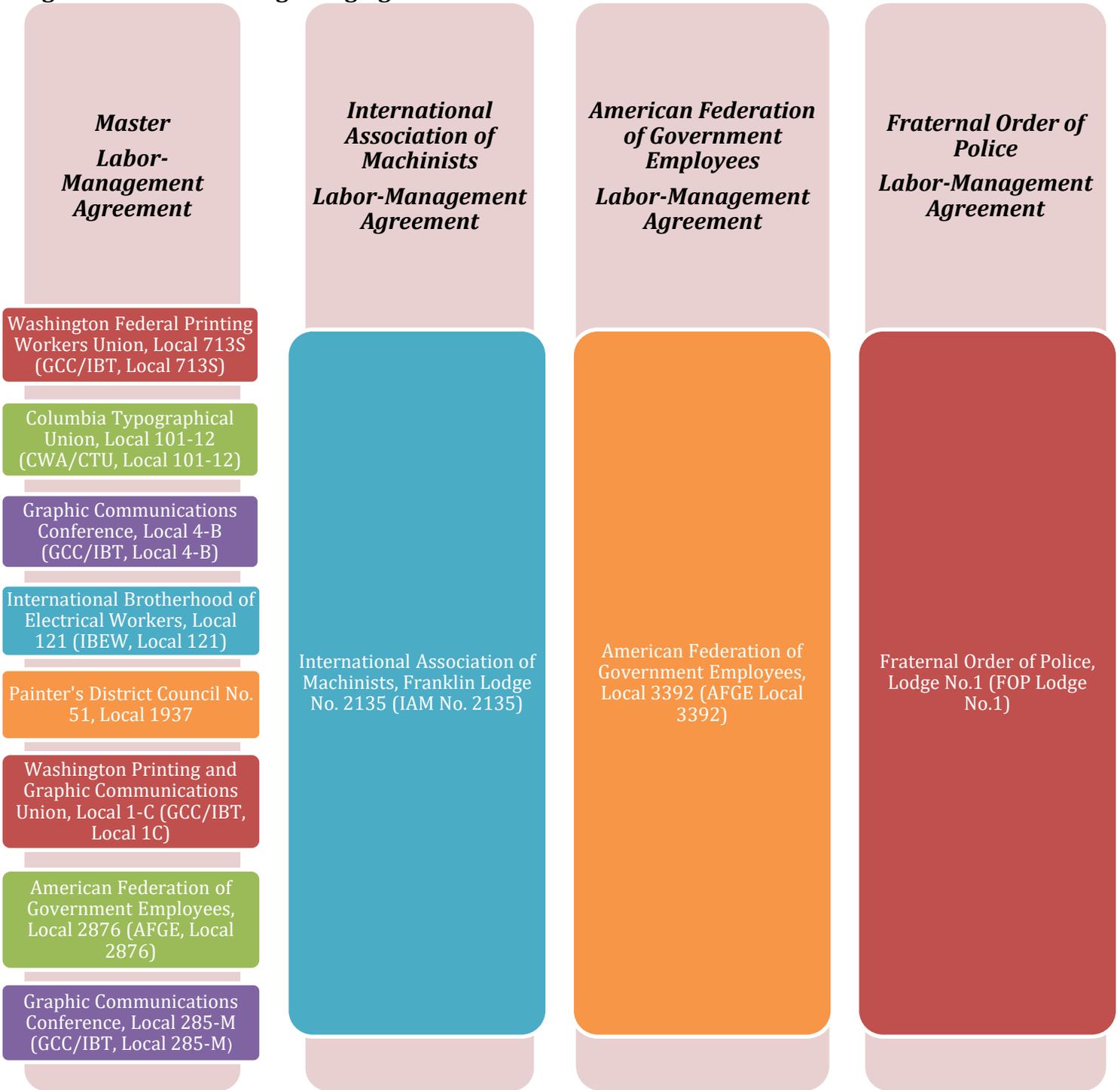
³ See 5 U.S.C. §§ 7131(a) and (c).

⁴ 5 U.S.C. §§ 7131(d).

⁵ 5 U.S.C. §§ 7131(b).

⁶ As of September 30, 2021, GPO reported 1,568 employees on board.

Figure 1. Collective Bargaining Agreement and Labor Union Lists



GPO entered into a single agreement (Master CBA) with eight labor unions in 1982 and updated the agreement in 1988. The eight labor unions elected a Joint Council of Union (JCU) chairperson to represent them collectively in wage negotiations and other duties involving the JCU. GPO entered into separate agreements with the International Association of Machinists (IAM CBA), American Federation of Government Employees (AFGE CBA), and Fraternal Order of Police (FPO CBA) in 1972, 2000, and 2009, respectively.

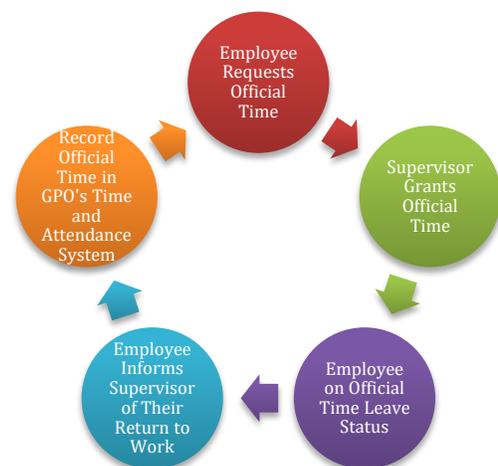
According to the four CBAs, official time cannot be used as a matter of routine and must be reasonable and necessary. Employees and union officials/representatives may use official time only for union activities authorized by the Statute or provisions in CBAs. Although the specifics of the four CBAs varied, the categories, and activities that employees and union officials/representatives are authorized to use official time are as follows:

- Participating in discussions regarding personnel policies or practices or conditions of employment; on national- and local-level negotiations, and preparing for the negotiations.
- Attending meetings called by management concerning CBAs; joint labor-management committee meetings addressing specific issues such as safety and health; and union-sponsored training and other training sessions pertaining to labor relations.
- Filing grievances or serving as a witness in grievance procedures.
- Meeting with union representatives regarding grievances, appeals, or personnel matters.

In addition, employees and union officials/representatives may record official time to union-leave without pay (LWOP) for union business not covered above, such as attending union conferences.

As shown in [Figure 2](#), employees and union officials/representatives must receive the permission of their supervisors prior to taking official time and union-LWOP. If workload permits, supervisors will grant employees and union officials/representatives a reasonable and necessary amount of official time. If the supervisor denies a request due to work requirements, the supervisor will explain the reason and indicate when they expect to grant the request. When necessary and after arranging with their supervisor, official time is permissible on hours other than the employee's scheduled work shift. Upon completion, employees and union officials/representatives must inform their supervisors of their return to duty, and the amount and function of official time used.

Figure 2. Official Time Life Cycle

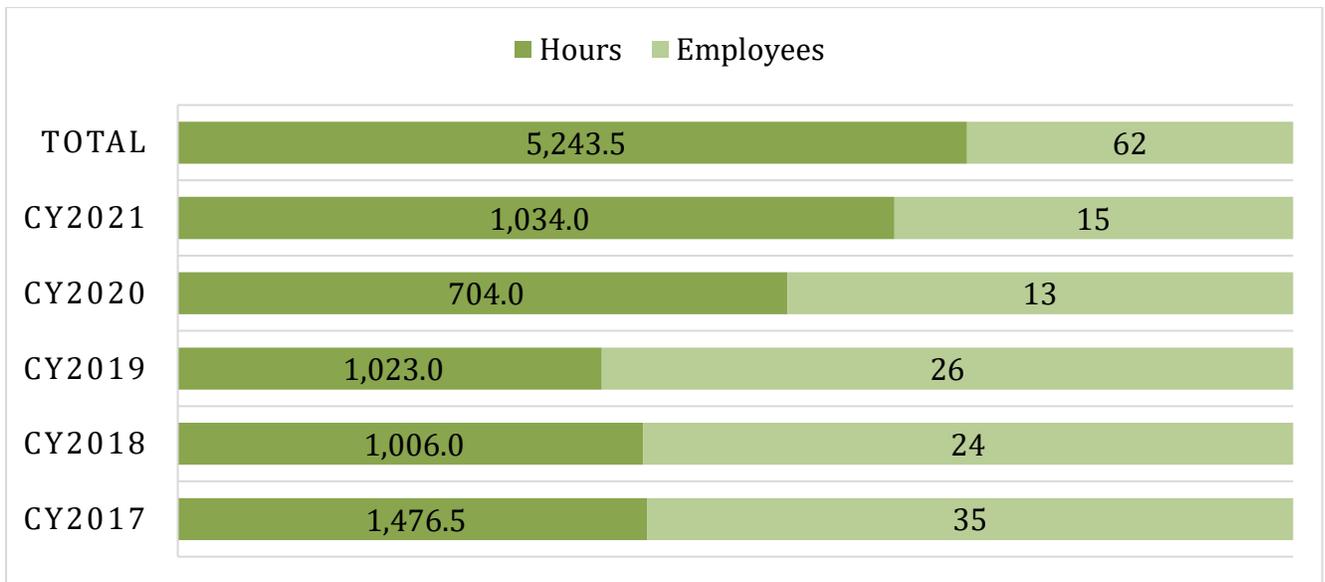


Finally, employees, supervisors, and those designated as timekeepers are required to access GPO’s official time and attendance system (webTA)⁷ each pay period and enter, validate, and certify official time hours, as appropriate, using the following leave codes:

- 35 - Negotiations/Reopen
- 36 - Midterm Negotiations
- 37 - Labor-Management
- 38 - Grievances/Appeals/Equal Employment Opportunity Complaints
- 71 - Leave Without Pay/Union Business.

GPO reported that 62 employees used 5,243.5 hours at a cost of about \$214,983,⁸ of official time from calendar years (CY) 2017 through 2021, as shown in [Figure 3](#). We selected CY 2021 for our analysis because it was the most recent, complete calendar year of official time data available for 39 union officers/representatives currently designated by GPO’s 11 labor unions.

Figure 3: Official Time Recorded in webTA



Source: GPO webTA

⁷ GPO Directive 440.12A, §6. Since 2009, webTA is the official record of time and attendance, including leave balances, for all employees of the GPO. Employees can access webTA at any time via the Internet. Employees, supervisors, and those designated as timekeepers and administrators access the system in order to accomplish time and attendance reporting each pay period.

⁸ We used a conservative estimate of \$41 per hour, an average hourly rate for a journey level employee from CYs 2017 through 2018 for presentation purposes.

AUDIT RESULTS

Finding 1. Management of Official Time Lacked Adequate Controls

We found that the use of official time has improved relations between management and labor unions because official time facilitates working jointly to develop solutions or improvements to address workplace challenges. However, GPO lacked adequate controls, processes, and guidance to ensure that official time used was consistently and accurately recorded in webTA or had met activities authorized by the Statute or CBA provisions. Based on our analysis of CY 2021 webTA data, documentation reviews, and interviews, official time was under-reported or unsupported as required. This occurred because employees and supervisors followed practices that were not always consistent with CBA provisions; recording and/or reporting official time differed from one business unit to the next; challenges with using the “reasonable and necessary” time approach to manage official time; and, monitoring the use of official time for compliance is not required. Absent adequate controls and processes, GPO cannot determine the overall costs of support for union activities, the amount of official time used, the number of people using official time, and whether official time was used as intended.

Under-reported Official Time

The use of official time by employees and union officials/representatives for various union activities is an established practice at GPO. Our analysis of CY 2021 webTA data identified that a total of 15 employees recorded 1,034 hours of official time in webTA, as shown in [Table 1](#). Seven of the 15 employees were union officials/representatives, and their official time hours, made up 94 percent (848 of 901 hours) of statutory rights or negotiated (representational) activities and 88 percent (117 of 133 hours) of union-LWOP activities.

Table 1. CY 2021 Official Time Hours Recorded in webTA

	Employee Number	Representational Hours	Percentage of Total	Union-LWOP Hours	Percentage of Total	Total Hours
Union Officials / Representatives	43	6	0.7%			6
	4	7	0.8%			7
	14	14	1.6%			14
	6	17	1.9%			17
	16	24	2.5%			24
	5	214	23.5%			214
	1	566	63%	117	88%	683
	Subtotal	848	94%	117	88%	965
Employees	29			16	12%	16
	2	1	0.1%			1
	13	1	0.1%			1
	8	2	0.2%			2
	7	5	0.6%			5
	40	8	0.9%			8
	23	16	1.8%			16
	19	20	2.3%			20
	Subtotal	53	6%	16	12%	69
CY 2021 Total	901	100%	133	100%	1,034	

Source: GPO webTA

The absence of official time recorded in webTA for 32 (82 percent) of the 39 union officials/representatives designated by labor unions suggested that they did not participate in union activities in CY 2021. However, that was not the case. Through our documentation reviews and interviews with all 39 designated union officials/representatives and 30 supervisors, we found that official time was systemically under-reported in webTA. For example:

- On September 23, 2021, a Bargaining Unit A⁹ official/representative used official time and reported it on their department's daily production report form, but not in webTA. The supervisor did not believe hours used for official time needed to be recorded in webTA.
- On December 14, 15, and 17, 2021, a Bargaining Unit B official/representative reported 5 hours of official time in the Facilities work orders system, but not in webTA. A second Bargaining Unit B official/representative reported 6.5 hours of official time used in September and December 2021 in the Facilities work orders system, but not in webTA. The supervisor stated that employees only need to record official time in the Facility work orders system.
- On November 2, 17, and 22, 2021, a Bargaining Unit C official/representative reported 5 hours of official time in the Facilities work orders system, but not in webTA. The supervisor relied on the employee to maintain and report their official time.
- On September 13, 2021, a Bargaining Unit D official/representative informed their supervisor that they had a union meeting on Capitol Hill at 10 a.m. There was no record of official time recorded in webTA for the meeting. The supervisor asserted that employees only need to record official time in the Productivity Reporting for Operations, Budgeting, and Expenditures (PROBE) system.¹⁰
- On February 3 and 10, 2021, two Bargaining Unit E officials/representatives attended two union-related meetings. Labor Relations officials notified supervisors of the two individuals on the day of each meeting that they were authorized to use official time. However, the two individuals did not record official time in webTA for these meetings and their supervisors did not ensure they recorded the correct time and attendance prior to validating their timesheets.
- A Bargaining Unit F official/representative used an average of 14 hours of official time per month. A Bargaining Unit G official/representative used an average of 3 hours of official time per week. A Bargaining Unit H official/representative used an average of 6 hours of official time per week. However, there were no records of official time recorded in webTA in CY 2021 for the three individuals. Based on the three individuals' assertions on their average use of official time, there was a potential risk of under-reporting about 600 hours of official time annually.

⁹ To protect the identity of individuals, we used generic bargaining unit names in the report where appropriate.

¹⁰ Plant Operations employees use the PROBE system to log their daily production activities.

During our January 24, 2022 discussion with Labor Relations officials, they informed us that although they received bi-weekly webTA reports from Finance, they did not actively monitor official time usage. In subsequent discussions, Labor Relations officials acknowledged that some union officials/representatives did not record official time in webTA. Labor Relations officials added that certain union officials/representatives' official time did not appear in webTA reports even though they attended union meetings about the new GPO Apprenticeship Program. Based on our audit, Labor Relations officials issued an email to all union partners on April 21, 2022, reminding union officials/representatives to request official time as early as possible and supervisors to closely monitor official time requests to make sure that accurate data is entered into webTA.

Unsupported Official Time

Of the seven union officials/representatives that recorded official time in webTA, as identified in [Table 1](#), we found that four individuals recorded full work days to official time. Specifically, as shown in [Table 2](#), the four individuals recorded a total of 632 hours, or 79 scheduled 8+hour workdays, to official time in CY 2021. This represents 66 percent (560 of 848 hours) of official time used for representational activities and 62 percent (72 of 117 hours) of official time used for union-LWOP activities.

Table 2. CY 2021 Official Time Recorded to 8+hour Days

	Employee Number	Representational Activity			Union-LWOP Activity		
		Total Hours	Number of 8+ Hour	8+ Hour Days	Total Hours	Number of 8+ Hour	8+ Hour Days
Union Officials / Representatives	43	6	0				
	4	7	0				
	14	14	0				
	6	17	16	2			
	16	24	24	3			
	5	214	48	6			
	1	566	472	59	117	72	9
	Total	848	560	70	117	72	9

Source: GPO webTA

Labor Relations officials informed us that they generally do not know the specific purpose for official time usage except in instances involving management sponsored meetings and trainings, negotiations, and/or step 3 grievances¹¹ and arbitrations. Labor Relations officials added that GPO ended the practice of union officials charging 100 percent of their duty time to official time in CY 2015.¹² According to CBAs, supervisors are responsible for approving or denying official time based on operational needs.

We tested CBA provisions that use the “reasonable and necessary” time approach – one that is not defined in terms of a specific number or percentage of hours – to manage official

¹¹ In the step 3 grievance process, a Joint Grievance Committee will be established. It will consist of three union representatives, appointed by the president of the union involved, and three management officials.

¹² In December 2014, Labor Relations notified impacted individuals that management will enforce official time provisions as written in CBAs to control costs and ensure accountability for compliance with all applicable laws and CBAs.

time. We requested documentation from the four individuals identified in [Table 2](#) and their supervisors to support the 560 representational and 72 union-LWOP hours of official time used. As shown in [Table 3](#) and followed by explanations below, we found that three of the four individuals could not support their use of official time.

Table 3. Official Time Usage Was Supported

Employee No.	Supported	Unsupported
6		√
16	√	
5		√
1		√

Source: GPO employees

- Employee no. 6 recorded 8 hours each day on December 10 and 17, 2021. We reviewed documents that showed the employee requested four hours each for official time and sick leave for December 10, 2021. The employee did not request any official time for December 17, 2021. The supervisor explained that this employee “*sometimes used [their] official time hours at a later date.*” However, employee no. 6 did not provide any documentation to support that assertion. Consequently, the request and approval of 12 hours¹³ of official time may not meet CBA provisions or the statutory spirit of reasonableness, necessity, and public interest.
- Employee no. 16 requested 12 hours of official time each day on November 8 and 12, 2021 to attend the collective bargaining seminar, held in Las Vegas, Nevada. The supervisor authorized 24 hours of official time and required the employee to use annual leave for the remaining conference days. Based on FOP CBA provisions¹⁴ the request and approval of 24 hours of official time were supported.
- Employee no. 5 recorded 8 hours each day on August 12 and December 6, 7, 8, 9, and 10, 2021 to official time. In response to our inquiry, this employee explained that the “*webTA entry was a mistake on my part. I worked a full day on 8/12/21.*” For the five days in December, the employee requested 40 hours of official time to attend union-sponsored training. Employee no. 5 was not aware of Master CBA¹⁵ provisions that state up to 24 hours (per year) of official time may be used for union-related training. Employee No. 5 emphasized that the supervisor approved the official time. We learned that the supervisor was also not aware of the Master CBA provisions regarding training. Consequently, the request and approval of 24 of the 48 hours¹⁶ of official time may not meet CBA provisions or the statutory spirit of reasonableness, necessity, and public interest.

¹³ December 10 (4 hours) and December 17 (8 hours), 2021.

¹⁴ Article 7, §6.

¹⁵ Article 3, §7.

¹⁶ Eight hours each on August 12, December 9, and December 10, 2021.

- Employee no. 1 recorded 68, 8-hour days, in CY 2021 to official time, as shown in [Table 4](#). Due to the ostensibly routine use of official time from May through December 2021, we interviewed the individual, supervisors, and Labor Relations about the request and approval processes for official time usage.

Table 4. Employee No. 1’s Official Time Recorded to 8-hour Days

CY 2021	Representational		Union-LWOP		Total	
	8-hour Days	Hours	8-hour Days	Hours	8-hour Days	Hours
February	1	8	0	0	1	8
May	4	32	0	0	4	36
June	6	48	3	24	9	48
July	7	56	1	8	8	64
August	5	40	1	8	6	46
September	6	48	0	0	6	54
October	6	48	3	24	9	57
November	8	64	0	0	8	64
December	16	128	1	8	17	136
Total	59	472	9	72	68	544

Source: GPO webTA

Employee Response

Employee no. 1 explained that they emailed their supervisors the time and code for to input their official time in webTA because the business unit does not allow employees to use webTA. Employee no. 1 added that they had always notified their supervisors ahead of their scheduled work shift that began at 11:30 p.m. (shift 3). We showed employee no. 1 that many of the emails were sent at the start or during the scheduled work shift informing supervisors that they would be on official time for 8 hours on the day shift (shift 1) or from 4 a.m. to noon. We asked employee no. 1 why they didn’t “clock-in” to PROBE as required. Employee no. 1 stated that they were *“preoccupied the moment [they] start work...work is difficult, gets distracted hearing others complain.”* Clocking in and out “slipped [my] mind.”

We asked employee no. 1 to briefly describe what representational activities were performed from December 19 through 31 (pay period 26, 2021) that required official time for seven days on shift 1. We provided employee no. 1 with the specific dates in question - December 20, 21, 22, 23, 27, 29, and 30. Employee 1 asserted that *“I do not remember and do not have records because it was not a requirement.”* Employee no.1 added that they were never told or asked to maintain a separate union activity log.

In response to our inquiry, employee no. 1 stated that they took union-LWOP to deal with *“big issues when [the] supervisor does not approve union activity time.”* We asked employee no. 1 if the supervisor ever denied official time requests. Employee no. 1 said no, but added that union-LWOP was not a cost to GPO because the Bargaining Unit I paid for the time.

We asked employee no. 1 why they didn't follow the Master CBA provisions on requesting and reporting official time. Employee no. 1 said that supervisors approved all their official time, and added that it was not required to state who they met with or what the activity was. Employee no. 1 said, *"I did what I have always done."*

Supervisor Response

Supervisors stated that they were notified by email when employee no. 1 was not going to report to work on the 3rd shift but instead take official time or union-LWOP, as shown in [Table 5](#).

Table 5. Examples of e-Mail Notifications of Official Time

Date/Time	Content
Thursday, May 27, 2021 11:43 PM	<i>"I won't be in tonight 8hrs 608-13"</i>
Wednesday, June 23, 2021 10:44 PM	<i>"I'll be in at 4 am to 12 noon 8hrs 608-13 for tonight"</i>
Thursday, July 8, 2021 11:34 PM	<i>"8hrs ulwp for tonight"</i>
Monday, September 20, 2021 3:25 AM	<i>"8hrs ULWP for tonight"</i>
Wednesday, September 29, 2021 12:00 AM	<i>"Hitting in at 4 am to 12 noon 8 hrs 608-13"</i>
Thursday, October 21, 2021 11:21 PM	<i>"8 hrs ULWP"</i>
Monday, October 25, 2021 12:53 AM	<i>"8hrs ulwp"</i>
Sunday, November 14, 2021 10:52 PM	<i>"Working dayside in the morning various meetings. 608-13 for tonight 8hrs"</i>
Wednesday, November 24, 2021 6:05 PM	<i>"Union time for this week 8hrs 608-13 for various meetings throughout the week SID and side issues with the wage agreement."</i>
Wednesday, December 15, 2021 11:30 PM	<i>"Meeting from Thursday to Monday 608-13 for all the days I'll be working dayside thanks"</i>
Sunday, December 26, 2021 11:31 PM	<i>"Time 8 hrs 608-13 I'll be in at 4 am to 12noon meetings (arbitration) preparation grievance JCU"</i>
Monday, December 27, 2021 11:01 PM	<i>"8 hrs 608-14 preparation for arbitration JCU performance plans bonuses being denied in at 4-12 noon"</i>

Source: GPO employee

Supervisors stated that they followed past practices and "blanketly approved" all official time for employee no. 1 even though the emails were vague. Supervisors believed employee no. 1 may have worked from home because employee no. 1 did not always come to the work site when they took an 8-hour day for official time. Supervisors also believed employee no. 1 took an excessive amount of official time. Supervisors stated that when employee no. 1 *"ran out of leave around the holiday of 2021, more union business came about."* As for union-LWOP, supervisors stated that employee no. 1 took union-LWOP at any time, but believed that it was fine because GPO did not pay for union-LWOP.

Supervisors acknowledged that they overlooked employee no. 1's continuous habit of not scanning into PROBE due to their bargaining unit position despite the requirement to do so. Supervisors also corroborated the assertion that employee no. 1 was not required to use webTA. Although not compliant with GPO's time and attendance policy,¹⁷ supervisors stated that the unit has a long-standing practice for the timekeeper to validate timesheets instead of individual employees.¹⁸

Supervisors stated that their unit's production has not been affected because other employees would pick up employee no. 1's workload. However, it has caused friction with other employees due to the perceived unfairness. Supervisors stated they have raised their concerns about the potential abuse of official time to their manager and Labor Relations officials. Supervisors stated that they did not know if they had any authority or right to ask for more information; they opined that Labor Relations should provide training on managing official time.

Labor Relations Response

Labor Relations officials stated that employee no. 1's official time may have increased due to wage re-negotiations from the end of Summer to Fall 2021 before the new wage agreement was signed in November 2021. We informed Labor Relations officials that our analysis of webTA data did not show any uptick in official time hours during this period. Labor Relations officials could not explain what representational work was performed when employee no. 1 took 8-hour days for official time. They acknowledged that employee no. 1 charging ten days to official time during holiday weeks was excessive (three days during the Thanksgiving week and seven days between the Christmas and New Year holidays). Labor Relations officials asserted that it was the supervisor's responsibility to reject official time when they deemed questionable. Labor Relations officials added that granting two hours to attend a meeting was generous and that supervisors should have said no for all those 8-hours days. We asked if there was any potential for abuse of official time, and Labor Relations officials said yes.

Given the cost of the official time, the lack of oversight, and the absence of supporting documentation, we question whether the 68 days (472 for representational and 72 for union-LWOP activities) used by employee no. 1 met CBA provisions or the statutory spirit of reasonableness, necessity, and public interest. Of the 544 hours, 472 hours were for representational activities. Also, we believe that there is an inherent cost to the unit's production and morale when an employee takes excessive union-LWOP.

¹⁷ GPO Directive 440.12A, §6.e.(3)

¹⁸ The OIG reported this issue in a prior audit, *Employees Detailed to Congress*, report number 21-11, dated September 17, 2021.

Conclusion

The use of official time is authorized in the Statute as being in the public interest and established in CBA provisions. The legal obligation to grant official time reinforces the need for oversight and accountability for the Agency's 11 labor unions representing about 900 bargaining unit employees eligible to use official time. GPO reported that 62 employees used 5,243.5 hours, of official time from calendar years (CY) 2017 through 2021. It is important that sufficient controls, processes, and guidance are in place for requesting, approving, reporting, recording, and monitoring to provide reasonable assurance that official time:

- is used as intended;
- is consistent with the statute, CBA provisions, and applicable GPO policies and procedures;
- is recorded in GPO's official time and attendance system;
- informs management and labor decision making; and
- provides public transparency.

Since GPO manages the use of official time under a "reasonable and necessary" time approach (without a specified number of hours), the Agency risks improper use or even abuse. The process to request, approve, report, and record official time differed from one business unit to the next. In addition, supervisors were unfamiliar with their rights and responsibilities and did not always reach out to Labor Relations for guidance. Lastly, monitoring the use of official time for compliance is not required. Consequently, GPO cannot determine the overall costs of support for union activities, the amount of official time used for union activities, the number of people using that time, and whether official time was used as intended.

Recommendations for the Director:

Recommendation 1: enforce collective bargaining agreement provisions on official time by requiring supervisors and all bargaining unit employees to accurately and timely request, approve, record, and report official time in one system, GPO's official time and attendance system.

Recommendation 2: enforce that all employees validate their timesheets in webTA prior to supervisory certification as required by GPO Directive 440.12A.

Recommendation 3: require employee numbers 5 and 6 to adjust timesheets for official time incorrectly recorded in webTA identified in this audit.

Recommendation 4: require Labor Relations to evaluate any practices that employee No. 1 and their supervisors have established with respect to official time and enforce practices that are aligned with the Statute and collective bargaining agreement provisions.

Recommendation 5: provide employees and supervisors training on the use and management of official time.

Recommendation 6: require Labor Relations to implement procedures to monitor official time usage, determine whether it is being used within the confines of collective bargaining agreements, and report inappropriate usage to management for corrective actions.

MANAGEMENT'S COMMENTS

Management generally agreed with the finding and all recommendations. See [Appendix E](#) for management's comments in their entirety.

Regarding finding 1, management stated that many of the report's findings relate to record-keeping weaknesses and there was no finding of malfeasance. Management also stated that they are committed to improving its record-keeping.

Regarding recommendation 1, management stated that while they agreed that all time and attendance information, including official time, should be recorded in webTA, they believed that it is necessary for webTA timekeepers to continue to record time and attendance for those production employees without direct access to webTA. Management stated they will review its policies and procedures to improve recordkeeping and documentation for recording official time and implement any necessary managerial and supervisory changes. The target implementation date is December 31, 2022.

Regarding recommendation 2, management stated that they agreed that teammates should validate timesheets bi-weekly as required by GPO Directive 440.12A, *Web Time and Attendance (webTA)*. However, management asserted that many employees do not use webTA or input their own pay data. Management stated that they will develop new procedures to have teammates who do not routinely use webTA validate their timesheets on a bi-weekly basis through another method. The target implementation date is December 31, 2022.

Regarding recommendation 3, management stated that they must better document the determination for cases where official time for trainings exceeds the amount set forth in the collective bargaining agreements (CBA) to meet CBA standards and the Statue. Management will adopt a written procedure to evaluate any such request. The target implementation date is December 31, 2022.

Regarding recommendation 4, management stated that Labor Relations will work with Employee No. 1's supervisors and managers to improve compliance with the CBA to include addressing deficiencies in official time requests and internal auditing of requests and approvals. Management also stated that Labor Relations will provide supervisors and union representatives training and information as needed. Management did not provide a target implementation date.

Regarding recommendation 5, management stated that Labor Relations will coordinate with appropriate GPO divisions to create and deploy training for union representatives and supervisors that will cover the statutory and contractual requirements for official time. The training will include best practices to improve record keeping and documentation. The target implementation date is September 30, 2023.

Recommendation 6, management stated that Labor Relations will use existing reports on official time data to monitor official time on a bi-weekly basis and raise questions about any

hours that do not meet the CBA criteria. Management did not provide a target implementation date.

Regarding the cost impact, management stated that the majority of the hours questioned in the report involved Employee No. 1, where there was little documentation about the nature of the official time requests. Management stated that they believed the questions regarding cost could be resolved with better documentation. Management also stated that they will work to improve documentation on the part of management and supervisors and encourage employees requesting official time to further document their use of such time.

EVALUATION OF MANAGEMENT'S COMMENTS

As stated in the cover letter to this report, the OIG considers management's comments responsive to recommendations 1 through 6 and corrective actions planned should resolve the issues identified in the report. However, we consider the characterization of the report's finding as identifying "record-keeping weaknesses" as dismissive. Our report repeatedly provided a fair representation of inconsistent or negligent management controls, processes, and guidance that impact a program affecting half the workforce. In our opinion, this is not a minor "record keeping" issue.

Additionally, with regard to a key element of the finding, their rationalization for relying on time-keeping methods outside of the official time and attendance system (and subsequently leading to their problematic oversights), management omits that they have provided enough computers and offices for all onsite union officials to use. The Agency has also installed webTA kiosks on the production work floors to enable other employees maximum access to webTA.

The Agency also disagreed "with the premise that every 8-hour request by Employee No. 1 was per se inappropriate." To clarify, we did not determine nor opine on their appropriateness. We questioned the recorded hours and alerted management. We based our analysis on extensive documentation reviews and discussions with the employee and supervisors in order to bring those examples to management's attention. Taken in sum, the Agency's attitude towards this report's finding raises concerns about the commitment to remedy the issues identified.

The Agency also notes that the Inspector General cannot exercise authority to determine what is "reasonable," "necessary," or "in the public interest" regarding Employee No. 5's use of official time for training. This is something of a misdirection. The report makes no such claims but simply points out where management did not follow its own guidelines, rules or regulations, or in some cases basic supervisory practices. It is for the reader to decide whether this is "in the public interest." Regardless, we stand by our analysis and made our determination for the Agency to consider, which is part of our broad statutory oversight authority.

APPENDICES

Appendix A. Objective, Scope and Methodology

Our objective was to assess the management and use of official time for union activities by GPO employees in bargaining units. The scope of the audit included official time reported in CYs 2017 to 2021. GPO reported that 62 employees used 5,243.5 hours of official time from CYs 2017 through 2021. We selected CY 2021 for our analysis because it was the most recent, complete calendar year of official time data available for 39 union officers and representatives currently designated by GPO's 11 labor unions.

To accomplish the objective, we:

- Reviewed the applicable statute that requires federal agencies to authorize official time and the four collective-bargaining agreements at GPO.
- Interviewed Labor Relations officials, union officers/representatives, and supervisors to identify and gain an understanding of the processes used to request, approve, report, record, and monitor official time.
- Advised individuals that the information we obtained from interviews, meetings, and document requests may be used in the report, as appropriate.
- Reviewed 1,165 union official time transactions recorded in webTA from CYs 2017 through 2021.
- Tested to determine whether the use of official time was supported by a request from the employee and approval by the employee's supervisor.

We conducted this performance audit from January through September 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 findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on June 28, 2022, and included their comments where appropriate.

Computer-Generated Data

We assessed the reliability of time and attendance data in webTA 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 OIG Coverage

The OIG did not identify any prior audits, inspections, or investigations related to the objective of this audit within the last five years.

Appendix B. Table of Recommendations

Recommendation	Management Response	Status	Return on Investment
Director, GPO			
<p>1. Enforce collective bargaining agreement provisions on official time by requiring supervisors and all bargaining unit employees to accurately and timely request, approve, record, and report official time in one system, GPO's official time and attendance system.</p>	<p>Concurred. Target Implementation Date (TID) December 31, 2022.</p>	<p>Open</p>	<p>Nonmonetary - Improve management controls, systems, and processes, and provide data to decision makers.</p> <p><i>Requiring employees to use the official time and attendance system to request, approve, record and report official time should improve data quality and enable a less labor intensive and more efficient process for the agency to collect, track, and report reliable data on the usage level of official time.</i></p>
<p>2. Enforce that all employees validate their timesheets in webTA prior to supervisory certification as required by GPO Directive 440.12A.</p>	<p>Concurred. TID December 31, 2022.</p>	<p>Open</p>	<p>Nonmonetary - Improve management controls, systems, and processes, and provide data to decision makers.</p> <p><i>Enforcing employees to validate their work and leave hours in the official time and attendance system will improve the accuracy and timeliness of workhour administration.</i></p>
<p>3. Require employee numbers 5 and 6 to adjust timesheets for official time incorrectly recorded in webTA identified in this audit.</p>	<p>Concurred. TID December 31, 2022</p>	<p>Open</p>	<p>Nonmonetary Improve management controls and provide data to decision makers.</p> <p><i>Requiring employees to correct timesheets for official time incorrectly recorded in the official time and attendance system will improve data quality and</i></p>

Recommendation	Management Response	Status	Return on Investment
			<i>provide the agency accurate usage level of official time.</i>
<p>4. Require Labor Relations to evaluate any practices that employee No. 1 and their supervisors have established with respect to official time and enforce practices that are aligned with the Statute and collective bargaining agreement provisions.</p>	<p>Concurred.</p>	<p>Open</p>	<p>Nonmonetary - Improve management controls; provide data to decision makers; and avoid violations of law or regulation.</p> <p><i>Evaluating, identifying, and remedying any practices not consistent with the Statutes and collective bargaining agreement provisions are essential to ensure official time is requested, approved, and recorded in the official time and attendance system appropriately.</i></p>
<p>5. Provide employees and supervisors training on the use and management of official time.</p>	<p>Concurred. TID September 30, 2023</p>	<p>Open</p>	<p>Nonmonetary - Improve management controls, systems, and processes; and avoid violations of law or regulation.</p> <p><i>Providing training and program guidance are essential to educate employees and supervisors on official time procedures, rights, and responsibilities to ensure that provisions for official time are administered appropriately as specified in relevant collective bargaining agreements.</i></p>
<p>6. Require Labor Relations to implement procedures to monitor official time usage, determine whether it is being used within the confines of collective bargaining agreements, and report inappropriate usage to management for corrective actions.</p>	<p>Concurred</p>	<p>Open</p>	<p>Nonmonetary - Improve management controls systems, and processes; and provide data to decision makers.</p> <p><i>Implementing monitoring activities will provide the agency an opportunity to strengthening its internal</i></p>

Recommendation	Management Response	Status	Return on Investment
			<i>controls and increasing transparency and accountability on the use and management of official time.</i>

Appendix C. Calendar Years 2017 - 2021 Official Time by Employees

Employee No.	Representational Hours by Calendar Year					Union-LWOP Hours by Calendar Year					Total Hours ¹⁹
	2107	2018	2019	2020	2021	2017	2018	2019	2020	2021	
1	625.00	389.00	500.00	132.00	566.00	35.00	16.00	54.00	45.00	117.00	2,479.00
2	64.00	79.00	66.00	395.00	1.00						605.00
3	174.50	167.00	29.00			11.00	9.00				390.50
4	42.00	70.00	100.00	26.00	7.00						245.00
5					214.00						214.00
6	35.00	49.00	51.00	32.00	17.00						184.00
7	49.75	8.00	29.00	27.00	5.00						118.75
8	25.00	58.00	5.00		2.00						90.00
9	80.00										80.00
10	72.00										72.00
11	18.00	49.00					12.00				79.00
12			48.00								48.00
13	7.75	9.00	20.00	4.00	1.00						41.75
14		14.00		3.00	14.00						31.00
15			24.00	2.00							26.00
16					24.00						24.00
17			13.00	8.00							21.00
18	17.50	1.00	2.00								20.50
19					20.00						20.00
20	19.00										19.00
21			16.00								16.00
22				16.00							16.00
23					16.00						16.00
24	5.00	8.00									13.00
25	4.00		8.00								12.00
26		3.00	8.00			28.50					39.50
27	3.00	8.00									11.00
28	5.00		6.00								11.00
29	7.00		4.00						16.00		27.00
30		8.00	2.00								10.00
31	3.00	4.00	2.00								9.00
32	1.00	8.00				88.00					97.00
33	8.50										8.50
34		3.00	5.00								8.00
35		8.00									8.00
36	8.00										8.00
37		8.00									8.00
38				8.00							8.00
39			8.00								8.00
40					8.00						8.00
41			8.00								8.00
42	6.00										6.00
43					6.00						6.00
44	1.00	3.00				2.00	8.00				14.00
45	4.00										4.00
46	4.00										4.00
47				4.00							4.00
48	4.00										4.00
49	4.00										4.00
50	4.00										4.00
51	3.00										3.00
52			3.00								3.00
53		3.00						8.00			11.00
54			3.00								3.00
55	3.00										3.00
56	2.00										2.00
57				2.00							2.00
58		2.00									2.00
59		2.00									2.00
60	2.00										2.00
61			1.00								1.00
62	1.00										1.00
Total	1,312.00	961.00	961.00	659.00	901.00	164.50	45.00	62.00	45.00	133.00	5,243.50

¹⁹ A new employee entering the federal workforce may work an average of 1,888 workhours per year [(52 weeks x 40 hours) - (13 annual leave days x 8 hours) - (11 federal holidays x 8 hours) = 1,888 hours]. Most federal employees earn 13 days of annual leave each leave year if they have less than three years of service, 20 days if they have three years but less than 15 years of service, and 26 days if they have 15 years or more of service.

Appendix D. Abbreviations

AFGE	American Federation of Government Employees
CBA	Collective Bargaining Agreement
CY	Calendar Year
FLRA	Federal Labor Relations Authority
FOP	Fraternal Order of Police
FY	Fiscal Year
GPO	U.S. Government Publishing Office
IAM	International Association Of Machinists
JCU	Joint Council of Union
LWOP	Leave Without Pay
OIG	Office of the Inspector General
PROBE	Productivity Reporting for Operations, Budgeting, and Expenditures
TID	Target Implementation Date
U.S.C.	United States Code
webTA	Web Time and Attendance

Appendix E. Report Distribution

Director

Deputy Director

General Counsel

Associate General Counsel, Labor Relations

Appendix F. Management's Comments

MEMORANDUM

Date: August 31, 2022
To: Inspector General
Subject: Agency Response for Draft Audit Report A-2022-001: Management and Use of Official Time

Thank you for the opportunity to offer the Agency's comments on the Draft Audit Report A-2022-001: Management and Use of Official Time. We welcome this opportunity to respond.

In General

Collective bargaining is a protected and encouraged right in the United States. The National Labor Relations Act (29 U.S.C. § 151) was enacted to encourage worker organizing and collective bargaining in the private sector and to promote equality of bargaining power between employers and employees. Similarly, when enacting the Federal Service Labor Management Relations Statute (5 U.S.C. § 7101(a)(1)), Congress found that “the statutory protection of the right of employees to organize, bargain collectively * * * and participate through labor organizations * * * safeguards the public interest, * * * contributes to the effective conduct of public business, and * * * facilitates and encourages the amicable settlements of disputes between employees and their employers.”

We appreciate the draft report's recognition of the solid relationship between the GPO management, its unions, and bargaining unit teammates. We believe these relationships should be protected because they ultimately accrue to the benefit of the Agency and the taxpayer.

The Agency also acknowledges that many of the draft report's findings relate to record-keeping weaknesses and there was no finding of actual malfeasance. The Agency is committed to improving its record-keeping as addressed in its responses to these recommendations.

The remainder of this memorandum is divided into two sections: (1) Agency responses to the specific recommendations in the draft report, and (2) a response to the cost impact and its underlying data assumptions.

Agency Response to Recommendations in the Draft Report

Recommendation 1

Enforce collective bargaining agreement provisions on official time by requiring supervisors and all bargaining unit employees to accurately and timely request, approve, record, and report official time in one system, GPO's official time and attendance system.

GPO concurs with this recommendation in part.

The Agency concurs that official time should be *recorded* in the Agency's official time and attendance system, WebTA. However, for some teammates *requesting* leave, including requesting official time, may continue to be accomplished outside of WebTA.

Implementing this recommendation as written would require process changes in production areas, extensive training, and would likely adversely impact production times and substantially increase Agency and customer costs. While the Agency concurs that all time and attendance information, including official time, should be recorded in WebTA, it is a business necessity that timekeepers continue to record time and attendance for those production employees without direct access to WebTA.

As noted above, the Agency will review its policies and procedures to improve recordkeeping and documentation for recording official time. The Agency expects to complete the review and implement any necessary managerial and supervisory changes by December 31, 2022.

Recommendation 2

Enforce that all employees validate their timesheets in webTA prior to supervisory certification as required by GPO Directive 440.12A.

GPO concurs with this recommendation in part.

The Agency notes that the recommendation as written misstates the GPO directive as requiring the use of WebTA to validate timesheets. GPO Directive 440.12A only requires that teammates “[v]alidate timesheets once bi-weekly,” (paragraph 5(e)(3)) and does not specify the use of WebTA as it does in earlier subparagraphs of the directive.

The Agency concurs that teammates should validate time sheets bi-weekly as required by the directive. Where the Agency differs is the method. As noted above, there are many employees who do not use WebTA or input their own pay data. They clock in and out using the PROBE system. PROBE also ties employees to work orders. Implementing this

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recommendation as written would require process changes in areas of production and extensive training. It would likely also require changes or updates to the accounting system at GPO.

The Agency also notes that this recommendation applies to all teammates, regardless of whether they are in a bargaining unit and claim official time or not, and thus appears to exceed the scope of this audit.

The Agency will develop new procedures to have teammates who do not routinely use WebTA validate their timesheets on a bi-weekly basis through another method by December 31, 2022.

Recommendation 3

Require employee numbers 5 and 6 to adjust timesheets for official time incorrectly recorded in webTA identified in this audit.

GPO concurs with this recommendation.

WebTA errors occur, and can easily be corrected as with the erroneous entry made by Employee no. 5 for August 12, 2021.

However, the Agency questions the Inspector General's finding that half of Employee no. 5's official time to attend union sponsored training "did not meet CBA provisions or the statutory spirit of reasonableness, necessity, and public interest." (p. 9) The Agency disagrees with the draft audit report's interpretation that the collective bargaining agreement establishes 24 hours as the absolute limit on the number of hours that can be authorized for training. The Master Labor Management agreement allows union officials to be paid official time for training: "The Employer agrees to allow a reasonable number of union representatives to attend, in a duty status, normally up to 24 hours per year, training designed to further assist the interest of the Government by bettering the labor-management relationship." (Article III, Section 7.) The inclusion of the word "normally" clearly contemplates that there may be instances which deviate from the norm.

Representational work requires a wide variety of skills that cannot always be taught or learned within 24 work hours. As a result, GPO allows union representatives to attend a wide variety of training, especially when it improves the relationship or enhances the skills of the Union representatives. In this instance, we concluded that the 40 hours of training are reasonable and fall within the spirit and intent of the CBA.

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The Agency also notes that the Inspector General cannot exercise authority to determine what is “reasonable,” “necessary,” or “in the public interest.” Those are management functions necessarily exercised by the head of the Agency or his delegates. While the Inspector General may raise questions about those determinations made by the head of the Agency, he has no authority to make a separate determination on his own.

The Agency recognizes that in cases where official time for training may exceed the amount set forth in the Master Labor Agreement or other CBAs, the Agency must better document the determination that it meets the standards in the CBAs and statute. The Agency will adopt a written procedure to evaluate any such request by December 31, 2022.

Recommendation 4

Require Labor Relations to evaluate any practices that employee No. 1 and their supervisors have established with respect to official time and enforce practices that are aligned with the Statute and collective bargaining agreement provisions.

GPO concurs with this recommendation.

Labor Relations will work with employee No. 1’s supervisors and managers to improve compliance with the CBA.

Completing this recommendation will include addressing deficiencies in official time requests, and include internal auditing of requests and approvals. The Agency will also ensure that the supervisors and union representative receive additional training and information as needed.

Recommendation 5

Provide employees and supervisors training on the use and management of official time.

GPO concurs with this recommendation.

Labor Relations will work with Human Capital and WDET to create training for union representatives and supervisors that will cover the statutory and contractual requirements for official time and will include direction on best practices to improve record keeping and documentation. The Agency expects to be able to design, implement, and deploy a training program by the end of fiscal year 2023.

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Recommendation 6

Require Labor Relations to implement procedures to monitor official time usage, determine whether it is being used within the confines of collective bargaining agreements, and report inappropriate usage to management for corrective actions.

GPO concurs with this recommendation.

GPO currently has a reporting structure that provides official time data on a biweekly basis. Labor Relations will continue to monitor this data and raise questions about any hours that do not appear to meet the CBA criteria.

Clarifications and Response to Cost Impact and Underlying Data Assumptions

1. The draft audit report states that “Since GPO manages the use of official time under a “reasonable and necessary” time approach (without a specified number of hours listed), the Agency risks improper use or even abuse.” (p. 13)

Agency Response: The “reasonable and necessary” standard exists across the Federal government and private industry in union representation and Equal Employment matters. It is a statutory right conferred to Federal bargaining unit employees in section 7131(d) of title 5, United States Code:

(d) Except as provided in the preceding subsections of this section—

(1) any employee representing an exclusive representative, or

(2) in connection with any other matter covered by this chapter, any employee in an appropriate unit represented by an exclusive representative,

shall be granted official time in any amount the agency and the exclusive representative involved agree to be reasonable, necessary, and in the public interest. (emphasis added.)

While abuse of official time use is possible, the “reasonable and necessary” standard is necessarily flexible. The amount of official time afforded for representational activities will vary with the circumstances, depending on the nature and complexity of the issue. The statute specifically does not limit official time, using the phrase “in any amount.” This standard allows the parties to evaluate official time use on a case by

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case basis. The intent is for employees to receive the full benefit of representation in every case, without the burden of an arbitrary limit on official time hours.

2. The draft audit report states that “The process to request, approve, report, and record official time differed from one business unit to the next.” (p. 13)

Agency Response: The GPO Directive recognizes that there are production units, including SID, where employees do not enter their own data and the Agency provides an alternative process in those cases. Variation, even among production areas, is a normal result of a long-standing contract and stable labor-management relationship.

The process for requesting and using official time has evolved to work differently in different areas. While the Agency agrees that using one system would be simpler, some business units use other systems in addition to WebTA, including the use of paper forms.

3. The draft audit report states that “Monitoring the use of official time for compliance is not required. Consequently, GPO cannot determine the overall costs of support for union activities, the amount of official time used for union activities, the number of people using that time, and whether official time was used as intended. In our test of four employees that took 8+hour days for representational activities, we questioned 488 of the 560 hours for three employees at a cost of about \$20,008.” (p. 13)

Agency Response: While the data on official time usage is not contained in one system, the information exists in several forms across GPO. The Agency believes that the majority of official time hours are appropriately used and the incidence of underreporting is small.

The majority of the hours questioned by the draft audit report involved one employee (Employee No. 1), where there was little documentation about the nature of the requests. The Agency disagrees that lack of documentation is proof of malfeasance, since documentation is not required by the Master Labor-Management Agreement.

The Agency also disagrees with the premise that every 8-hour request by Employee No. 1 was per se inappropriate. Employee No. 1 serves in multiple roles as a union officer, Union Steward, and a senior officer of the Joint Council of Unions (JCU). Historically, the official time used by the employee in the JCU role has been higher than other Union representatives (and higher than Employee No. 1). The Agency’s experience demonstrates that the varied nature of the work can and does require full days. As a

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result, the Agency believes that the questions regarding cost could be resolved with better documentation.

The Agency will work to improve documentation on the part of management and supervisors and encourage employees requesting official time to further document their use of such time.

Thank you for the opportunity to provide the Agency's input on this product from your office. The Agency spent approximately 48 hours preparing this response. If you have any questions, please contact me.



HUGH NATHANIAL HALPERN

cc: Deputy Director