

INTRADEPARTMENTAL CORRESPONDENCE

March 18, 2014
14.2

TO: The Honorable Board of Police Commissioners

FROM: Chief of Police

SUBJECT: OPERATIONS – WEST BUREAU TIMEKEEPING INSPECTION
(IAID NO. 13-023)

RECOMMENDED ACTIONS

1. It is recommended that the Board of Police Commissioners REVIEW and APPROVE the attached Operations – West Bureau Timekeeping Inspection.
2. It is recommended that the Board of Police Commissioners REVIEW and APPROVE the attached Executive Summary thereto.

DISCUSSION

Internal Audits and Inspections Division conducted the Operations – West Bureau Timekeeping Inspection to evaluate compliance with related Department directives. The inspection included a review of the processes pertaining to the documentation and overall tracking of timekeeping for Department employees.

If additional information regarding this inspection is required, please contact Arif Alikhan, Special Assistant for Constitutional Policing, at (213) 486-8730.

Respectfully,



CHARLIE BECK
Chief of Police

Attachment

LOS ANGELES POLICE DEPARTMENT

*OPERATIONS – WEST BUREAU
TIMEKEEPING INSPECTION
(IAID NO. 13-023)*



CHARLIE BECK
Chief of Police

January 2014

EXECUTIVE SUMMARY
OPERATIONS-WEST BUREAU TIMEKEEPING INSPECTION
Conducted by Internal Audits and Inspections Division
Fiscal Year 2013/14

PURPOSE

In accordance with the Los Angeles Police Department's (Department) Fiscal Year 2013/14 Annual Audit and Inspection Plan, Internal Audits and Inspections Division (IAID) conducted an Operations-West Bureau (OWB) Timekeeping Inspection to assess timekeeping controls.

AUDIT SCOPE AND METHODOLOGY

Internal Audits and Inspections Division selected a stratified random sample of 79 employees from the OWB Sworn/Civilian Personnel Divisional Roster of 1735 employees.¹ Timekeeping records for Deployment Period No. 2 (January 27 to February 23, 2013) for each of the 79 employees were reviewed to determine proper maintenance, consistency in processing timekeeping information, proper overtime authorization, and compliance with a key Fair Labor Standards Act (FLSA) requirement in which civilian employees are required to take a lunch break, or accrue overtime.²

SUMMARY OF RESULTS

This inspection indicated that for the most part employee timekeeping records were properly maintained (i.e., Daily Field Activity Reports, Sergeant's Daily Reports, Watch Commander's Daily Reports, or Daily Sign in Sheets) to support the timekeeping information processed.

It also indicated, that 59 (75%) of 79 employees in the sample had one or more differences between timekeeping records and PaySR during DP No. 2, 2013. Additionally, this inspection indicated that 260 (94%) of the 276 reported overtime were properly approved. Lastly, IAID noted that 163 (94%) of the 174 entries for civilian employees' timekeeping records, indicated that a Code 7 was taken when required. There was no indication on the DSIS if Code 7 time was taken for the remaining 11 entries; corrections could have been made with proper supervisory review. The former would result in unpaid overtime, and would be an FLSA issue.

¹ A sample size of 64 employees was obtained using a one-tail test with a 95 percent confidence level and a five percent error rate. However, IAID judgmentally included 15 OWB primary timekeepers into the sample, resulting in a total of 79 employees being evaluated during this inspection.

² The FLSA is a United States Federal law enacted in 1938 that protects employees by setting certain workplace standards.

The objectives and findings for this inspection are reflected in the table below.

TABLE NO. 1 – INSPECTION OBJECTIVES AND SUMMARY OF RESULTS

Obj. No.	Objective	OSB		OCB		OVB		OWB	
		No. Meeting Standard	% Meeting Standard	No. Meeting Standard	% Meeting Standard	No. Meeting Standard	% Meeting Standard	No. Meeting Standard	% Meeting Standard
1	Maintenance of the Required Daily Timekeeping Records	995/1014	98%	1527/1604	95%	2616/2832	92%	2019/2040	99%
2	Consistency with Employee's Processed Time with Timekeeping Records	53/68	78%	63/75	84%	62/85	73%	59/79	75%
3	Reported Overtime Properly Approved	146/207	71%	328/334	98%	273/278	98%	260/276	94%
4	Civilian Employees' Compliance with Lunch Break Requirements	91/93	98%	180/210	86%	238/258	92%	163/174	94%
5	Patrol and Detective Incentives Paid in Accordance with Memorandum of Understanding	Not Tested		Not Tested		495/505	98%	418/458	91%

RECOMMENDATION

It is recommended that the Office of Operations reiterate throughout the Department, the Office of Operations Notice – UTILIZATION OF THE DAILY SIGN-IN SHEET, FORM 15.19.00, dated October 23, 2012. This Notice explains requirements for employees in assignments that do not utilize a Daily Field Activities Report, Form 15.52.00; Sergeant's Daily Report, Form 15.48.00; or Watch Commander's Daily Report, Form 15.80.00.

ACTIONS TAKEN

1. The inspection report and related findings were provided to each of the geographic Areas within OWB. Each of the respective geographic Areas generally agreed with the inspection report, indicating proactive steps had been to address the findings.
2. Wilshire Area advised they would cease the use of a rubber stamp on overtime reports.
3. The inspection report was presented to the Commanding Officer, Operations – West Bureau, and the Assistant to the Director, Office of Operations; both expressed general agreement with the inspection findings.

OPERATIONS - WEST BUREAU TIMEKEEPING INSPECTION
Conducted by Internal Audits and Inspections Division
Fourth Quarter, Fiscal Year 2013/14

PURPOSE

In accordance with the Los Angeles Police Department's (Department) Fiscal Year 2013/14 Annual Audit and Inspection Plan, Internal Audits and Inspections Division (IAID) conducted an Operations-West Bureau (OWB) Timekeeping Inspection to assess timekeeping controls.¹

Internal Audits and Inspections Division conducted this inspection under the guidance of generally accepted government auditing standards, specifically pertaining to performing the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the objectives. Internal Audits and Inspections Division has determined that the evidence obtained provides a reasonable basis for the findings and conclusions based on our objectives.

BACKGROUND

A considerable amount (96%) of the Department's \$1.2 billion budget is devoted to payroll expenses.² Timekeeping records (i.e., Daily Field Activities Reports [DFARs] Form 15.52, Sergeant's Daily Reports, Form 15.48, Watch Commander's Daily Reports Form 15.80, and Daily Sign-in Sheets [DSIS], Form 15.19) are the basis for payroll payments. Two systems are utilized for timekeeping and overtime processing. These systems are the Deployment Planning System (DPS), and the Online Overtime System (OLOTS). Specifically, DPS maintains planned and actual deployment of non-overtime hours. The Department's daily timekeeping is maintained on DPS. The OLOTS module in Payroll System Replacement (PaySR) maintains actual overtime hours. Any overtime hours worked are entered into the OLOTS module in PaySR separately from DPS. The PaySR is a citywide system that processes regular and overtime pay, and issues payroll checks. The PaySR is maintained and managed by the City Controller's Office.

The Department's timekeeping process begins with an approved deployment plan maintained in DPS. Actual work hours are captured on DFARs, Sergeant's Daily Reports, Watch Commander's Daily Reports, or DSIS. These timekeeping records are then utilized to update DPS if there are any variances between the planned work schedule and actual work schedule for employees. Generally, any updates to actual hours worked in DPS are made by Area/division timekeepers; however, Area watch commanders also update actual hours worked in DPS for sworn employees assigned to patrol functions. Any overtime hours worked are separately entered into OLOTS. Data from DPS is uploaded to PaySR and combined with information that is entered into OLOTS to process payroll checks. A Time-Sheet Correction Report, Form 2.30.00, is used to make corrections in DPS or OLOTS after the close of a pay period.

¹ Operations-West Bureau includes Hollywood Area, Wilshire Area, West Los Angeles Area, Pacific Area, Olympic Area, and West Traffic Division.

² Based on the Department's fiscal year 2012/13 budget.

PRIOR INSPECTIONS

Although this is the first OWB timekeeping inspection, this is the fourth timekeeping inspection IAID has conducted bureau-wide for the Department. The most recent timekeeping inspection was of Operations-Valley Bureau (OVB), which indicated the Department properly approved reported overtime. During the OVB Timekeeping Inspection, IAID could not determine whether 216 (8%) of 2,832 timekeeping entries were supported, as the timekeeping records (i.e. DFARs, Sergeant's Daily Reports, Watch Commander's Daily Reports, and DSIS) were unable to be located.

The inspections also determined that 23 (27%) of the 85 employees reviewed had one or more variations between records and PaySR for Deployment Period 11, 2012. Lastly, 238 (92%) of 258 required lunch breaks, civilian employees complied with lunch break requirements. Information on Operations-Central Bureau and Operations-South Bureau inspections are delineated in Table No. 1.

SCOPE AND METHODOLOGY

Internal Audits and Inspections Division selected a stratified random sample of 79 employees from the OWB Sworn/Civilian Personnel Divisional Roster of 1735 employees.³ Timekeeping records for DP No. 2 (January 27 to February 23, 2013) for each of the 79 employees were reviewed to determine proper maintenance, consistency in processing timekeeping information, proper overtime authorization, and compliance with a key Fair Labor Standards Act (FLSA) requirement in which civilian employees are required to take a lunch break, or accrue overtime.⁴

SUMMARY OF RESULTS

The objectives and results for this inspection are reflected in Table No. 1; included are Timekeeping Inspections of Operations-South Bureau, Operations-Central Bureau, and Operations-Valley Bureau.

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³ A sample size of 64 employees was obtained using a one-tail test with a 95 percent confidence level and a 5 percent error rate. However, IAID judgmentally included 15 OWB primary timekeepers into the sample, resulting in a total of 79 employees being evaluated during this inspection.

⁴ The FLSA is a United States Federal law enacted in 1938 that protects employees by setting certain workplace standards.

TABLE NO. 1 – INSPECTION OBJECTIVES AND SUMMARY OF RESULTS

Obj. No.	Objective	OSB		OCB		OVB		OWB	
		No. Meeting Standard	% Meeting Standard	No. Meeting Standard	% Meeting Standard	No. Meeting Standard	% Meeting Standard	No. Meeting Standard	% Meeting Standard
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5	Patrol and Detective Incentives Paid in Accordance with Memorandum of Understanding Criteria	Not Tested		Not Tested		495/505	98%	418/458	91%

For the most part, the inspection indicated employee timekeeping records were properly maintained (i.e., DFARs, Sergeant's Daily Reports, Watch Commander's Daily Reports, or DSIS) to support the timekeeping information processed.

It also indicated, that 59 (75%) of 79 employees in the sample had one or more differences between timekeeping records and PaySR during DP No. 2, 2013. Additionally, this inspection indicated that 260 (94%) of the 276 reported overtime reports were properly approved. Lastly, IAID noted that 163 (94%) of the 174 entries for civilian employees' timekeeping records indicated that a Code 7 was taken when required.⁵ There was no indication on the DSIS if Code 7 time was taken for the remaining 11 entries; corrections could have been made with proper supervisory review. The former would result in unpaid overtime, and a FLSA violation.

DETAILED FINDINGS

Objective No. 1 – Maintenance of the Required Daily Timekeeping Records

Criteria

Department Manual Section 3/705.05 – Daily Sign in Sheet - states, “*Department employees who are required to document the time of their Code Seven (meal time/free time), as well as their start and end-of-watch times on their divisional or section sign-in/sign-out sheet shall use the Daily Sign In Sheet. Department employees that currently use the Daily Sign Out Sheet and any other improvised sign-in/sign-out sheet shall cease to use these forms, and only use the Daily Sign In Sheet, Form 15.19. Employees who use any type of daily activities reports (e.g., Daily Field Activities Report, Form 15.52.00; Sergeant's Daily Report, Form 15.48.00; or Watch*

⁵ In law enforcement, “Code 7” refers to a 30-minute lunch break. Civilian employees are required to take and make note of their Code 7 in the DSIS.

Commander's Daily Report, Form 15.80.00) shall continue to use these forms and not use the Daily Sign In Sheet."

Procedures

Internal Audits and Inspections Division obtained copies of DFARs, DSIS, Sergeant's Daily Reports, Watch Commander's Daily Reports and other daily timekeeping records of the 79 sampled employees to ensure that each employee documented their start of watch, end of watch, and other employee activities as required.

Results

Internal Audits and Inspections Division was able to locate 2,019 (99%) of the 2,040 records/entries of timekeeping information needed to support timekeeping information processed for the 79 sampled employees; IAID was unable to locate 21 timekeeping records for eight employees. Of those dates, the employees were paid an accumulated total of 212 hours. Accordingly, the employees were paid without adequate documentation to support whether they worked on the indicated days.

TABLE NO. 2 – NUMBER OF DAYS WITHOUT ADEQUATE DOCUMENTATION

Division	No. of Employees	No. of Days
Hollywood	1	1
Wilshire	2	10
West Los Angeles	0	0
Pacific	1	5
Olympic	2	2
West Traffic Division	2	3
Operations-West Bureau	0	0
Total	8	21

Additionally, IAID identified three instances (Table No. 3), in which five employees used Compensated Time Off (CTO) in ten days, but Form 2.24, Overtime Reports could not be located, or were not submitted as required. Regarding Form 2.24, Overtime Reports for overtime worked, IAID identified two instances (Table No. 4), in which two employees worked overtime in two days, but Form 2.24, Overtime Reports could not be located, or were not submitted as required.⁶

⁶Administrative Order No. 20, dated September 3, 1999, states that employees shall generally report compensatory time off on an Overtime Report, Form 70-02.24.0, prior to their use of the time.

TABLE NO. 3 – MISSING CTO

Division	No. of Employees	No. of Days Affected
Wilshire Area	2	2
Pacific Area	2	3
West Traffic Division	1	5
Total	5	10

TABLE NO. 4 – MISSING OT

Division	No. of Employees	No. of Days Affected
Olympic Area	1	1
West Traffic Division	1	1
Total	2	2

Therefore, IAID was unable to verify the accuracy of time processed for seven sampled employees for the days reviewed in Objective No. 2.

Other Related Matter – “Front Desk” and “Kit Room” Assignment Timekeeping Records and Other Administrative Assignments.

The inspection determined that “front desk” and “kit room” officers do not sign-in and out as required by the administrative personnel in the Area. A sign in/out sheet should be implemented to ensure these employees account for their times as required.⁷

Objective No. 2 – Consistency with Employees’ Processed Time with Timekeeping Records⁸

Criteria

Department Manual Section 3/705.05 – Deployment Planning System User’s Responsibilities – states, “*Deployment Planning System Users or DPS Timekeepers shall be responsible for the following:*

- *Ensure that the Daily Sign In Sheet is accurate and made available prior to the start of each employee’s workday;*
- *Ensure that the Daily Sign In Sheet is prepared for each day of the deployment period; and,*
- *Ensure that the Daily Sign In Sheet is completed, filed and the information is transferred to the Daily Worksheet in the DPS, in a timely manner.”*

Upon validation of the DPS Data by the DPS User, the DPS data is uploaded into PaySR to process payroll checks.

Procedures

Internal Audits and Inspections Division compared the timekeeping records obtained above for the 79 employees to PaySR information for DP No. 2, 2013 to determine: 1) whether the number of hours each employee was paid, reconciled with timekeeping records, and; 2) whether the variation

⁷ Office of Operations issued Operations Order No. 12 dated October 8, 2013 amending Department Manual Section 3/705.05, *Daily Sign in Sheet*, to clarify the utilization of the Daily Sign-in Sheet.

⁸ Internal Audits and Inspections Division did not review the accuracy of the preparation of the other source documents such as DFAR or Sergeant’s Daily Reports. Such review is done by IAID separately in conjunction with various CAPA audits.

code of the hours paid (e.g., hours worked, sick time, vacation time, paid leave, etc.), reflected the employee's work status documented on timekeeping records.

Results

Fifty-nine (75%) of 79 sampled employees had their timekeeping records reconciled with PaySR for DP No. 2, 2012.⁹ For the remaining 20 employees, there were one or more unexplained variances between information documented in timekeeping records and information contained in the PaySR during DP No. 2, 2012. The attached Addenda A, provides a synopsis of the variances identified for each employee, and the resulting actions taken after the geographic Areas/divisions were notified of the variance by IAID.

Objective No. 3 – Reported Overtime Properly Approved

Criteria

Department Manual Section 3/708.02 specifies that *“No work may be done outside the employee's scheduled work hours unless approved in advance by his or her immediate supervisor.”*

In addition, completion of Form 2.24, Overtime Report, requires a signature of the supervisor approving the overtime and a signature of the Commanding Officer (CO) certifying the information therein is in compliance with the Los Angeles Administrative Code Section 4.169 – Overtime.

Procedures

Internal Audits and Inspections Division obtained and reviewed 279 Form 2.24, Overtime Reports submitted by the 79 sampled employees during DP No. 2, 2013, to determine whether the Form 2.24, Overtime Reports used for CTO and overtime worked, were reviewed and approved by both the responsible supervisor and the CO approval as evidenced by their respective signatures. In addition, IAID reviewed the Form 2.24, Overtime Reports, DFAR and/or DSIS to ensure that all overtime rendered and/or CTO taken was compensated or recorded in PaySR.

Results

Two hundred sixty (94%) of the 276 Form 2.24, Overtime Reports contained evidence of supervisory and CO approval. The remaining 16 Form 2.24, Overtime Reports, (one from Hollywood Area, six from Wilshire Area, and nine from Olympic Area) did not contain any evidence of supervisory review and approval.

In addition, there were nine employees who did not file a Form 2.24, Overtime Report, and were consequently not paid for overtime hours worked. Further details of the findings are documented in Addenda A.

⁹ As indicated in Objective No. 1, specific timekeeping records for indicated employees could not be located. Therefore, IAID was unable to determine whether variances existed between those records and PaySR.

Other Related Matters – Signature Stamp – Wilshire Area

During the inspection of the Form 2.24, Overtime Reports for Wilshire Area, IAID noted the Wilshire Area Commanding Officer adopted a procedure wherein the adjutant can stamp the CO's name on some transactions he had given prior approval, such as commendations, ratings, and approvals of Form 2.24, Overtime Reports. Although this procedure may be convenient and efficient, Fiscal Operations Division (FOD) indicated they have consistently advised commands to not utilize a stamp for approving Form 2.24, Overtime Reports, due in large part to the lack of internal controls.¹⁰

Objective No. 4 – Civilian Employees' Compliance with Lunch Break Requirements

Criteria

California Labor Code Section 512 (a) – states, *“An employer may not employ an employee for a work period of more than five hours per day without providing the employee with a meal period of not less than 30 minutes, except that if the total work period per day of the employee is no more than six hours, the meal period may be waived by mutual consent of both the employer and employee.”*

Department Manual Sections 3/705.05 – states, *“Department employees who are required to complete the DSIS shall accurately document their Code Seven in the “Activity” box including the “Out” and “In” times, if applicable.”*

Department Manual Section 3/708.02 – states, *“Employees who are required to take an unpaid Code Seven are required to properly log their Code Seven and to report their inability to take Code Seven as time worked.”*

Procedures

Of the 79 sampled employees, 13 were civilians. Internal Audits and Inspections Division reviewed all 174 days worked by the 13 civilian employees to determine if a Code-7 was documented in timekeeping records, and in instances wherein a Code-7 was not taken, whether the employee was paid overtime. If a Code-7 was not documented on a day when the employee worked a minimum of six hours, the Form 2.24, Overtime Report or the detail PaySR report was reviewed to ensure the employees received overtime compensation.

Results

One hundred sixty three (94%) of the 174 entries (representing 13 employees) in the timekeeping records indicated that a Code-7 was taken if required. For the remaining eleven entries, further details of the findings are documented in Addenda A.

¹⁰ See Actions Taken No. 2

Objective No. 5 - Patrol and Detective Incentives Paid in Accordance with Memorandum of Understanding Criteria

Article 5.4 of Memorandum of Understanding (MOU) No. 24, titled "Uniform Field Officer Incentive" states, *"A Uniform Field Officer Incentive of 3% (three percent) of regular salary (not pension based) shall be paid to each eligible officer."*

In addition, Article 5.5 of the MOU No. 24, titled "Detective Incentives" states, *"A Detective Incentive of 1% (one percent) of regular pay (not pension based) shall be paid to each eligible detective."*

Relevant to the above criteria is Article 5.9 of the MOU No. 24, titled "Temporary Higher Level Position" states, *"To assure the continuity of police services, employees from a lower civil service rank or lower paygrade position may be temporarily deployed to a position normally assigned to employees in a higher civil service rank or paygrade for a period of time not to exceed 168 consecutive calendar days (six DPs). The six DP limitation on assignment to a temporary higher level position may be extended on a case-by-case basis upon the express approval of the Employee Relations Administrator."*

Procedures

Internal Audits and Inspections Division selected a statistically significant stratified random sample of OWB 458 sworn employees from a population of 1,516 employees listed in the Uniform Field (Patrol Bonus) Officer Incentive, and Detective Incentive Reports. This report includes all the sworn employees receiving and not receiving incentives, and is distributed biweekly from FOD to the timekeeping personnel for each geographic Area. Timekeeping personnel are responsible for ensuring the list is reviewed and approved by supervisors and the Area CO to ensure its accuracy. Auditors interviewed FOD personnel to determine the process in which incentives are paid. Changes to compensation, including regular and incentives pay is facilitated through Personnel Division. Personnel Division receives the signed Uniform Field (Patrol Bonus) Officer Incentive and Detective Incentive Reports from each geographic Area. Personnel Division will make the appropriate changes in the payroll systems and FOD will process incentives based on the information contained in the payroll system. Internal Audits and Inspections Division obtained the internal assignment rosters prepared by each geographic Area and traced the 458 sworn employees to the roster to determine if the employees were, at that time, eligible for incentives. Auditors contacted various OWB personnel to confirm and inquire on current assignments and appointment dates to determine the extent of the over/under payment.

Lastly, IAID randomly selected four employees from the Uniform Field (Patrol Bonus) Officer Incentive and Detective Incentive Report for each Area or division that were not receiving incentives based on current assignments to verify if those employees were in fact not eligible for the field patrol or detective incentives.

Results

Four hundred eighteen (91%) of the 458 sworn employees met the standard for this objective. Of the remaining 40 employees, 11 were entitled to the three-percent patrol incentive and not receiving any incentive, eight were receiving the three-percent patrol incentive when not entitled to any incentive, 16 were receiving the three-percent patrol incentive when entitled to the one-percent detective incentive, and five were receiving the one-percent detective incentive and not receiving any incentive. The following table details the above findings by Area/division/bureau; the exceptions are listed in Addenda Item B.

**TABLE NO. 5 – SUMMARY OF PATROL AND DETECTIVE INCENTIVES
 OVERPAYMENT/UNDERPAYMENT**

Division	Not Receiving any Incentive, Entitled to 3% Patrol Incentive	Receiving 3% Patrol Incentive, Not Entitled to any Incentive	Receiving 3% Patrol Incentive, Entitled to 1% Detective Incentive	Receiving 1% Detective Incentive, Not Entitled to any Incentive	Total
Hollywood	8	1	-	-	9
Wilshire	3	1	2	-	6
West Los Angeles	-	2	3	-	5
Pacific	-	-	-	1	1
Olympic	-	-	-	-	-
West Traffic Division	-	1	-	-	1
Operations-West Bureau	-	3	11	4	18
Total	11	8	16	5	40

RECOMMENDATION

It is recommended that the Office of Operations reiterate throughout the Department, the Office of Operations Notice – UTILIZATION OF THE DAILY SIGN-IN SHEET, FORM 15.19.00, dated October 23, 2012. This Notice explains requirements for employees in assignments that do not utilize a Daily Field Activities Report, Form 15.52.00; Sergeant’s Daily Report, Form 15.48.00; or Watch Commander’s Daily Report, Form 15.80.00.

ACTIONS TAKEN

1. The inspection report and related findings were provided to each of the geographic Areas within OWB. Each of the respective geographic Areas generally agreed with the inspection report, indicating proactive steps had been to address the findings.
2. Wilshire Area advised they would cease the use of a rubber stamp on overtime reports.
3. The inspection report was presented to the Commanding Officer, Operations – West Bureau, and the Assistant to the Director, Office of Operations; both expressed general agreement with the inspection findings.