



Seattle Office of Police Accountability

September 20, 2024

Interim Chief Sue Rahr
Seattle Police Department
PO Box 34986
Seattle, WA 98124-4986

Dear Interim Chief Rahr:

Please see the below Management Action Recommendation.

Case Number

- 2023OPA-0523 / 2024COMP-0007

Topic

- Employee Timekeeping

Summary

A named employee exceeded the 90-hour-per-week work limit by more than 20 hours.

Analysis

- SPD Policy 4.020, POL-1 (3) states, “No employee may work more than 90 hours in one week, from 0300 hours on Saturday until 0300 hours the following Saturday.”¹
- The named employee worked at least one hundred eleven (111) hours in a single week. During his OPA interview, the named employee discussed regularly working ten-hour patrol shifts followed by nine-hour overtime shifts.
- OPA previously sustained an allegation against the named employee for violating work-hour restrictions nearly identically.² OPA has also issued two prior MARs concerning SPD’s timekeeping system issues, one of which is related to the named employee’s prior sustained case.³
- SPD’s overtime is tracked through two separate systems: (1) a Wednesday to Tuesday-based timesheet system linked to each bi-weekly pay period and (2) an overtime use report in Excel, which tracks overtime by pay period.
- The overtime use report may lag up to three weeks, making it difficult to track and verify whether officers comply with the overtime policy. The Seattle Fire Department successfully introduced the Orion Communications System for tracking overtime, but several issues prevented or delayed SPD from implementing it.⁴
- SPD recently implemented Workday for time reporting but has not articulated its impact on overtime tracking.⁵

¹ Seattle Police Department Policy Manual. Policy 4.020, POL 3. Effective: 05/21/2017.

² See 2020OPA-0511.

³ 2021COMP-0030; 2022COMP-0011

⁴ SPD’s response to 2020OPA-0511/2021COMP-0030.

⁵ SPD email on 8/13/2024 from Assistant Chief Underwood.



- OIG’s 2023 work plan noted, “the ability to reliably track and report on SPD employee hours, including the assignment and fulfillment of overtime hours, is crucial...Use of overtime and personnel management emerged as risk areas through the OIG [Sentinel Event Review] and discipline audit...”⁶
- OPA reviewed policies from a list of comparable cities. All have some form of overtime approval and tracking. Los Angeles requires supervisors to “counsel” employees after submitting an overtime report.⁷ Those discussions aim to help employees better track their overtime hours, stay within policy, and ensure officer wellness.

Recommendations

- SPD should consider developing an overtime tracking system that accurately monitors hours worked across SPD and enforce SPD Policy 4.020 POL-1 (3)’s requirement that “exceptions [to the 90-hour maximum] must be pre-approved.”
- SPD should consider including a supervisor counseling process to help monitor overtime.

I appreciate your consideration and look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Gino Betts, Jr.".

Gino Betts, Jr.
Director, Office of Police Accountability

⁷ Los Angeles Police Department. Policy Manual. Policy 708.02.