

**MANAGEMENT CONTROLS FOR
ADMINISTRATIVE ACTIVITIES AT THE
SURFACE TRANSPORTATION BOARD**

Surface Transportation Board

Report Number: SC-2004-084

Date Issued: September 17, 2004




Memorandum

**U.S. Department of
Transportation**

Office of the Secretary
of Transportation
Office of Inspector General

Subject: **ACTION:** Report on Management Controls
for Administrative Activities at the Surface
Transportation Board
SC-2004-084

Date: September 17, 2004

From: Alexis M. Stefani 
Principal Assistant Inspector General
for Auditing and Evaluation

Reply to
Attn. of: JA-60

To: Chairman
Surface Transportation Board

This report presents the results of our audit of management controls for administrative activities at the Surface Transportation Board (STB). The review examined STB's compliance with regulations and the Board's policies for approving employee leave requests, using Government vehicles, administering the Government purchase and travel card programs, controlling personal property, preparing for emergencies, and securing STB facilities.

STB was established on January 1, 1996, as an independent adjudicatory body administratively housed within the Department of Transportation (DOT).¹ STB's jurisdiction includes railroad rate and service issues; rail restructuring transactions (i.e., mergers, line sales, line construction, and line abandonments) and related labor concerns; certain trucking, moving van, and non-contiguous ocean shipping company rate issues; and certain intercity passenger bus company structural, financial, and operational matters. For fiscal year (FY) 2003, STB received \$19.3 million in appropriations, with a staffing level of 145 full-time equivalent positions.

¹ In 1995, the Congress passed the Interstate Commerce Commission Termination Act (49 U.S.C. 10101), which abolished the Interstate Commerce Commission and created STB. The Act transferred many of the Commission's core rail functions to STB.

RESULTS IN BRIEF

For most of the areas we examined, STB was in compliance with applicable regulations and STB policies. For example, we found that STB leased its two Government vehicles consistent with General Service Administration (GSA) directives; properly used Government purchase cards; accurately recorded, inventoried, and reconciled personal property; had plans for responding to emergencies; and had taken steps to foster greater security. Nevertheless, we identified problems in two areas: employee leave requests and travel cards.

Specifically, we found that STB managers needed to strengthen management controls for documenting unscheduled absences from work.² Through our review of time and attendance transactions, we found supervisors provided the requisite written approvals for all scheduled absences. However, this was not the case for *unscheduled* absences, where supervisors permitted employees to use a sign in/out log in lieu of written requests for leave. Some staff used the sign in/out logs to record the type and duration of their unscheduled absences, and others left it up to timekeepers to remember and record staff absences. Supervisors did not consistently review the sign in/out logs.

In response to our finding, STB strengthened management controls for documenting unscheduled absences. Specifically, STB management revised the sign in/out form to include staff member certification, by initial or signature, of the type and duration of unscheduled leave taken. In addition, supervisors and timekeepers have been directed to review the sign in/out logs to ensure all employees are properly recording unscheduled leave. We consider these actions sufficient to resolve the control weaknesses found during our review.

We also identified a need for STB to strengthen its monitoring of travel card purchases and withdrawals. All of the 14 employees who traveled paid the service provider promptly. However, one employee abused his privileges by charging \$1,704 for personal expenses, including automobile rentals, an airline ticket, lodging, and cash withdrawals. STB was not monitoring monthly travel card expenses for misuse. By abusing his travel card, the employee violated his account agreement with Citibank, DOT travel card policy, and the Standards of Ethical Conduct for Employees of the Executive Branch.

In response, STB's travel card program coordinator immediately reprimanded, orally and in writing, the employee and took action to cancel his travel card privileges. In addition, the program coordinator is now monitoring Citibank activity reports for misuse by STB employees. Nevertheless, we recommend that

² Absences that were not scheduled or approved before being taken by employees, such as unexpected sick or emergency leave.

the Chairman of the STB periodically confirm continued compliance with DOT travel card policy regarding monitoring for misuse and delinquencies and ensuring any required disciplinary action is taken.

Management Comments and Office of Inspector General Response

A draft of this report was provided to STB on August 11, 2004, and STB provided written comments on September 2, 2004. STB concurred with the findings and recommendation. The actions taken and planned by STB are responsive to our recommendation and should strengthen STB's oversight of Government-issued travels cards. The complete text of management's comments is attached as an appendix to this report.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this audit was to determine compliance with regulations and Board policy for the following administrative activities: approving employee absences from work, using Government vehicles, administering Government purchase and travel card programs, controlling personal property, preparing for emergencies, and securing STB facilities. The audit was conducted in accordance with Government Auditing Standards prescribed by the Comptroller General of the United States. The audit reviewed administrative activities and management controls during FY 2003 through March 31, 2004.³ We interviewed managers and employees; reviewed regulations, policies, procedures, and records; and inspected work areas.

RESULTS

We found STB to be in compliance with applicable regulations and STB's policies for most of the administrative areas examined during our audit. Two exceptions involve problems associated with employee leave requests and travel cards. The following details our findings in each of the administrative areas examined during the audit, as well as actions undertaken by STB to correct the deficiencies we identified.

³ In November 2003, STB converted to a paperless payroll processing system operated by the Department of the Interior. Previously, the Environmental Protection Agency processed STB's payroll. Our tests covered STB's payroll for the period after the conversion: November 14, 2003, through April 3, 2004. We reviewed one 2-week time and attendance report for each of 54 employees. Of the employees included in our audit tests, 41 of 54 took leave: 20 had scheduled absences and 21 had unscheduled absences.

Unscheduled Employee Absences Were Not Properly Documented

Supervisors provided the requisite written approvals for all scheduled absences from work. This was not the case for unscheduled absences, where employees used a sign in/out log instead of a written request for leave. This practice did not, in our opinion, comply fully with STB Administrative Issuance 7-505, “Leave Administration,” which states:

Supervisors may allow employees to use annual leave...without filling out SF-71s; however, employees must sign their time and attendance form to certify that the leave was taken....When an employee returns to work, he/she will complete an SF-71, have it approved, and give it to the timekeeper; or the employee will initial the time card for the leave which was taken.

Supervisory authorization and approval is key to ensuring the propriety of time and attendance reporting. This did not always occur with unscheduled absences, because supervisors permitted employees to use the sign in/out log in lieu of a written request for leave. While some staff used the sign in/out logs to record the type and duration of their unscheduled absences, others depended on timekeepers to remember and record staff absences. In addition, some supervisors reviewed sign in/out logs but others did not.

In response to our observations, STB strengthened management controls for documenting unscheduled leave. Specifically, STB management revised the sign in/out form to include all the elements of an SF-71: staff member’s certification, by initial or signature, of the type and duration of unscheduled leave taken; fields that specifically identify the type and hours of leave taken; and a ratification block for supervisory approval. In addition, supervisors and timekeepers have been directed to review the sign in/out logs to ensure all employees are properly recording unscheduled leave. While we consider these actions sufficient to resolve the management control weaknesses found during the audit, supervisory vigilance remains critical to ensuring absences are reported fully and accurately.

Government Vehicles Were Used in Accordance with GSA Directives

We found that STB complied with GSA directives for leased vehicles.⁴ STB currently leases two cars from GSA. These leases, which are based on a fixed

⁴ Generally, STB staff used each car several times weekly (an average of 10 miles per trip) in the Washington, DC, metropolitan area. We did not determine whether GSA-leased vehicles were the most cost-effective means of obtaining needed transportation, considering other factors such commercial leases, taxis or mass transit, and convenience to the Government.

monthly and mileage rate according to vehicle type, include maintenance and fuel expenses. Monthly leases for the two cars are \$168 and \$236, respectively. In addition, STB pays 10.5 cents per mile traveled for each car. Through our review of the directives, evaluation of records kept for the vehicles, physical observation of the vehicles, and discussions with various STB staff, we found program administrators appropriately safeguarded the vehicles, credit cards for maintenance and fuel, and keys against damage, theft, or misuse. In addition, STB provided requisite usage data to GSA each month and prohibited employees from using the vehicles for personal transportation.

Staff Used and Managed Government Purchase Credit Cards Properly

We found that cardholders, approving officials, and program coordinators used and managed purchase cards consistent with STB Administrative Issuance 5-130, "Use of the Government-Wide Purchase Credit Card." This guidance, which is based on Federal acquisition regulations, defines the Government purchase card program, explains each cardholder's duties, and provides detailed instructions about what purchases can or cannot be made with the card. STB cardholders made 1,015 purchases (\$1.1 million) during FY 2003 and 376 purchases (\$330,800) during the first 6 months of FY 2004. As part of the audit, we reviewed supporting documentation for 132 purchases and, where necessary, obtained clarifying information from various STB staff.⁵ Overall, we found cardholders:

- Supported all purchases with detailed purchase orders, all of which were approved by STB managers before the goods or services were ordered.
- Solicited required competitive bids for all purchases exceeding \$2,500.
- Reconciled goods and services to date-stamped vendor invoices.
- Reconciled vendor invoices to purchase orders and monthly purchase card bank statements, which were reviewed by STB managers.

⁵ Our judgmental sample of 132 purchases worth \$538,000 considered factors such as the merchant code, dollar value, and description of goods and services.

An STB Employee Misused His Government Travel Card for Personal Expenses and Cash

Fourteen STB employees used Government travel cards for 131 transactions totaling \$15,885.⁶ Of these totals, we identified one employee who abused his privileges by charging \$1,704 for personal expenses, including automobile rentals, an airline ticket, lodging, and cash withdrawals. STB was not performing monthly reviews for travel cards misuse. By abusing his travel card, the employee violated his account agreement with Citibank, DOT travel card policy, and Standards of Ethical Conduct for Employees of the Executive Branch.

Citibank, a contractor under GSA's SmartPay Travel Card Program, is STB's service provider for travel cards. Federal Travel Regulations state that each employee who receives a travel card is responsible for using it for official purposes only and for paying the charges promptly. With the travel card, each employee receives a Citibank account agreement specifically stating that the employee is prohibited from using the card for "personal, family, or household purposes." The card is clearly imprinted "For Official Government Travel Only."

Furthermore, DOT's Assistant Secretary for Budget and Programs and Chief Financial Officer issued a department-wide travel card policy in March 2002 that states:

When employees apply for a contractor-issued credit card, they assume the responsibility to use the card for official purposes and pay the charges in a timely manner. These responsibilities are explained in the Cardholder Agreement that each employee signs during the application process.

This policy also requires that Operating Administrations have their designated travel card program coordinators monitor monthly delinquency reports provided by Citibank and provide the reports to supervisors of delinquent employees for appropriate action. The policy further directs supervisors to take disciplinary actions for misuse. STB's schedule of disciplinary actions for misuse ranges from oral admonishment to written reprimand for a first offense, written reprimand to a 5-day suspension for a second offense, and card revocation to removal from STB employment for a third offense. In June 2003, DOT issued policy revisions that included new requirements for the Operating Administrations regarding

⁶ We limited our review of transactions to STB employees who used travel cards for the 12 months that ended March 31, 2004. We identified abuse by comparing STB travel vouchers to Citibank credit card activity reports. As for delinquencies, OIG Report Number SC-2004-067, "Follow-up Audit on DOT Travel Card Delinquencies and Charge Offs," June 29, 2004, included an assessment of delinquent accounts by Operating Administration for the period August 2003 through March 2004. That audit did not identify any STB employees with delinquent accounts.

monitoring for misuse, limits on cash withdrawals, delinquencies, and disciplinary actions. The Government's Standards of Ethical Conduct of Employees of the Executive Branch also covers misuse of travel cards.

In response to our finding, STB's travel card program coordinator immediately reprimanded, both orally and in writing, the employee who misused his travel card. In addition, the coordinator took action to cancel the employee's travel card privileges and is now monitoring Citibank activity reports each month for misuse by STB employees. Together, the disciplinary action⁷ and increased monitoring should strengthen STB oversight of travel card use.

Personal Property Was Accurately Recorded, Inventoried, and Reconciled

STB has an effective process for controlling personal property. STB's inventory of accountable personal property includes 550 items worth slightly more than \$1 million. We conducted a physical inventory of 64 randomly selected items (ranging from \$503 to \$11,672) included in STB's inventory. In addition, we conducted a reverse inventory by tracing seven randomly selected items, such as printers and fax machines, from the "floor" to STB inventory records. We either located or accounted for each of the items included in our physical inventory and traced all items selected from the floor to inventory records.

We found STB accounts for any personal property item costing more than \$500, which is more restrictive than DOT requirements.⁸ In addition, STB periodically inventories and reconciles personal property; the last physical inventory was conducted in May and June 2003. At that time, STB did not locate two items, a computer terminal and an electronic switch, together valued at \$1,497. STB completed the requisite Report of Survey for the two items, which disclosed that the computer terminal had been returned to another Federal agency from which it had been borrowed and the switch had been returned to the vendor. STB inadvertently had not adjusted its records to reflect the returned items.

⁷ These actions were also consistent with the Department's Table of Offenses and Disciplinary Actions for Delinquent and Unauthorized Use of the Government Travel Charge Card in Chief Financial Officer Policy 06-03: "Travel Card Management."

⁸ DOT Handbook H-4410.4, *Equipment Management and Control*, includes requirements for designating, training, and assigning responsibilities to property officers and custodians; recording specific equipment in property records; and conducting physical inventories. This handbook requires DOT agencies to account for personal property having an acquisition cost of \$1,000 or greater. STB Administrative Issuance 5-305, "Inventory Management Services/Property Management," supplements the DOT handbook.

Plans Are in Place for Responding to Emergencies and Steps Have Been Taken To Foster Greater Security

STB's Business Continuity Plan is intended to protect STB personnel and mission critical applications.⁹ This plan includes an Occupant Emergency Program Plan, which was last revised in April 2003.¹⁰ Distributed to all employees, the Occupant Emergency Program Plan identifies the building owner and STB responsibilities, duties of key personnel in the event of any emergency, training for STB personnel, and emergency and evacuation procedures. It also includes specific actions for responding to bomb threats, demonstrations, fires, explosions, severe windstorms, earthquakes, biological or chemical incidents, hostage situations, and serious incidents such as assault or rape. Finally, the plan identifies building access controls, procedures for responding to sudden cardiac arrest, and procedures for handling suspicious mail. Over the last year, STB has held training sessions to familiarize plan participants with new procedures and an "all hands" meeting to discuss basic details of the plan with employees. STB also conducted an unplanned building evacuation in December 2003. STB has emergency supplies and first-aid kits for each STB employee and additional stores for visitors.

The Federal Protective Service, which has assessed STB facilities as a "low" security risk, conducts random inspections of STB's contract guard service. While no problem areas were identified, STB needs to remain vigilant in regularly reviewing its security plan and making necessary adjustments.

RECOMMENDATION

We recommend that the Chairman of the STB periodically confirm continued compliance with DOT travel card policy regarding monitoring for misuse and delinquencies and ensuring any required disciplinary action is taken.

MANAGEMENT COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE

A draft of this report was provided to the Chairman, Surface Transportation Board, on August 11, 2004. The Chairman responded on September 2, 2004, concurring with our findings and recommendation. (See the appendix to this report for the complete text of the Chairman's comments.) The actions taken and planned by STB are responsive to our recommendation.

⁹ STB's Business Continuity Plan supports DOT's Continuity of Operations Plan, which centers on the business processes of DOT and its agencies.

¹⁰ The Department of Homeland Security's Federal Protective Service approved STB's Occupant Emergency Program Plan.

To strengthen controls for documenting unscheduled leave, the Director for STB's Office of Economics, Environmental Analysis and Administration issued a memorandum to Office Directors and employees reminding them that all periods of absence must have supervisory approval. In addition, the memorandum requires that unscheduled, unplanned absences be documented by either an approved Office of Personnel Management Form 71, Request for Leave or Approved Absence, or a Work Schedule Control Sheet. Office Directors are accountable for ensuring Work Schedule Control Sheets have supervisory ratifications.

To preclude abuses of travel cards, STB has been downloading cardholder monthly activity reports since May 2004. The coordinator for STB's travel card program has been monitoring these reports for unauthorized activity or delinquent accounts. In addition, the Chairman will initiate a program whereby he is periodically apprised by staff that the Board is in compliance with DOT Travel Card Policy.

ACTION REQUIRED

The actions taken and planned by STB are responsive to our findings and recommendation. Therefore, we consider the recommendation closed, subject to follow-up requirements in DOT Order 8000.1C.

We appreciate the courtesies and cooperation afforded us by STB representatives during this audit. If you have any questions concerning this report, please call me at (202) 366-1992 or Ms. Robin K. Hunt, Deputy Assistant Inspector General for Hazardous Materials, Security and Special Programs, at (415) 744-3090.

#

cc: Director, Office of Economics, Environmental
Analysis and Administration, STB
Martin Gertel, M-1



Office of the Chairman

Surface Transportation Board
Washington, D.C. 20423-0001

To: Alexis M. Stefani
Principal Assistant Inspector General
for Auditing and Evaluation

Date: September 2nd, 2004

From: Roger Nober
Chairman

Subject: Draft Report on Management Controls for Administrative Activities at the
Surface Transportation Board

I have reviewed the draft report detailing the results of your recent audit of management controls for administrative activities at the Surface Transportation Board (STB). The review addressed a wide range of areas including leave administration, use of Government vehicles, purchase and travel cards, personal property, and emergency procedures and security at the STB.

Overall, this report found that the Board was in compliance with relevant rules, regulations, and procedures related to the activities examined. However, deficiencies were identified in two areas; controls for documenting unscheduled leave and one irregularity in the Board's travel card program. This memo is my response to those findings.

Your draft report on administrative activities found that the Board has appropriate mechanisms in place for documenting and tracking planned, scheduled leave. However, the review did cite a need for improved management controls for documenting unscheduled absences from work. Specifically, your evaluation found that, in many instances, it was left to the timekeepers to record absences of unscheduled leave and that some supervisors failed to consistently review the Sign-In and Out logs or Work Schedule Control Sheets.

Our current policy for unscheduled leave can be found in STB Administrative Issuance 7-505, Leave Administration, dated May 12, 2004. Section 5a(5)(a) states that in emergency situations, "...employees must notify their first-level supervisors, if available, or second-line supervisors by phone at the earliest possible time and indicate that they must take leave for an emergency or unanticipated personal need. When the employee returns to work, he/she will complete an OPM-71, have it approved, and give it to the timekeeper; or the employee will initial the Work Schedule Control Sheet for the leave which was taken."

I believe that strict adherence to our already-established policy will ensure that periods of unscheduled, unplanned leave are properly documented and tracked. Therefore, separate memoranda

will be issued to Office Directors and employees on this date, reminding them that:

- **All** periods of absence, even unplanned absences, must be approved by the supervisor.
- Upon an employee's return to work from an unscheduled absence, he/she must either (1) complete an OPM-71, Request for Leave or Approved Absence, have it approved and forward it to the timekeeper or (2) fill in the Work Schedule Control Sheet.
- When an employee finds that he/she needs to take unscheduled leave *after* arriving at work, the employee must either (1) complete the OPM-71 or (2) initial the Work Schedule Control Sheet, being sure to clearly document the time period covering the absence (e.g., "2:00pm - 4:30pm").

To facilitate consistency in the implementation of these procedures, also effective immediately, **all Offices** will be instructed to use a uniform Work Schedule Control Sheet (copy of memos to Office Directors and staff are attached). In addition, supervisors will be required to consistently review and ratify the Work Schedule Control Sheet for their respective organizations. Office Directors will be accountable for ensuring that the Work Schedule Control Sheets have the supervisors' ratifications.

The second issue identified during the IG's audit dealt with the travel card program. During the course of the audit, it was revealed that one employee was abusing his travel card privileges by charging items for personal use. By abusing his travel card privileges, the employee violated his account agreement with Citibank, DOT travel card policy, and Standards of Ethical Conduct for Employees in the Executive Branch. Upon identification of the travel card abuse, the STB immediately, in May 2004, reprimanded the employee (both orally and in writing) and cancelled his travel card privileges. These actions are in accordance with the STB's policy for disciplinary actions for delinquent and unauthorized use of the Government travel credit cards. In order to preclude abuses of travel cards in the future, we have been downloading the cardholder monthly activity reports since May 2004. The travel card program coordinator has been monitoring individual monthly cardholder activity reports for any unauthorized cardholder activity or delinquent accounts. The monitoring of the monthly reports together with the STB's policy for disciplinary actions for delinquent and unauthorized use of the credit cards has strengthened our oversight of the government issued travel cards. However, consistent with your recommendation, I will initiate a program where the Chairman is apprised by staff that the Board is in compliance with DOT Travel Card Policy on a periodic basis.

I am generally pleased with the results of the audit of the management controls for administrative activities at the Board. With the improvements in the two areas addressed in the OIG's findings, the STB is in compliance with the OIG recommendations.

I trust these administrative changes meet with your approval. If you have any questions or require additional information, please contact Leland Gardner, Director of the Office of Economics, Environmental Analysis and Administration, on 202-565-1532.

Attachments

CC: Vice Chairman Mulvey
Commissioner Buttrey

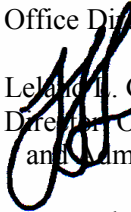
Appendix. Management Comments



Surface Transportation Board
Washington, D.C. 20423-0001

September 2, 2004

MEMORANDUM FOR: Office Directors, Branch Chiefs, and Section Chiefs

MEMORANDUM FROM:  Leland L. Gardner
Director, Office of Economics, Environmental Analysis
and Administration

SUBJECT: Improved Management Controls for Time and Attendance

A recent Office of Inspector General (OIG) review of the Board's Administrative Activities found that the Board has appropriate mechanisms in place for documenting and tracking planned, scheduled leave. However, the review did cite a need for improved management controls for documenting unscheduled absences from work. Specifically, their evaluation found that, in many instances, it was left to the timekeepers to record absences of unscheduled leave and that some supervisors failed to consistently review the Sign-In and Out logs or Work Schedule Control Sheets.

Our current policy for unscheduled leave can be found in STB Administrative Issuance 7-505, Leave Administration, dated May 12, 2004. Section 5a(5)(a) states that in emergency situations, "...employees must notify their first-level supervisors, if available, or second-line supervisors by phone at the earliest possible time and indicate that they must take leave for an emergency or unanticipated personal need. When the employee returns to work, he/she will complete an OPM-71, have it approved, and give it to the timekeeper; or the employee will initial the Work Schedule Control Sheet for the leave which was taken."

Adherence to our already-established policy will ensure that periods of unscheduled, unplanned leave are properly documented and tracked. Therefore, Board employees are reminded that:

- **All** periods of absence, even unplanned absences, must be approved by the supervisor. *There is no need to initially notify the timekeeper as the timekeeper is **not** the approving official for leave requests. Timekeeper notification can occur upon your return to work.*
- Upon your return to work from an unscheduled absence, you must either (1) complete an OPM-71, Request for Leave or Approved Absence, have it approved and forward it to the timekeeper or (2) fill in the Work Schedule Control Sheet.
- When you find you need to take unscheduled leave *after* you arrive at work, you must either (1) complete the OPM-71 or (2) initial the Work Schedule Control Sheet, being sure to clearly document the time period covering the absence (e.g., "2:00pm - 4:30pm").

Appendix. Management Comments

To facilitate consistency in the implementation of these procedures, effective immediately, **all Offices** are to use the attached Work Schedule Control Sheet. In addition, supervisors are to consistently review and ratify the Work Schedule Control Sheet for their respective organizations. Office Directors will be accountable for ensuring that the Work Schedule Control Sheets have the supervisors' ratifications.

If you have any questions, please contact Tony Jacobik or Joy Charles.

CC: Chairman Nober
Vice Chairman Mulvey
Commissioner Buttrey
Timekeepers



Surface Transportation Board
Washington, D.C. 20423-0001

September 2, 2004

MEMORANDUM FOR: All Employees

MEMORANDUM FROM:  Leland A. Gardner
Director, Office of Economics, Environmental Analysis
and Administration

SUBJECT: Improved Management Controls for Time and Attendance

A recent Office of Inspector General (OIG) review of the Board's Administrative Activities found that the Board has appropriate mechanisms in place for documenting and tracking planned, scheduled leave. However, the review did cite a need for improved management controls for documenting unscheduled absences from work. Specifically, their evaluation found that, in many instances, it was left to the timekeepers to record absences of unscheduled leave and that some supervisors failed to consistently review the Sign-In and Out logs or Work Schedule Control Sheets.

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- Upon your return to work from an unscheduled absence, you must either (1) complete an OPM-71, Request for Leave or Approved Absence, have it approved and forward it to the timekeeper or (2) fill in the Work Schedule Control Sheet.
- When you find you need to take unscheduled leave *after* you arrive at work, you must either (1) complete the OPM-71 or (2) initial the Work Schedule Control Sheet, being sure to clearly document the time period covering the absence (e.g., "2:00pm - 4:30pm").

Appendix. Management Comments

To facilitate consistency in the implementation of these procedures, effective immediately, **all Offices** are to use the new Work Schedule Control Sheet. In addition, supervisors are to consistently review and ratify the Work Schedule Control Sheet for their respective organizations. Office Directors will be accountable for ensuring that the Work Schedule Control Sheets have the supervisors' ratifications.

If you have any questions, please contact Tony Jacobik or Joy Charles.

