The Auditor of the City and County of Denver is independently elected by the citizens of Denver. He is responsible for examining and evaluating the operations of City agencies for the purpose of ensuring the proper and efficient use of City resources and providing other audit services and information to City Council, the Mayor and the public to improve all aspects of Denver’s government. He also chairs the City’s Audit Committee.

The Audit Committee is chaired by the Auditor and consists of seven members. The Audit Committee assists the Auditor in his oversight responsibilities of the integrity of the City’s finances and operations, including the integrity of the City’s financial statements. The Audit Committee is structured in a manner that ensures the independent oversight of City operations, thereby enhancing citizen confidence and avoiding any appearance of a conflict of interest.

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Report number: A2015-005
Mr. Robert White, Chief of Police
Denver Police Department
City and County of Denver

Dear Chief White:

Attached is the Auditor’s Office Audit Services Division’s report of the Police Administration – TeleStaff System Performance Audit. The audit focused on the Denver Police Department’s (DPD’s) ability to collect, analyze, and quantify the impacts of overtime work by DPD personnel. We looked to determine whether the Department’s time accounting system and practices were adequate for detecting non-compliance and for monitoring and managing officer time and workload. This audit also integrated with the Audit Services Division’s information technology auditors to assess the monitoring controls within the Department’s TeleStaff system.

The implementation of an electronic timekeeping system has provided DPD with sufficient data to monitor scheduled activities and hold officers accountable for following policy and procedures. We identified some additional areas that could further strengthen oversight, accountability, and the internal control environment at DPD. These recommendations include ensuring that TeleStaff user-password settings are changed on a regular schedule and requiring the Secondary Employment Unit to identify and inform Commanders of instances when officers did not receive prior approval within TeleStaff. Overall, we found that data stored in TeleStaff indicate that overtime and non-regular work hours performed in accordance with DPD policy limits have not impacted officers’ ability to perform their duty.

If you have any questions, please call Kip Memmott, Director of Audit Services, at 720-913-5000.

Sincerely,

Timothy M. O’Brien, C.P.A.
Auditor

cc: Honorable Michael Hancock, Mayor
    Honorable Members of City Council

To promote open, accountable, efficient and effective government by performing impartial reviews and other audit services that provide objective and useful information to improve decision making by management and the people.
We will monitor and report on recommendations and progress towards their implementation.
To promote open, accountable, efficient and effective government by performing impartial reviews and other audit services that provide objective and useful information to improve decision making by management and the people.

We will monitor and report on recommendations and progress towards their implementation.

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Ms. Janna Young, City Council Executive Staff Director
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AUDITOR’S REPORT

We have completed an audit of the Police Administration – TeleStaff System. The audit focused on the Denver Police Department’s (DPD’s) ability to collect, analyze, and quantify the impacts of overtime work by DPD personnel. We examined whether the Department’s time accounting system and practices were adequate for detecting non-compliance and for monitoring and managing officer time and workload. This audit integrated with the Audit Services Division’s information technology auditors to assess the monitoring controls within the Department’s TeleStaff system.

This performance audit is authorized pursuant to the City and County of Denver Charter, Article V, Part 2, Section 1, General Powers and Duties of Auditor, and was conducted in accordance with generally accepted government auditing standards. 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit found that TeleStaff has improved DPD’s ability to monitor officer hours by centralizing the data in an electronic database. In total, we offer four recommendations that we believe will further assist the Department in improving its oversight of officer scheduling. We extend our appreciation to the Denver Police Department and all personnel who assisted and cooperated with us during the audit.

Audit Services Division

Kip Memmott, MA, CGAP, CRMA
Director of Audit Services
Background
TeleStaff is a centralized electronic scheduling system that holds data on all uniformed police officers including work shifts, overtime hours, backfill hours, off-duty hours, and all related requests for time off. Officers can access TeleStaff at their assignment or via the web. Time entries for overtime, sick, compensatory time, and leave requests are entered, processed, and approved through TeleStaff. Officer violations of the daily and weekly limits set by DPD policy may result in suspension of secondary employment privileges or other reprimands.

Purpose
The purpose of the audit was to determine DPD’s ability to collect, analyze, and quantify the impacts of overtime work conducted by DPD personnel. We assessed whether the Department’s time accounting systems and practices were adequate for detecting non-compliance and for monitoring and managing officer time and workload.

Highlights
DPD has taken positive steps toward improving internal controls and oversight of officer scheduling by moving from a manual review process to a centralized electronic scheduling system known as TeleStaff, establishing related policies and procedures, and implementing frequent monitoring and review of off-duty work hours. We evaluated Information Technology General Controls (ITGC) implemented by DPD to ensure integrity and availability of the data and related systems. Effective ITGCs provide assurance that IT systems, applications, and data are confidential by limiting access to only authorized individuals; maintain integrity by guarding against unauthorized modification; and ensure that information and systems are available for use when the organization or users need them. We offer several recommendations to the Department to further strengthen some password and user controls within TeleStaff.

To ensure compliance with policy, off-duty work hours are reviewed on a weekly basis by DPD’s Secondary Employment Unit. Secondary employment is differentiated from regular work hours as voluntary hours worked by officers outside of the normal operations required by the Department. We found approximately 96 percent of officers complied with DPD policy limiting total hours an officer can work to sixteen hours in a twenty-four-hour period and sixty-four hours in one week.

Lastly, we analyzed all police work hours (i.e., regular shift, overtime, and off-duty/secondary employment) to determine if DPD’s policy limiting total hours is an effective measure to prevent negative health and behavioral outcomes. This was determined by reviewing the usage of sick leave and number of complaints filed against officers. Our analysis found DPD’s policy limiting total work hours seems appropriate to mitigate negative health and behavioral outcomes among officers.
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INTRODUCTION & BACKGROUND

The Denver Police Department

The Department of Safety consists of Police, Fire, Sheriff Departments, and other administrative support functions, which are overseen by the Executive Director of Safety. The Denver Police Department (DPD) is tasked with keeping the public safe through various crime prevention and crime reduction strategies, as well as through other initiatives that assist the Department in reaching its strategic goals. In 2014, DPD’s approved budget was approximately $208.7 million. There were approximately 1,748 employees, which encompasses nearly 1,434 sworn officers (permanent full-time uniformed). Our audit focused on DPD’s implementation and utilization of the TeleStaff work scheduling system.

TeleStaff System

DPD implemented the TeleStaff system in 2008. TeleStaff is a centralized, electronic time tracking system that holds data on all uniformed police officers, including training certifications, work shifts, overtime hours, backfill hours, off-duty hours, and all related requests for time off. In 2008 our office issued an audit of DPD’s Time Accounting Systems and Practices. During that audit we found that DPD had just implemented TeleStaff and the system was not part of the initial review. Since completing the full roll out in 2008, TeleStaff has improved DPD’s ability to monitor officer hours by centralizing the data in an electronic database.

Officers can access TeleStaff at their assignment or via the web. Time entries for overtime, sick, compensatory time, and leave requests are entered, processed, and approved through TeleStaff electronically. The TeleStaff system contains calendar functionality and allows for increased supervision. For example, all off-duty requests are made through TeleStaff and must be approved by a supervisor. It is the responsibility of the officer’s supervisor to monitor and ensure officers under their command are in compliance with all secondary employment policy and procedures. This includes ensuring proper approvals are obtained and that officers are not going over the established daily and weekly work hour limits. Consistent failure to obtain proper approval in TeleStaff or violations of the daily and weekly limits may result in suspension of secondary employment privileges or other reprimands.

3 An officer’s assignment refers to the position within the Department where the officer performs their job duty.
To assist with these administrative responsibilities, TeleStaff has several built-in controls for personnel time accounting and monitoring. For instance, the system prevents the scheduling of officers or third-party contractors who are not pre-approved for off-duty employment or contracts. In other cases, DPD officers are required to obtain specialized training for certain types of off-duty work, such as working undercover, in plain clothes, or at a liquor establishment. TeleStaff’s scheduling module automatically filters the list of available personnel to exclude uniformed personnel who have not completed the required training.

According to the DPD Collective Bargaining Agreement and DPD policy, officers vote on vacation time off for the next year during the last quarter of the preceding year, and voting is based on seniority in rank. Annual voting occurs in order to ensure proper planning, staffing levels, and coverage is met throughout the year. Once complete, this information is entered into TeleStaff.

For payroll purposes, an interface exists between TeleStaff and the City’s timekeeping system, Kronos. Once all information has been entered into TeleStaff the data is uploaded into Kronos. This data is then loaded into PeopleSoft to process payroll.

**DPD Secondary Employment Unit**

The Secondary Employment Unit serves as a liaison between DPD and employers seeking off-duty officers within the City and County of Denver. Off-duty, or secondary employment, is defined as any work, including self-employment, performed by an officer that is not part of their official assigned duties. Any officers employed to perform secondary employment work are bound by their police authority to enforce all laws. Further, officers must follow and are subject to all rules, regulations, and procedures of DPD while working off-duty. All secondary employers must complete an employment contract, which must be renewed annually. Officers are not authorized to work for an employer who has not completed and submitted a contract. Additionally, officers are prohibited from engaging in secondary employment at business locations, establishments, or venues where marijuana is sold or where consumption, production, testing, or transportation takes place. This includes security for the transportation of financial proceeds from such businesses. Finally, DPD maintains a list of employers, individuals, and locations where officers are prohibited from working off-duty.

Secondary Employment Unit personnel review all off-duty activity, which includes a weekly review to ensure officers are abiding by the Department’s Operations Manual, which states that officers should not work more than sixteen hours per day or more than

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5 Vacation voting is the process established by the Denver Police Department’s Collective Bargaining Agreement that allows officers to select their time off for the upcoming year, based on seniority in rank.
sixty-four hours per week of combined off-duty and on-duty hours, unless authorized by the Chief of Police. If officers are found to be in violation of off-duty policies, their Commander will be notified of the violation by an Internal Notice.⁶ Commanders review the violation and determine the appropriate penalty. Depending on the violation or if the officer has had previous violations, penalties may include documenting the violation with a Journal Entry; or by initiating an internal affairs (IA) investigation.⁷ If applicable, the Commander will forward a copy of the Internal Notice to the Secondary Employment Unit with a copy of the Journal Entry or IA case number for record keeping purposes.

Overtime Use at DPD

TeleStaff is also used to facilitate monitoring of overtime use by sworn officers and supervisors. As a public safety agency, DPD officers must be available twenty-four hours per day, seven days per week to meet the needs of the public. As a result, overtime is often an inherent element for ensuring appropriate shift and staff coverage.

In 2014, the DPD Finance Department (DPD Finance) projected that total payroll, including overtime and benefits, would be approximately $189.7 million. Specifically, DPD Finance estimated overtime would be approximately $10.9 million. As shown in Table 1, overtime is sub-categorized by DPD in the following manner:

<table>
<thead>
<tr>
<th>Subcategory</th>
<th>Budgeted</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Fund</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Department</td>
<td>$2,114,158</td>
<td>$3,251,398</td>
</tr>
<tr>
<td>Court</td>
<td>$421,126</td>
<td>$223,405</td>
</tr>
<tr>
<td>Department Events</td>
<td>$1,907,450</td>
<td>$1,446,554</td>
</tr>
<tr>
<td>Special Events</td>
<td>$371,690</td>
<td>$458,856</td>
</tr>
<tr>
<td>Sub Total</td>
<td>$4,760,423</td>
<td>$5,380,214</td>
</tr>
<tr>
<td>General Fund Revenue Generating</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Budgeted Billings for Services</td>
<td>$3,513,500</td>
<td>$4,623,854</td>
</tr>
<tr>
<td>Supplemental - Unbudgeted</td>
<td>-</td>
<td>$132,146</td>
</tr>
<tr>
<td>Sub Total</td>
<td>-</td>
<td>$4,756,000</td>
</tr>
<tr>
<td>Special Revenue Funds</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>-</td>
<td>$707,235</td>
</tr>
<tr>
<td>Total</td>
<td>$8,273,923</td>
<td>$10,843,449</td>
</tr>
</tbody>
</table>

Source: Auditors’ calculations using Denver Police Department finance data.

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⁶ Commanders are responsible for all aspects of operations, which include leading the team of Officers, Detectives, and Supervisors within their assigned Division.

⁷ The purpose of a Journal Entry is to record incidents of exceptional or below standard performance, including correctional actions taken.
• **General Department/Court Overtime**—Includes categories such as on-duty overtime, backfill, as well as homicide investigations, and being on-call.\(^8\) Overtime is also paid to officers when they are subpoenaed to attend and testify in court outside of their regular shift.

• **Department Events Overtime**—Includes prescheduled, routine activities such as patrolling Civic Center Park, securing parades, and focusing on neighborhoods like the historic Ballpark neighborhood.

• **Special Events Overtime**—Required for irregular, infrequent, or unforeseen events; such events included the Ferguson decision protests or municipal elections. This category includes overtime resulting from Critical Incident Training (CIT), other officer educational trainings, as well as extra community policing efforts.

• **General Fund Revenue Generating Overtime**—Defined as overtime which is reimbursed to DPD either through internal fund transfers for items such as Denver International Airport (DIA) curbside and backfill overtime; grant reimbursement from various state and federal agencies including the State of Colorado, Department of Justice, and Drug Enforcement Agency; or other special operations including the Metro Area Gang Task Force. Overtime is also reimbursed to the Department by the Colorado Rockies baseball team and Denver Broncos football team for security provided during home games.

• **Special Revenue Funds Overtime**—Defined as overtime reimbursed through grants for programs such as high visibility DUI (checkpoints), juvenile drug court, speed limit enforcement, pedestrian safety, and the High Intensity Drug Trafficking Area program.

In 2014, approximately 49 percent of total overtime expended was reimbursed to DPD by other agencies, grants, or third parties. Our audit did not focus on the billings and collection of DPD overtime.

**Court Overtime**

As part of our audit, we assessed the risk that overtime spent by officers in court may be excessive and that officers may have been subpoenaed to attend court on their scheduled days off. As shown in Table 2, TeleStaff data indicates police officer overtime for court appearances has cumulatively decreased by approximately 43 percent from 15,268 hours in 2009 to 8,719 hours in 2014. DPD and County Court personnel have partially credited this reduction to an interface built by DPD’s TeleStaff System Administrator in 2009. The interface sends daily files of the officer roster and days off to the Denver County Court Scheduling System to help the County Court not subpoena officers on their days off, when possible. On average, officers spent approximately two hours in court on each court visit.

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\(^8\) On-duty overtime is an extension of regularly scheduled shifts due to unforeseen circumstances. Backfill is a previously scheduled shift that must be filled if an officer is unable to work.
Table 2: Court Overtime, 2009 through 2014

<table>
<thead>
<tr>
<th>Year</th>
<th>Court Visits</th>
<th>Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>6,949</td>
<td>15,268</td>
</tr>
<tr>
<td>2010</td>
<td>5,620</td>
<td>12,595</td>
</tr>
<tr>
<td>2011</td>
<td>5,144</td>
<td>11,692</td>
</tr>
<tr>
<td>2012</td>
<td>4,804</td>
<td>10,769</td>
</tr>
<tr>
<td>2013</td>
<td>4,143</td>
<td>9,152</td>
</tr>
<tr>
<td>2014</td>
<td>3,889</td>
<td>8,719</td>
</tr>
<tr>
<td>Total</td>
<td>30,549</td>
<td>68,195</td>
</tr>
</tbody>
</table>

Source: Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

Denver County Court personnel also attributed the decline in court-related overtime hours to a reduction in the overall volume of cases during the same time period. This was likely due to staffing decreases and hiring freezes at DPD in prior years—resulting in the issuance of fewer traffic citations, as traffic citations account for about 60 percent of total court cases.
SCOPE

The audit assessed the internal controls over DPD’s TeleStaff System.

OBJECTIVE

The objective of the audit was to focus on DPD’s ability to collect, analyze, and quantify the impacts of overtime work by DPD personnel. We examined whether the Department’s time accounting system and practices were adequate for detecting non-compliance and for monitoring and managing officer time and workload. This audit integrated with the Audit Services Division’s information technology auditors to assess the monitoring controls within the Department’s TeleStaff system.

METHODOLOGY

The methodologies used in this audit to assess risks and to assist with developing and testing the audit objective included:

- Reviewing internal and external audits of TeleStaff within the City and from around the country
- Integrating fieldwork activates with the Audit Services Division’s information technology auditors to assist with an assessment of the monitoring controls utilized by DPD with regard to the implementation and utilization of the TeleStaff system
- Reviewing DPD’s Policy and Procedures Manual
- Reviewing DPD’s Secondary Employment Unit Policy and Procedures Manual
- Conducting various interviews with DPD personnel, including but not limited to Sergeants and Lieutenants responsible for off-duty oversight and approval
- Observing Secondary Employment Unit personnel conduct weekly audit of off-duty activity
- Judgmentally selecting and reviewing five off-duty activity reports
- Conducting various audit tests to ensure officers were not working more than sixteen hours per day or sixty-four hours per week unless authorized, ensuring prior approval was obtained before working an off-duty assignment, and ensuring individuals were not on Family Medical Leave Act leave while working an off-duty assignment
• Comparing off-duty jobs worked to active/approved employer list
• Reviewing and summarizing DPD Finance overtime analysis details, 2009-2014
• Analyzing officer-level data from the TeleStaff time keeping system and the Early Intervention Information System
• Reviewing 2014 City and County of Denver Payment Card Industry Report of Compliance to assess the physical access controls for the ‘gov’ domain data center that hosts the TeleStaff server
• Reviewing the Technology Services Network Administration Policy for user access and password management policies
• Reviewing the TeleStaff Configuration Guide for password and login configuration options
• Using available reporting tools including Active Directory User and Computers, Varonis DatAdvantage, and PeopleSoft to validate privileged access to TeleStaff
• Obtaining CommVault reporting for backup and restore and schedule for TeleStaff
FINDING

Oversight of Officer Scheduling Can Be Enhanced with Additional Monitoring and Expanded System Controls

The Denver Police Department (DPD) has taken positive steps toward improving internal controls and oversight of officer scheduling, which included moving in 2008 from a manual review process to a centralized electronic scheduling system known as TeleStaff, establishing related policies and procedures, and implementing frequent monitoring and review of off-duty work hours. We found that TeleStaff contains reliable data for monitoring and trend analysis and the system automatically flags when an officer has worked off-duty without prior approval. While we offer recommendations for strengthening system controls within TeleStaff, we found that DPD’s Secondary Employment Unit has used TeleStaff data to hold officers accountable to DPD’s policy regarding work hour restrictions of no more than sixteen hours per day or sixty-four hours per week. In addition to the review conducted by the Secondary Employment Unit, we analyzed all officer work hours stored in TeleStaff—encompassing officers’ regular, non-regular, and secondary employment work hours—to determine the impact, if any, on officers as they work more hours. Our analyses did not demonstrate a statistically significant relationship between officers who work more hours being negatively impacted in variables used to monitor their health or behavior.

TeleStaff Administrator Should Require Standard Password Changes or Implement Active Directory Authentication Controls

Information Technology General Controls (ITGC) are internal controls that apply to systems, processes, and data for an information technology environment. When auditing ITGCs auditors evaluate the controls that maintain the confidentiality, integrity, and availability of the processes, data, and systems. Effective ITGCs provide assurance that IT systems, applications, and data are confidential by limiting access to only authorized individuals; maintain integrity by guarding against unauthorized modification; and ensure that information and systems are available for use when the organization or users need them.

For the DPD TeleStaff system, a subset of ITGCs were selected for review including data center physical security controls, user account/password controls, privileged user access, and backup and restore functionality. Data center physical security controls include assessments of how access is controlled and monitored through the use of badge entry systems, and the use of visitor access policies for the denver.gov domain data centers. User account/password controls for TeleStaff were compared to the City’s Technology Services Network Administration Policy for key controls such as password lengths and complexity and frequency of password changes. Accounts with privileged access to the TeleStaff application and with access to the TeleStaff server were reviewed to ensure

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9 The Chief of Police can approve extensions to DPD’s work hour policy, when applicable.
that the access was appropriate. Finally, the backup schedules, policies, and logs for the TeleStaff server were reviewed to determine whether applications and databases have been backed up or copied to an alternate location. Backup schedules provide the ability to restore TeleStaff and ensure continuous availability of the application to DPD officers.

**TeleStaff Password Security Can Be Improved**

Our assessment of user/password security configuration found that password settings, including expiration, were not in full compliance with the Technology Services Network Administration Policy. This occurred because the TeleStaff application user account and password settings were in place when the current Administrator assumed the role. Additional password protection controls were not implemented after the handoff because officers must first login to the City’s network using their active directory account before accessing TeleStaff, which DPD believed provided some additional security. However, weak password controls have the potential to allow unauthorized access to TeleStaff, resulting in the ability to view or modify officers’ overtime and secondary job submissions. Accordingly, the TeleStaff administrator should implement stronger password control settings directly through TeleStaff or by using active directory authentication, an option which was included in the most recent version upgrade of TeleStaff completed in 2015.

**Roles and Responsibilities for TeleStaff Technical Support Should Be Formally Documented by DPD**

We also noted that although the TeleStaff Administrator has an administrative backup within DPD who can support the majority of the application duties, there are more technical aspects related to scripting and interfaces that are not covered. The current administrative backup does not have an information technology background or training to be proficient in all application support duties. Therefore, when the TeleStaff Administrator is unavailable, support duties are provided by Technology Services on an ad-hoc basis. Without a designated backup or backups for TeleStaff who can address the application’s interfaces and scripts, there could be a delay in resolving processing or other technical issues. To ensure proper coverage is available, the TeleStaff Administrator should fully document all aspects of TeleStaff support and ensure adequate backup for all aspects of the application are covered through collaboration with Technology Services or with additional DPD resources.

**TeleStaff Contains Sufficient Data for the Secondary Employment Unit and DPD Command To Monitor Officer Workload**

To ensure compliance with DPD policy, off-duty activity is reviewed on a weekly basis by Secondary Employment Unit personnel. Supervisors are responsible for pre-approving any time off requests. For example, if an officer works an off-duty assignment without pre-approval, he or she may face disciplinary action. We found the Secondary Employment Unit has not notified Commanders when pre-approvals were not granted. Without notification from the Secondary Employment Unit, supervisors may not be held
accountable for ensuring DPD polices are met, which includes pre-approving any time off requests within TeleStaff prior to an officer working the assignment.

**Our Assessment of TeleStaff Reviews Conducted by the Secondary Employment Unit Found Minimal Policy Violations**

The Secondary Employment Unit ensures that officers do not work more than sixteen hours in a twenty-four hour period or sixty-four hours of combined on-duty and off-duty work in a given week, unless additional work hours are authorized by the Chief of Police. Commanders are notified of any potential violation, which must be researched and addressed with the officer. If applicable, Commanders must provide an explanation to the Secondary Employment Unit as to the reason for the violation, including any disciplinary actions taken against the officer.

Officers’ immediate Supervisors, which include the rank of Sergeant or above, are responsible for monitoring secondary employment activities of their assigned officers. This typically includes reviewing and approving any off-duty requests and ensuring that officers are in compliance with policy.

We identified 138 instances within five separate weeks where officers did not receive prior approval in TeleStaff. However, these exceptions to policy only accounted for approximately 2 to 4 percent of all off-duty assignments processed during the weeks assessed.

**DPD Policy Requires Prior Approval of Off-Duty Requests**

Officers must obtain prior approval before working any off-duty assignment. According to the DPD Operations Manual, violations of off-duty policies may result in a suspension of the privilege in addition to formal disciplinary actions. For example, failure to obtain prior approval of an off-duty assignment from a Supervisor in the officer’s chain within TeleStaff may result in the following suspensions of off-duty work if a violation occurs within a twelve-month period:

- **1st Offense**: 60 days
- **2nd Offense**: 120 days
- **3rd Offense**: 360 days
- Subsequent violations may be dealt with by more severe sanctions

Verbal approval can occur at times when an officer or supervisor does not have immediate access to the TeleStaff system. Nevertheless, the request must be entered and approved in TeleStaff for tracking purposes once access to the system is available.
Secondary Employment Unit Personnel Should Notify Commanders When Preapproval Is Not Captured in TeleStaff

Despite the ability of TeleStaff to automatically identify instances where prior approvals were not obtained, the Secondary Employment Unit did not notify Commanders when such instances occurred. According to DPD personnel, in the early stages of TeleStaff implementation, Commanders were provided specific training on how to generate various TeleStaff reports that allowed them to view off-duty hours and unapproved work codes. However, based on our review, Sergeants and Lieutenants are typically responsible for reviewing and approving off-duty activities, and Commanders may not become aware of an issue until they are notified, despite having the ability to review and pull various TeleStaff reports themselves.

As such, Commanders may not be aware of on-going issues related to off-duty approvals, which may lead to unnecessary violations and potential disciplinary actions, when lower-level administrative actions might be more prudent, such as verbal coaching or additional training and reminders of policy and compliance procedures. Therefore, the Secondary Employment Unit should identify and report to Commanders on a weekly, monthly, or quarterly basis instances where off-duty approvals were not obtained in TeleStaff prior to the officer working the off-duty assignment. Commanders should develop and provide an action plan in response to the Secondary Employment Unit to address instances of unapproved off-duty hours, when necessary. This will ensure officers and their supervisors are held accountable to complying with DPD’s off-duty policies, identify potential training opportunities, and may help reduce unnecessary administrative violations. Consistent monitoring of secondary employment hours is important since this type of work has increased each year since 2009.

Secondary Employment Hours Have Increased

Secondary employment is differentiated from regular work hours as voluntary hours worked by officers outside the normal operations of DPD. DPD Finance defines secondary employment hours as either paid through DPD payroll (via third-party agreements and grants) or not paid through DPD payroll (third-party businesses, such as bars, restaurants, and convenience stores), whereby officers were paid directly by the contracting entity. Tables 3 and 4 provide a summary of secondary employment, paid and not paid, for 2009 through 2014.

As shown in Table 3, secondary employment paid by DPD increased 64 percent as work hours in this area grew from 21,907 in 2009 to 35,846 in 2014, with each occurrence averaging approximately six hours.
Table 3: Secondary Employment Paid by DPD, 2009 through 2014

<table>
<thead>
<tr>
<th>Year</th>
<th>Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>21,907</td>
</tr>
<tr>
<td>2010</td>
<td>25,100</td>
</tr>
<tr>
<td>2011</td>
<td>29,272</td>
</tr>
<tr>
<td>2012</td>
<td>31,621</td>
</tr>
<tr>
<td>2013</td>
<td>34,277</td>
</tr>
<tr>
<td>2014</td>
<td>35,846</td>
</tr>
<tr>
<td>Total</td>
<td>178,023</td>
</tr>
</tbody>
</table>

Source: Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

Table 4 shows that secondary employment not paid through DPD payroll increased 21 percent as work hours grew from 213,289 in 2009 to 258,726 in 2014, with each occurrence averaging approximately five hours.

Table 4: Secondary Employment Not Paid by DPD, 2009 through 2014

<table>
<thead>
<tr>
<th>Year</th>
<th>Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>213,289</td>
</tr>
<tr>
<td>2010</td>
<td>239,130</td>
</tr>
<tr>
<td>2011</td>
<td>243,619</td>
</tr>
<tr>
<td>2012</td>
<td>230,924</td>
</tr>
<tr>
<td>2013</td>
<td>247,708</td>
</tr>
<tr>
<td>2014</td>
<td>258,726</td>
</tr>
<tr>
<td>Total</td>
<td>1,433,395</td>
</tr>
</tbody>
</table>

Source: Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

We Conducted Additional Analysis on Police Work Hours To Determine Whether Officers Who Work More Hours Are Negatively Impacted

The purpose of analyzing all police scheduling data in TeleStaff (i.e., regular shift, overtime, and off-duty hours) was to determine whether DPD’s policy limiting how many total hours an officer can work to sixteen hours in a twenty-four-hour period and sixty-four hours in any given week is an effective measure to prevent negative health and behavioral outcomes—assessed by reviewing the usage of sick leave and number of complaints filed against officers. We found that TeleStaff houses quality data that can be
used for monitoring and trend analysis purposes. Additionally, it appears that Command personnel have sufficient data to monitor officer workloads and welfare. For instance, our analysis of police scheduling data found that DPD’s policy of limiting total work hours seems appropriate to mitigate negative health and behavioral outcomes among officers. Overall, we determined:

- In 2014, on average, approximately 5 percent of all uniformed police officers worked more than sixty-four hours in any given week.
- The number of non-regular hours worked by officers, up to DPD’s policy limit of sixty-four hours, does not appear to impact the amount of sick leave used.
- The number of non-regular hours worked by officers, up to DPD’s policy limit, does not appear to have a negative impact on overall officer behavior.

A detailed analysis of our findings in these three areas is described below.

**The Average Police Officer Works Almost Seven Hours of Combined Off-Duty and Overtime per Week**—In 2014, the average police officer worked 32.7 hours in terms of regularly scheduled shifts, 4.2 hours of off-duty work, and 2.5 hours of overtime. As shown in Figure 1, in 2009, the average officer worked 286 hours of overtime and off-duty annually compared to 360 hours in 2014.

Figure 1: Average Annual Hours of Non-Regular Worked Per Officer, 2009 through 2014

As also shown in Figure 1, the average officer took between 108 hours and 155 hours of sick leave—for simplification of analysis, sick leave includes sick leave, accrued sick leave, Family Medical Leave Act (FMLA) leave, and leave of duty—annually between 2009 through 2014. Figure 1 also presents the average number of hours officers are reprimanded. As shown, the average number of reprimand hours (i.e., fined,

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10 All averages were calculated using total weekly or monthly hours as the numerator and effective officers as the denominator. Effective officers were defined as any officer who worked more than zero hours of regular time.
administrative leave, or leave without pay) has been declining from fifteen hours per officer in 2011 to a low of nine hours in 2014.

To assess the impact that decreasing staff levels have had on workload, the average number of 911 calls effective officers responded to and the average number of self-initiated policing actions per effective officer are provided in Figure 2 for 2009 through 2014.

Figure 2: Annual Average Workload Per Officer, 2009 through 2014

Source: Auditors’ calculations using Early Intervention Information System 2009 through 2014 monthly dataset.

Note: Self-initiated actions, otherwise known as Class 2 actions, occur when a police officer stops an individual suspected of having committed a crime or questions an individual about neighborhood safety.

As shown in Figure 2, the annual average number of 911 calls to which officers are responsible for responding has remained relatively constant over the years, ranging from a low of 454 to a high of 496. Meanwhile, the number of self-initiated police actions has increased. In 2009, the average effective officer made 172 self-initiated actions. In comparison, the average effective officer made 242 self-initiated actions in 2014.

Approximately 5 Percent Of All Uniformed Police Officers Worked More Than 64 Hours in Any Given Week—In 2014, approximately 5 percent of all officers worked more than 64 hours in terms of regularly scheduled shifts, overtime, and off-duty. On average, this breaks out to 65 officers per week worked more than 64 hours. While more than 5 percent of officers exceeded the 64-hour weekly work limit, even fewer work more than 70 hours per week. On average, less than 3 percent of all officers worked more than 70 hours in any given week during 2014. Of all the incidences where an officer worked more than 70 hours, nearly 53 percent involved officers who are considered Command Staff, such as officers who have ranks of Lieutenant, Captain, Commander, and Deputy Chief or Chief. Due to their role as supervisors and their increased responsibilities in the Department, the additional hours worked by higher ranks is reasonably expected. Additionally, due to special events, the Chief of Police can authorize officers to work more than 64 hours in one week. In 2014, the Chief of Police formally granted weekly overtime extensions 8 times.
The Number of Non-Regular Hours Worked by Officers Does Not Appear To Have an Impact on the Amount of Sick Leave Used—One of the research questions our audit hoped to determine was whether an increased number of non-regular work hours has an impact on the number of sick leave (i.e., sick leave, accrued sick leave, FMLA leave, and leave of duty) hours officers took. To answer this question, an analysis of both Department-wide and individual officers was performed. Both analyses suggest that the number of non-regular work hours an officer works does not have an impact on the amount of sick leave used.

First, Department-wide, the total monthly non-regular hours and sick leave hours were graphed to show the relationship between the two variables. As shown in Figure 3, there is no relationship between total monthly non-regular hours worked by all officers and total monthly sick leave taken.

**Figure 3: Relationship between Total Monthly Non-Regular Hours Worked and Total Monthly Sick Leave Taken, 2009 through 2014**

![Graph showing relationship between total monthly non-regular hours worked and total monthly sick leave taken, 2009 through 2014]

**Source:** Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

**Note 1:** Pearson Correlation Coefficient = -0.10. Correlation coefficients range from 1 to -1. The closer the number is to 1 or -1, the stronger the correlation.

**Note 2:** Sick Leave = FMLA Leave, Leave of Duty, Sick Leave, and Accrued Sick Leave. Non-Regular Hours = Off-Duty, Overtime, and Backfill.

While there is no correlation between the total monthly non-regular hours worked by all officers and the total monthly sick leave hours taken, the correlation coefficient is negative. This suggests a potential relationship between the two variables where as the total non-regular hours worked increases, the total amount of sick leave decreases. This is most likely attributable to younger and healthier officers being the ones to work more non-regular hours. For instance, according to the 2009 through 2014 monthly TeleStaff dataset, the average age of officers working non-regular hours was forty-six. In
comparison, the average age of officers who do not work non-regular hours was forty-eight.\textsuperscript{11}

By individual officer, it also does not appear that officers working non-regular hours take more sick leave than those who do not work non-regular hours, or that officers taking sick leave work more non-regular hours to make-up time and pay. Figure 4 provides the average monthly non-regular hours worked by officer’s sick leave status.

**Figure 4: Average Monthly Non-Regular Hours Worked by Sick Leave Status, 2009 through 2014**

As shown in Figure 4, officers who did not take sick leave worked an average of nearly twenty-five hours of overtime and off-duty. In comparison, officers who did use sick leave worked an average of nearly twenty hours of overtime and off-duty.

We also compared the average monthly sick leave taken based on whether an officer worked non-regular hours or did not work non-regular hours in any given month. We found that officers who did not work non-regular hours took almost sixteen hours of sick leave. In comparison, officers who worked non-regular hours took nearly three hours of sick leave.

**The Number of Non-Regular Hours Worked by Officers Does Not Appear To Have a Negative Impact on Officer Behavior**—To determine whether working non-regular hours has a negative impact on officer behavior, our audit measured the impact increasing total work hours has on officer behavior in three different areas:

- Number of hours an officer is fined for violating DPD policies

\textsuperscript{11} P-value is the number which represents statistical significance. A p-value equal to or less than 0.05 indicates statistical significance. The difference reflected in the Figure is statistically significant (p-value 0.00).
- Number of times an officer uses force or discharges a weapon
- Number of complaints, both internally driven or lodged by the public

At the Department-wide level, the total monthly non-Regular hours worked by all officers were aggregated along with the total monthly reprimand hours officers were assigned. For the purposes of this analysis, reprimand hours are the sum of fined time, administrative leave, and leave without pay. Figure 5 shows the relationship between total monthly non-regular work hours and total monthly reprimand hours.

**Figure 5: Relationship between Total Monthly Non-Regular Hours Worked and Total Monthly Reprimand Hours, 2009 through 2014**

![Graph showing the relationship between total monthly non-regular hours worked and total monthly reprimand hours.](image)

**Source:** Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

**Note 1:** Pearson Correlation Coefficient = -0.28. Correlation coefficients range from 1 to -1. The closer the number is to 1 or -1 the stronger the correlation.

**Note 2:** Reprimand Hours = Administrative Leave, Leave without Pay, Fined Time. Non-Regular Hours = Off-Duty, Overtime, and Backfill.

As shown in Figure 5, there is a moderate correlation between the number of non-regular hours worked and the number of reprimand hours served. While the correlation is moderate, it is encouraging that the relationship is negative, which implies that more non-regular hours worked by officers actually results in fewer reprimand hours served. This can be interpreted as an indicator that officers with fewer reprimands are likely to be working more non-regular hours than officers with higher reprimands.

At the officer level, similar evidence can be found. Officers who are served reprimand hours work only half the number of non-regular hours as officers who are not served reprimands. The data further indicate that officers who work non-regular hours are served a fraction of the reprimand hours as those who do not work non-regular hours. This provides evidence that officers who are less likely to be reprimanded are more likely to work non-regular hours than officers who are more likely to be reprimanded. Figure 6 provides a breakdown of average monthly non-regular work hours by reprimand status.
**Figure 6:** Average Monthly Non-Regular Hours Worked by Reprimand Status, 2009 through 2014

**Source:** Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

**Note:** P-value is the number which represents statistical significance. A p-value equal to or less than 0.05 indicates statistical significance. The differences between the average monthly non-regular work hours by whether an officer was reprimanded or not is statistically significant (p-value = 0.00).

As shown in Figure 6, the average number of non-regular hours worked by officers who were not served with reprimand hours was twenty-four hours per month over the course of 2009 through 2014. In comparison, officers who were served with reprimand hours worked nearly thirteen hours of non-regular hours per month during the same time period.

We also analyzed how many reprimand hours officers are served based on whether they worked non-regular hours or not. We found that, on average, officers who did not work non-regular hours were served a little more than ten reprimand hours per month.

In addition, utilizing use of force and weapon discharges as another measure of officer behavior, our analysis found that there does not seem to be a relationship between the total number of non-regular hours worked by officers and the total number of use of force and weapon discharges. Figure 7 presents the relationship between these two variables.
**Figure 7:** Relationship between Total Monthly Non-Regular Hours Worked and Total Monthly Uses of Force and Weapon Discharges, 2009 through 2014

Source: Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

**Note 1:** Pearson Correlation Coefficient = -0.01.

**Note 2:** Non-Regular Hours = Off-Duty, Overtime, and Backfill.

**Note 3:** 2012 use of force and weapon discharge data was not available due to Denver Police Department Internal Affairs Bureau transitioning from the prior case management system to the currently used IAPRO case management system.

As shown in Figure 7, the relationship between total monthly non-regular hours worked and total monthly use of force and weapon discharge incidents is essentially non-existent. This is potential evidence that officers who work non-regular hours, particularly off-duty hours, are not necessarily exposed to situations that may lead them to use force or discharge a weapon more often. This analysis also suggests that officers who work non-regular hours are not exposed to more stress that makes them more likely to use force or discharge a weapon.

At the individual officer level, it also appears that working non-regular hours has minimal impact on officer behavior. Figure 8 provides the average monthly non-regular hours worked by force or weapon usage.
Figure 8: Average Monthly Non-Regular Hours Worked by Force or Weapon Usage, 2009 through 2014

Source: Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

Note 1: 2012 use of force and weapon discharge data was not available due to Denver Police Department Internal Affairs Bureau transitioning from the prior case management system to the currently used IAPRO case management system.

Note 2: P-value is the number which represents statistical significance. A p-value equal to or less than 0.05 indicates statistical significance. The differences between the average monthly non-regular work hours by whether an officer used force or discharged a weapon or not is statistically significant (p-value = 0.00).

As shown in Figure 8, based on use of force and weapon discharge status, officers who discharge their weapons or use force work on average nearly fifteen hours of off-duty and backfill. In comparison, officers who do not discharge their weapon or use force do not work anymore or any less non-regular hours than officers who do not use force, working on average nearly seventeen hours of off-duty and backfill.

Our analysis also found that the average number of times officers use force or discharge their weapon whether they worked off-duty or backfill compared to whether they did not work off-duty or backfill was minimal. Specifically, on average, officers will use force or discharge their weapon approximately once every nine years.

The third and final way officer behavior was measured was by reviewing complaints lodged against officers. The Department-wide analysis of non-regular work hours and complaints suggests there is not a relationship between the total number of non-regular hours worked by officers and the total number of use of force and weapon discharges. Figure 9 presents the relationship between these two variables Department-wide.
Figure 9: Relationship between Total Monthly Non-Regular Hours Worked and Total Monthly Incidents of Complaints, 2009 through 2014

Source: Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset.

Note 1: Pearson Correlation Coefficient = -0.08. Correlation coefficients range from 1 to -1. The closer the number is to 1 or -1 the stronger the correlation.

Note 2: Non-Regular Hours = Off-Duty, Overtime, and Backfill.

Note 3: 2012 use of force and weapon discharge data was not available due to Denver Police Department Internal Affairs Bureau transitioning from the prior case management system to the currently used IAPRO case management system.

As shown in Figure 9, there is no relationship between the number of non-regular hours worked and the number of complaints lodged against an officer in any given month. While working more hours increases instances for issues to arise, officers are not violating policies and procedures or acting inappropriately as measured by the number of complaints lodged.

Specifically, at the individual officer level, it appears that officers who work non-regular hours are not more likely to receive complaints compared to those who do not. While the data suggests that when an officer receives a complaint they have been working more non-regular hours, this is likely due to the increased public interactions or opportunities for the public to view actions they deem inappropriate rather than officer behavior directly attributed to an increased workload.

Figure 10 provides the average monthly non-regular hours worked by officers who received or did not receive a complaint.
Figure 10: Average Monthly Non-Regular Hours Worked by Monthly Complaint Status, 2009 through 2014

Source: Auditors’ calculations using TeleStaff 2009 through 2014 monthly dataset and Early Intervention Information System 2009 through 2014 monthly dataset.

Note 1: 2012 use of force and weapon discharge data was not available due to Denver Police Department Internal Affairs Bureau transitioning from the prior case management system to the currently used IAPRO case management system.

Note 2: P-value is the number which represents statistical significance. A p-value equal to or less than 0.05 indicates statistical significance. The differences between the average monthly non-regular work hours by whether an officer received a complaint or not is statistically significant (p-value = 0.00).

As shown in Figure 10, officers who received a complaint worked an average of twenty-seven non-regular hours. In comparison, those who did not receive a complaint worked an average of nearly twenty-four non-regular hours. While the difference is statistically significant, the difference is only a 10-percent variation. This seems like a small and acceptable gap when considering the following: more work hours allow for increased opportunities for officers to interact with the public or act in a manner that the public may perceive each month; that the total percentage of officers who have had complaints lodged against them from 2009 through 2014 is roughly 6 percent (or approximately 77 officers); and that department-wide there is no relationship between non-regular hours and number of complaints.
Lastly, we analyzed the number of complaints officers receive on average per month based on whether they worked or did not work non-regular hours. Our analysis showed that officers who did not work non-regular hours received the same number of complaints. This suggests that officers who work or do not work non-regular hours both receive, on average, only one complaint per year. Taking this into account somewhat negates the idea that officers who receive complaints work more non-regular hours than officers who do not receive complaints.

In summary, the TeleStaff system has provided DPD with sufficient data to monitor officer work hours in a centralized, electronic application. Furthermore, our analyses suggest that DPD’s current work hour limitations of sixteen and sixty-four hours appear appropriate. Therefore, in collaboration with the Data Analysis Unit, DPD should revisit and analyze the impact of overtime and off-duty work on officer health and behavior as significant changes to officer work hours, schedules, or effective strength are introduced. In total, we offer four recommendations to assist the Department in improving internal and system controls related to the administration and management of data available within TeleStaff.
RECOMMENDATIONS

We offer the following recommendations to assist the Denver Police Department in improving operations.

1.1 TeleStaff Password Controls – The Denver Police Department should implement stronger password control settings through TeleStaff application security or active directory authentication, an option which was included in the most recent version upgrade of TeleStaff.

1.2 TeleStaff Administrator – The Denver Police Department should fully document all aspects of TeleStaff support and ensure adequate backup for all aspects of the application through a collaboration with Technology Services or with additional DPD resources.

1.3 Secondary Employment Unit – The Denver Police Department should identify and report to Commanders on a weekly, monthly, or quarterly basis instances where off-duty approvals were not obtained in TeleStaff prior to the officer working the off-duty assignment. Commanders should develop and provide an action plan in response to the Secondary Employment Unit to address instances of unapproved off-duty, when necessary.

1.4 Data Analysis Unit – The Denver Police Department should revisit and analyze the impact of overtime and off-duty work on officer health and behavior as significant changes to officer work hours, schedules, or effective strength are introduced.
July 29, 2015

Mr. Kip R. Memmott, MA, CGAP, CRMA  
Director of Audit Services  
Office of the Auditor  
City and County of Denver  
201 West Colfax Avenue, Dept. 705  
Denver, Colorado 80202

Dear Mr. Memmott:

The Office of the Auditor has conducted a performance audit of Police Administration – TeleStaff System.

This memorandum provides a written response for each reportable condition noted in the Auditor’s Report final draft that was sent to us on July, 13, 2015. This response complies with Section 20-276 (c) of the Denver Revised Municipal Code (D.R.M.C.).

AUDIT FINDING 1
Oversight of Officer Scheduling Can Be Enhanced with Additional Monitoring and Expanded System Controls

RECOMMENDATION 1.1
TeleStaff Password Controls – The Denver Police Department should implement stronger password control settings through TeleStaff application security or active directory authentication, an option which was included in the most recent version upgrade of TeleStaff.

<table>
<thead>
<tr>
<th>Agree or Disagree with Recommendation</th>
<th>Target date to complete implementation activities (Generally expected within 60 to 90 days)</th>
<th>Name and phone number of specific point of contact for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agree</td>
<td>Complete</td>
<td>Matthew Murray</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 1.1
The Denver Police Department Senior ERP Systems Analyst, Mike Gunnare, modified TeleStaff to require a password change every 90 days effective July 17, 2015. This was done through TeleStaff application Security because currently active directory authentication does not work with Web Staff.
RECOMMENDATION 1.2
**TeleStaff Administrator** – The Denver Police Department should fully document all aspects of TeleStaff support and ensure adequate backup for all aspects of the application through a collaboration with Technology Services or with additional DPD resources.

<table>
<thead>
<tr>
<th>Agree or Disagree with Recommendation</th>
<th>Target date to complete implementation activities (Generally expected within 60 to 90 days)</th>
<th>Name and phone number of specific point of contact for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agree</td>
<td>Complete</td>
<td>Matthew Murray</td>
</tr>
</tbody>
</table>

**Narrative for Recommendation 1.2**
There is an upgrade to TeleStaff in progress and Technology Services has dedicated one developer to the project. That TS person is the recommended collaboration between TS and DPD to ensure adequate backup to keep the TeleStaff system operational.

Additionally, there is a plan moving forward in 2016 to bring the Denver Sheriff Department into TeleStaff so that all three Safety Agencies utilize TeleStaff as their scheduling system. That will bring on one additional FTE to assist the Senior ERP Systems Analyst while still ensuring each agency has at least one TeleStaff specialist on staff.

RECOMMENDATION 1.3
**Secondary Employment Unit** – The Denver Police Department should identify and report to Commanders on a weekly, monthly, or quarterly basis instances where off-duty approvals were not obtained in TeleStaff prior to the officer working the off-duty assignment. Commanders should develop and provide an action plan in response to the Secondary Employment Unit to address instances of unapproved off-duty, when necessary.

<table>
<thead>
<tr>
<th>Agree or Disagree with Recommendation</th>
<th>Target date to complete implementation activities (Generally expected within 60 to 90 days)</th>
<th>Name and phone number of specific point of contact for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agree</td>
<td>August 3, 2015</td>
<td>Matthew Murray</td>
</tr>
</tbody>
</table>

**Narrative for Recommendation 1.3**
The recommended notification to commanders indicating when off-duty approvals were not obtained in TeleStaff prior to the officer working the off-duty shift will become part of the new weekly off duty hours audit report effective August 3, 2015. Commanders will review the information and insure the policy is explained to the officer as a training remediation. If an officer becomes a flagrant offender, and the commander deems it necessary, the corrective action will escalate to a Performance Evaluation journal entry or an Informal IAB case.
RECOMMENDATION 1.4
Data Analysis Unit – The Denver Police Department should revisit and analyze the impact of overtime and off-duty work on officer health and behavior as significant changes to officer work hours, schedules, or effective strength are introduced.

<table>
<thead>
<tr>
<th>Agree or Disagree with Recommendation</th>
<th>Target date to complete implementation activities (Generally expected within 60 to 90 days)</th>
<th>Name and phone number of specific point of contact for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agree</td>
<td>Not Applicable</td>
<td>Matthew Murray</td>
</tr>
<tr>
<td>(No completion date as it will depend on IF a significant change is planned)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Narrative for Recommendation 1.4
If and when significant changes to officer work hours, schedules or overtime occur, the Chief may request an analysis of the impact. The police department has done work hour impact analysis in the past. Additionally, the police department has a seat on the working group created by the Department of Safety to look at employee health and wellness.

Please contact Specific Point of Contact at phone number with any questions.

Sincerely,

Matthew Murray
Deputy Chief of Administration
Denver Police Department

cc: Stephanie O’Malley, Executive Director of Safety
    Robert C. White, Chief of Police
    Laura Wachter, Deputy Director of Safety