



June 9, 2022

Interim Chief Adrian Diaz
Seattle Police Department
PO Box 34986
Seattle, WA 98124-4986

Dear Chief Diaz:

Please see the below Management Action Recommendation.

Case Number

- 2021OPA-0437 / 2022COMP-0011

Topic

- Employee Timekeeping

Summary

- The Office or Inspector General (OIG) alleged the named employee (NE) worked overtime shifts on two days where he was scheduled to serve an unpaid suspension.

Analysis

- The OIG reviewed a sample of timecards while performing an audit and found the NE appeared to have worked nine hours of overtime while serving an unpaid suspension.
- OIG communication with SPD Traffic Unit indicated that there were “no controls to prevent this scenario.”
- [SPD Policy 4.020-POL-1\(7\)](#) states: “Employees on sick leave, military leave, disciplinary suspension, or limited duty will not work department overtime.”
- The NE is now separated from SPD, and the Department is unable to impose discipline for this policy violation.
- OPA has issued previous MARs regarding systemic gaps in SPD timekeeping policies under OPA cases [2020OPA-0511](#) (2021COMP-0030) and [2019OPA-0034](#) (2020COMP-0004).

Recommendation(s)

- 1) OPA reiterates its previous recommendation:
 - Move the current paper processes for recording employee overtime into a centralized database that can also track off-duty employment hours. Allocate responsibility of this database to the Seattle Police Operations Center.
 - In the absence of a centralized database, require SPD Human Resources to maintain records on employee work hours, overtime, off-duty employment, and furloughs, and flag employees who may be working excess hours.
 - Enable SPD supervisors to view all approved overtime hours for employees under their command.
 - Modify SPD Policy 4.020-POL-1(3):
 - Clearly define what qualifies under the public safety and mandatory overtime exceptions to the 90-hour rule.



- Measure a week from Wednesday to the following Wednesday to align with SPD's pay periods.
 - Reconcile any conflicts between CBAs and SPD policy. Negotiate any of the recommended changes above that are mandatory subjects of bargaining.
- 2) In conjunction with the previous recommendation:
- Require that the dates a disciplinary suspension will be served are submitted to the Seattle Police Operations Center.
 - Implement safeguards to prevent employees from coding overtime hours while disciplinary suspensions are served.

Thank you for your consideration of this matter. I look forward to your response.

Sincerely,

Gráinne Perkins

Gráinne Perkins
Interim Director, Office of Police Accountability