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INTERNAL AUDIT DEPARTMENT Report Number: 2022-006

FINAL REPORT – Review of Compliance with Kronos Edits

August 2, 2022

Latona Thomas, CPA, CIA, Director Margarite Benevento, Senior Internal Auditor

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COBB COUNTY INTERNAL AUDIT

Latona Thomas, CPA, CIA

Director

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August 2, 2022

MEMORANDUM

TO: Dr. Jackie McMorris, County Manager

FROM: Latona Thomas, CPA, CIA, Director

SUBJECT: FINAL REPORT – Review of Compliance with Kronos Edits

Attached for your review and comments is the subject final audit report. The overall objective was to perform a review of compliance with Kronos edits¹ with Cobb County timekeeping policies.

Impact on the Governance of Cobb County

The three recommendations along with the corrective actions, when implemented, will strengthen the controls over the edit process in Kronos. County leadership and other stakeholders can be assured that employee pay based on Kronos edits are valid, completed, and properly supported with adequate documentation.

Executive Summary

During our preliminary survey, we identified existing controls within the Kronos system and various department controls designed to ensure that Kronos edits are in compliance with the County's timekeeping policies; however, additional countywide guidance and training is needed to ensure the consistency, completeness, and compliance of Kronos edits. Included in the accompanying pages are a detailed synopsis of our results.

Recommendations

We made three recommendations to strengthen the internal control environment over Kronos edits. The three recommendations are documented in the 'Results of Review' section of the report, on Pages 4 - 8.

¹ For the purposes of this review, we only reviewed the Board of Commissioners, agencies, and departments and does not include Constitutional Officers, Judicial and Other Elected Officials.

Responses

The County Manager provided a response to our draft report and concurred with each of the three recommendations. The complete responses to the draft report are included in Appendix III. We will perform a follow-up on corrective action in one year from the date of this report. A copy of this report will be distributed to those affected by the report recommendations, as reflected below. Please contact me at (770) 528-2559 or Margarite Benevento at (770) 528-2557 if you have questions.

CC: Jimmy Gisi, Deputy County Manager
Jim Harner, Chief Human Resources Officer
Glenda Valentine, Chief Human Resources Officer (Interim)
Bill Volckmann, Chief Financial Officer
Maureen Claffy, Payroll Division Manager, Finance Department

Background

Kronos is a time keeping system that simplifies the tasks involved with monitoring employee time and attendance among other services. In July 2005, Cobb County (the County) switched from the Timecare system to Kronos.

User Responsibilities

Each agency/department has one or more Kronos timecard editors that has access to edit transactions. There are also four people with access in Kronos as Superusers, who can sign-off on timecards, and post payroll adjustments.

Summary of Edits by Pay Code

We ran data from Kronos for each agency/department to determine the most frequently used pay code adjustments for the period October 1, 2021-January 31, 2022. This data was then combined to create a countywide analysis as seen in Table 1.

Summary of Edits by Pay Codes October 1, 2021 – January 31, 2022

Pay Codes	Total Number of Edits by Pay Codes	% of Total Edits
Meal Adjustment	4,144	34%
Standby Pay	3,001	25%
Leave Without Pay	1,148	9%
Braves Pay	898	7%
Parental Leave Pay	634	5%
Swap Pay Hours	533	4%
Bereavement Pay	269	2%
Military Leave	241	2%
Workers' Compensation	234	2%
Compensation Leave Usage	210	2%
Administrative Leave-Workers' Compensation	196	2%
Court Pay District Attorney	170	1%
Standby Compensation Pay	138	1%
Standby Pay Solicitor's Office	108	1%
Court Pay Solicitor's Office	100	1%
Swap Worked	93	1%
Administrative Leave Non-Workers Compensation	36	0%
Administrative Leave-Families First Coronavirus Response Act	34	0%
Standby District Attorney	18	0%
Jury Duty Pay	16	0%
Inclem Weather Pay	1	0%
Grand Total	12,222	100%

Table 1 - Source: The County's Kronos Time and Attendance System.

Top Five (5) Edits by Code²

We ran reports from Kronos for each agency/department and combined them to create a countywide analysis to determine the most frequently used pay code edits. The top five pay codes listed below consisted of 73% of all the pay code edits:

• Meal Adjustments (34%)

Meal adjustments are recorded when an employee's lunch period differs from their regular schedule. Per the Cobb County Time Keeping Policy, whether employees are to record a time punch for meals will be determined by the Department Head.

• Standby Pay (25%)

Per the Cobb County Personnel Payroll policy, employees assigned to "Standby" status will be paid two (2) hours compensation for each specified period of time or designated shift for which status is assigned. If an employee is called out, he or she shall be paid on a portal to portal basis for all hours worked.

• **Braves Pay (7%)**

Braves Pay is for employee time worked in conjunction with the Atlanta Braves activities.

• Swap Pay Hours³ (5%)

Per the Cobb County Time Keeping Policy, eligible Fire Department personnel and E911 personnel may utilize the Swap Policy of their respective departments. The 'swap time' hours for both employees will be captured in the time and attendance system. Per the Cobb County Fire Department policy, "Swap time occurs when there is an agreement between two employees whereby one of the employees has the other employee work for him/her, and then repays that employee⁴. Swap time is a privilege and will be conducted according to this guideline."

Additional analyses were required, and we judgmentally elected to address these edits in a supplemental letter report to be issued subsequent to this report.

• Bereavement Pay (2%)

Per the Cobb County Bereavement Policy, bereavement leave with pay will be granted for an employee's absence from duty in the event of a death in the immediate family. An employee may utilize such leave to make funeral arrangements, settle family affairs, attend the funeral or memorial services, and for bereavement. Full-time employees shall receive up to three (3) days of bereavement leave with pay (up to a maximum of 24 work hours or 36 hours for 56-hour employees). Part-time employees shall be eligible for bereavement leave equal to three part-time days off with pay (i.e., pay equivalent to their normal part-time schedule).

² Pay codes that require third-party independent approval (i.e., Human Resources or Payroll) were excluded from our sample. For this review, these pay codes were Leave Without Pay and Parental Leave Pay.

³ In addition to Swap Pay Hours, we included Swap Worked since it is an offsetting pay code. The review and results of these two pay codes will be issued in a supplemental letter report subsequent to this report.

⁴ In this instance, repayment does not have to be monetary but is usually reciprocated by working a shift of equal value.

Summary of Edits by Department

We analyzed the previously referenced data to determine which agencies/departments had the largest number of edits during our scope period. The results are

presented in Table 2 to the right.

The Cobb County Water System, Police Department, Fire Department, Department of Transportation, and Parks Department were among the higher edits, but the size of the edits are considered reasonable due to the size of the agencies/departments and corresponding service level.

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Pay Codes	Total Number of Edits by Pay Codes	% of Total Edits
Water	3,184	26%
Police	2,274	19%
Fire	1,609	13%
Department of Transportation	980	8%
Parks	937	- , - ,
Library	536	4%
Community Development	512	4%
Senior Services	477	4%
Property Management	417	3%
Commissioners	249	2%
Fleet	216	2%
Information Services	205	2%
Communications	108	
Human Resources	103	1%
Elections & Registrations	103	1%
Finance	96	1%
Tax Assessors	81	1%
Purchasing	78	1%
Medical Examiner	19	0%
County Manager's Office	12	0%
Extension Services	10	0%
Public Services	7	0%
Internal Audit	6	0%
Cobb EMA	3	0%
Support Services		0%
Grand Total	12,222	100%

Table 2 - Source: The County's Kronos Time and Attendance System.

The scope of our review period covered Kronos edits made by authorized editors for the period October 1, 2021 through January 31, 2022. Detailed information on our audit objectives, scope, and methodology is presented in Appendix I.

Results of Review

The overall objective was to perform a review of the compliance of Kronos edits with Cobb County (the County) timekeeping policies¹. We performed our preliminary survey procedures to understand the compliance requirements for Kronos edits, and gathered information on the different edits for each County agency/department. We also reviewed the applicable sections of the Fair Labor Standards Act (FLSA) and various County policies and conducted interviews of staff from both the Human Resources and Finance Department Payroll Division. In addition, we independently pulled Kronos reports for October 2021 through January 2022, and performed numerous analyses to determine the total number of edits by pay code, department, employee, frequency, etc. Based on our analyses, we identified the top five countywide Kronos edits by pay code: Meal adjustments, Standby pay, Braves pay, Bereavement pay, and Swap pay/worked⁵.

These pay codes represent 73% or 8,938 of the 12,222² edits (see Table 3 to the right) made for the four-month period reviewed. We randomly and judgmentally selected a sample of the top five pay code edits; obtained and examined supporting documentation for each; and requested additional information to understand the context of individual edit transactions.

1 1 1			
Top 5 Pay Code Edits			
Pay Codes	Total Number of Edits by Pay Codes	% of Total Edits	
Meal Adjustment	4,144	34%	
Standby Pay	3,001	25%	
Braves Pay	898	7%	
Swap Pay Hours	533	4%	
Bereavement Pay	269	2%	
Swap Worked ³	93	1%	
Grand Total	8,938	73%	

Table 3 - Source: The County's Kronos Time and Attendance

We identified existing controls within the Kronos system and various department controls designed to ensure that Kronos edits are in compliance with the County's timekeeping policies; however, additional countywide guidance and training is needed to ensure the consistency, completeness, and compliance of Kronos edits. Kronos' builtin system controls include restrictive pay code editing, and departments tracking controls include, but are not limited to the use of various forms, calendars, emails, schedules, and other online documentation. Despite these control activities, 48-57% of the sampled agencies/departments that provided documentation to substantiate sampled edits that was deemed incomplete, noncompliant, and/or inadequate based on established criteria and best practices. Current County policies and the 'Time Editor User Guide' does not specifically address what constitutes sufficient documentation for pay code edits or any requirements for periodic training for authorized timecard editors. The accompanying pages include recommendations to address the additional guidance and training needed.

Control Activities over Kronos Edits Need to be Improved

During this review, we identified weaknesses in the control environment over pay code edits for the Kronos system. Specific control activities needed include adequate guidance and training for timecard editors; consistent retention of supporting documentation for edits; and additional parameters for meal adjustment pay code edits. Improvements in these areas will strengthen the internal control environment to provide a clear understanding of its purpose, and minimize the risk of errors, noncompliance, or theft of time. These areas of necessary improvements are detailed below.

⁵ Swap pay/worked hours require additional analyses. As such, we judgmentally elected to address those pay code edits separately and will present a supplemental letter report of the results.

Additional Countywide Guidance and Training is Needed

Guidance

During our review, we found a lack of guidance in the timekeeping policy for what is required or expected for supporting documentation of Kronos timecard edits. We sampled 346 timecard edits over the four months identified and found that 69 (20%) transactions did not include sufficient, complete, or adequate documentation, 24 of which were based solely on verbal requests. Of the 69 transactions, documentation was not maintained or readily available for 45 transactions. The County's Timekeeping Policy and Kronos Time Editor Training Guide provide guidance for recording time and editing timecards, but neither provide specific requirements for documentation to support the pay code edits. Best practices for timekeeping control activities include electronic or written supporting documentation for all edits; prior supervisory notification and approval prior to meal adjustments; calendar or other electronic tracking tool of scheduled employees for both Braves and Standby pay; and the consistent use of a Leave Request Form or retention of Bereavement pay documentation. The lack of Countywide guidelines increases the risk of noncompliance with the Time Keeping Policy and record retention guidelines, inconsistent supporting documentation, inefficient use of timecard editors' time, and inaccurate time records. Even though employees and supervisors are required to review and approve bi-weekly timecards, the approvals do not eliminate the record retention requirements for Kronos edits.

Training

The current training for Kronos time and attendance recording and editing is not sufficient to ensure timecard edits are properly supported with documentation. Specifically, we found that persons new to supervisor roles or time editing responsibilities are required to attest to their understanding and expectations of the Time Keeping Policy and Kronos Time Editor Training Guide. The County's Time Keeping Policy states "Each employee must receive and be trained on procedures for recording work and leave time prior to being issued a time and attendance badge". As such, during the County's initial orientation, employees are given a brief overview of Kronos and then directed toward the iCobb website where they can access the Kronos Employee Instructions, Employee Quick Reference Guide, and Time Editor Quick Reference Guide. These guides provide a general overview of requirements and how to use the Kronos system; however, employees and timecard editors are not provided with training on what documentation is needed to support the proper recordation of different pay codes. Additionally, there is not a documented process to ensure that supervisors or timecard editors receive periodic training on the required documentation for pay code edits.

The lack of an expanded training for Kronos timecard editors and employees on the expectations and/or requirements of the Kronos system increases the likelihood that errors could be made. Additional training would provide staff with the skills necessary for daily time recording, as well as the potential for an easier and more efficient transition to a timecard editor if required in the future. In addition, staff training on Kronos edits will help establish clearer expectations for staff and editors about the requirements and documentation for using a specific pay code.

Consistency of Supporting Documentation is Needed

As discussed earlier, there is a lack of consistency in the supporting documentation received for pay code edits. For instance, some employees send email correspondence and/or a pre-payroll adjustment forms stating they did not take a lunch while others are done verbally. There are currently no specific County criteria regarding the required documentation of pay code edits. Per the Time Keeping Policy, "It is the responsibility of each employee to ensure the accuracy of the entries recorded in the time and attendance system. Should an error or omission occur in recording work attendance or leave, it is the responsibility of the employee to submit an explanation in writing to his/her supervisor for correction. Failure to report omissions or errors may be deemed to be falsification of an official document, which is a request for payment."

For this review, we analyzed 30 agencies/departments. Our sample included 23 agencies/departments and 346 edits for our scope period. Sixty-nine (69) transactions were considered to have insufficient supporting documentation for the Kronos edits. Complete documentation helps to provide justification for decisions made and helps to minimize risks of errors, omissions and misreporting. Supporting documentation also communicates to stakeholders that may review the transactions as the what and why an edit was made. During our review, we also noted inconsistencies in the approval of pay code edits. For instance, there were departments who provided leave request forms, obituaries, death certificates, or notices for bereavement pay, while other departments may have had verbal notifications, text messages, or no written documentation of notification. There were 113 employees in our sample with a bereavement pay

edit, of which 52% did not take the full 3 days allowance per the Cobb County Personnel Policy. See Table 4 to the right. Although timing differences may impact the percentage of time taken, supervisors should ensure that employees are aware of the full bereavement leave benefit and available in accordance with the referenced policy.

Bereavement Pay	
Total Employees	113
Number of employees with less than	
3 days of bereavement pay	59
Percentage of employees that took less than allowed bereavement days	52%
Table 4 - Source: The County's Kronos Time and Attendance System.	

Braves Pay

Based on the data, approximately 99% of the Braves Pay is for Public Safety (Police and Fire) which is considered reasonable.

Standby Pay

Based on the data, the use of Standby Pay for Police at 55% is considered reasonable practice. As such the 27% for Water Department was also considered reasonable.

For Braves Pay, there were agencies/departments that provided a schedule listing the employees assigned to the Braves activities for that day, while other edits only had a text message or picture to verify attendance. For Standby Pay, some agencies/departments provided a calendar, or emails, while others did not retain documentation for the transactions sampled. Meal adjustments documentation included verbal, text, email, and pre-payroll adjustment forms. In some instances, the meal adjustment lacked supervisory approval.

As a best practice, adjustments made in Kronos should be done via written communication, with the appropriate documentation retained, and approved by the supervisor. Supervisory approval should be provided in advance, as applicable. The lack of guidance in the county's time keeping policy, as well as the time editor's guide for Kronos has led to inconsistencies in what is considered acceptable in each agency/department. Without documentation, we cannot determine whether or not the pay code has been used appropriately and to the benefit of the County.

⁶ Supporting documentation is defined as any type of list with an employee's name and dates or a calendar designating a shift with the employee's name for either Braves Pay or Standby Pay; an obituary, leave request form and/or email requesting time for bereavement pay; written notification via leave form or email requesting a meal adjustment.

Recommendations

The County Manager should require a collaboration of HR and Payroll to:

Recommendation 1: Review and update the county's timekeeping policy or create a guidance document to provide detailed information regarding the acceptable supporting documentation for timecard edits made in Kronos. Providing the information in the policy or a guidance document would allow for complete and consistent documentation countywide.

Auditee Response: Concur - The County Manager concurs and would appreciate IA scheduling time within the next 30 days to meet w/HR, Payroll and IA to implement strategies to collaborate on next steps.

Recommendation 2: Establish a periodic training module (i.e., review of entering time, leave, pay code edits, etc.) for Kronos to ensure that county staff and timecard editors have sufficient knowledge of the expectations and requirements.

Auditee Response: Concur - The County Manager concurs and asks that IA work w/HR in assisting in the development of training modules, including mandatory acknowledgement of stated training for time editors. Such training should be similar in scope as our Drug-free; No Harassment online training and should be launched within 3-6mos.

Additional Parameters for Meal Adjustment Pay Code Edits are Needed

The meal adjustment pay code was the most inconsistently supported pay code edit. We analyzed the meal adjustment edits by employee based on 80 workdays between 10/1/2021-01/31/2022, excluding holidays and weekends. As shown in Table 5 below, 17 employees had more than 40

meal adjustment edits or 50% of their workdays required. Another 17 employees required meal adjustments for 25% of the workdays with the remaining employees requiring meal adjustments for less than 25% of these workdays. This creates an inefficient, manually,

wear Adjustments			
	% of time	Number of Employees	Number of Edits
<20 edits (1-19)	24%	599	2,609
≥20 edits < 40 edits (20-39)	26%	20	555
>40 edits	50%	17	980
Totals	636	4,144	

,	and	time-co	nsuming
	proces	s to	review,
	input,	monitor	r, and/or

Table 5 - Source: The County's Kronos Time and Attendance System.

Meal Adjustments		
A/Dtt	Total Number of	
Agency/Department	Edits	
Parks	737	
Water Department	537	
Library	485	
Community Development	409	
Senior Services	379	
Fire	313	
Department of Transportation	229	
Commissioners	215	
Fleet	152	
Police	141	
Information Services	85	
Finance	85	
Elections and Registrations	78	
Communications	77	
Tax Assessors	72	
Property Management	71	
Purchasing	60	
County Manager	7	
Public Services	6	
Human Resources	6	
Grand Total	4 144	

and Attendance System.

retain. Editors may also have more than one employee and if there are multiple adjustments and the information is not readily available, obtaining documentation from an employee can be time consuming. For instance, if an editor has 5 employees and each employee requires an edit for every day of the payroll period (10) an editor could be making up to 50 edits that should all have documentation. Timekeeping Policy does mention that lunch periods will be deducted if an employee works over five (5) hours unless a "no lunch" has been approved by the employee's supervisor. Time editors manually enter in the adjustments instead of the supervisor's contacting HR to update an employee's profile which would decrease the number of manual entries. Table 6 to the left provides additional details into the number of 'meal adjustment' edits performed by each agency/department over Table 6 - Source: The County's Kronos Time the course of the four-month period identified.

In some instances, meal adjustments made by timecard editors did not reflect prior approval of the supervisor. In these instances, the timecard edit is made to timely facilitate payment and not to negatively impact an employee's pay. As stated in the previous result topic, the employee is responsible for providing an explanation in writing to their supervisor; however, we determined that does not consistently happen. An inefficient use of time by Kronos editors to correct or adjustment time by the employee that could have been done via HR scheduling.

Recommendation

The County Manager should require a collaboration of HR and Payroll to:

<u>Recommendation 3:</u> Establish parameters for the use of the meal adjustment pay code edits or require revisions to employee schedules in the Kronos system (via HR scheduling) to potentially decrease the number of edits to be adjusted on each employee's timecard.

<u>Auditee Response</u>: Concur - The County Manager concurs and will discuss at the next DH meeting to ensure that this issue is of great concern. I support establishing such guidelines and ask IA and appropriate managers to create a mini-task force to establish such parameters/guidelines within the next 45-60 days.

Detailed Objectives, Scope, and Methodology

We conducted this audit in conformance with The Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing. Our overall objective is to review Kronos edits for compliance with Cobb County timekeeping policies. Our scope period covered transactions from October 1, 2021 through January 31, 2022.

To accomplish our objective, we performed the following steps:

- 1) Based on our preliminary analyses of timecard edits (*refer to the individual department analysis workpapers*) for the period October 1, 2021-January 31, 2022, we identified the top 5 pay code edits for field work.
- 2) For each of the top five timecard edits (Meal Adjustments, Standby Pay, Braves Pay, Bereavement Pay, and Swap Pay (Swap Worked), we generated a random sample.
 - a. Summarized and Documented the results.
- 3) For each of the sampled edit transactions, we requested (*via email*) supporting documentation from the respective agency or department.
 - a. Requested any notes/information needed to understand the context of the individual edit transactions.
- 4) Based on the responses from procedure step 3 above, evaluated each agency or department response based on the following:
 - a. Completeness of the response;
 - b. Compliance with the County's timekeeping policies;
 - c. Adequacy of the documentation received to support the timecard edit;
 - d. Agreement of edits to supporting documentation regarding date and time; and
 - e. Retention of documentation.
 - f. Summarized and concluded on the results for procedure steps 4.a. 4.e., at the respective agency or department level.
- 5) Based on our preliminary analyses of timecard edits (*refer to the individual department analysis workpapers*) for the period October 1, 2021-January 31, 2022, summarized and analyzed the Countywide timecard edits for patterns.
- 6) Based on the fieldwork procedures performed, identified areas of improvements and made the necessary recommendations.

Appendix II

Outcome Measures

This appendix presents detailed information on the measurable impact that our recommended corrective actions will have on County governance. These benefits will be incorporated into our annual report to the Board of Commissioners, Audit Committee, and County Manager.

Type and Value of Outcome Measure:

- Compliance with the County's Timekeeping Policy Actual; Recommendations, when implemented, will ensure that Kronos edits made in compliance with established policy and County expectations (See Pages 4-8).
- Record Retention Actual; Recommendation, when implemented, will ensure that adequate supporting documentation is retained to justify timecard edits (See Pages 6-8).
- Increased efficiency over Kronos edits Actual; Recommendation, when implemented over Kronos edits by reducing the number of edits required (See Page 6-8).

Methodology Used to Measure the Reported Benefit:

During the audit period, October 1, 2021 – January 31, 2022, we reviewed Kronos pay code edits for the agencies and departments under the BOC. We analyzed the edits by pay code type, agency/department, employee, and frequency over an 80-workday period, excluding holidays and weekends.

Auditee's Response



COBB COUNTY MANAGER'S OFFICE

Jackie R. McMorris, EdD

County Manager

100 Cherokee Street, Suite 300 Marietta, GA 30090-7000 Phone: (770) 528-2600 Fax: (770) 528-2606 jackie.mcmorris@cobbcounty.org

DATE: August 1, 2022

TO: Latona Thomas, CPA, CIA, Director, Internal Audit

FROM: Dr. Jackie McMorris, County Manager

SUBJECT: Audit Response - Review of Compliance with Kronos Edits

Several recommendations were made and our response to those recommendations are below.

Recommendations

The County Manager should require a collaboration of HR and Payroll to:

Recommendation 1: Review and update the county's timekeeping policy or create a guidance document to provide detailed information regarding the acceptable supporting documentation for timecard edits made in Kronos. Providing the information in the policy or a guidance document would allow for complete and consistent documentation countywide.

Response: The County Manager Concurs and would appreciate IA scheduling time within the next 30 days to meet w/HR, Payroll and IA to implement strategies to collaborate on next steps.

Recommendation 2: Establish a periodic training module (i.e., review of entering time, leave, pay code edits, etc.) for Kronos to ensure that county staff and timecard editors have sufficient knowledge of the expectations and requirements.

Response: The County Manager Concurs and asks that IA work w/HR in assisting in the development of training modules, including mandatory acknowledgement of stated training for time editors. Such training should be similar in scope as our Drug-free; No Harassment online training and should be launched within 3-6mos.

Recommendation 3: Establish parameters for the use of the meal adjustment pay code edits or require revisions to employee schedules in the Kronos system (via HR scheduling) to potentially decrease the number of edits to be adjusted on each employee's timecard.

Response: The County Manager Concurs and will discuss at the next DH meeting to ensure that this issue is of great concern. I support establishing such guidelines and ask IA and appropriate managers to create a mini-task force to establish such parameters/guidelines within the next 45-60 days.

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