



**OFFICE OF THE CITY AUDITOR**  
Long Beach, California

LAURA L. DOUD, CPA  
City Auditor

August 8, 2011

Richard D. Steinke  
Executive Director, Harbor Department  
City of Long Beach  
California

Dear Mr. Steinke,

Our Office performed a review of the Security Division (Division) of the City of Long Beach Harbor Department (Harbor) relating to overtime incurred by the Division's Dive Team. The review focused on the Division's controls over the Dive Team's overtime and approval processes.

Overall, we found the Dive Team operation lacked proper controls resulting in unjustified overtime and inefficient use of manpower. The Dive Team is relatively new and has grown significantly in the last two years, which may have contributed to the lack of structure and effective oversight. Our key findings and conclusions are:

- Division supervisors were unable to account for how the Dive Team spent a majority of their time, including overtime, due to inadequate documentation and oversight.
- Scheduling techniques for the Dive Team led to unnecessary overtime. In particular, Dive Team members are not routinely used to perform Division Patrol duties, even though they have received the appropriate training. By not using the Dive Team for Patrol operations, Patrol's overtime costs were substantially higher.
- While Division supervisors represented the Dive Team spends a significant amount of time training, the Division does not have a formal training plan to account for their time spent or to ensure the Divers received the appropriate type of training.

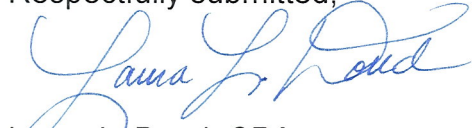
During our review, relations with the Division staff were problematic and as a result, we received incomplete and/or incorrect documentation and information. Therefore, additional pertinent information could exist for which we have not been made aware.

However, there was a significant change in Division management towards the end of our review and subsequent communication with these individuals has been very positive. Management appears to be making the necessary changes that will strengthen controls and provide appropriate oversight of Dive Team personnel. We have requested, and Harbor has agreed, to provide an update in six months on their progress in implementing our recommendations.

Richard D. Steinke, Executive Director, Harbor Department  
August 8, 2011  
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Detailed information regarding the results discussed above is included in the attached report. Questions or concerns can be directed to Deborah Ellis at 570-6989.

Respectfully submitted,



Laura L. Doud, CPA  
CITY AUDITOR

Attachment

cc: Board of Harbor Commissioners  
Mayor Bob Foster  
City Councilmembers



# **City of Long Beach Office of the City Auditor**

## **Harbor Security Division Dive Team Overtime Review**

**July 2011**

**Laura L. Doud, CPA**  
City Auditor

# Harbor Security Division Dive Team Overtime Review

July 2011



## Audit Staff

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City Auditor: Laura L. Doud  
Assistant City Auditor: Deborah K. Ellis  
Deputy City Auditor: Terra Van Andel  
Staff Auditor: Hannah Morgan

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## Executive Summary

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The Office of the City Auditor (OCA) initiated a review of the Security Division (Division) of the City of Long Beach Harbor Department (Harbor) due to the high level of overtime. While most of the overtime is attributed to the Division's Patrol operations, we focused our review on the Harbor Dive Team (Dive Team) operations due to the identification of significant control issues surrounding the oversight of Dive Team personnel.

While performing our review, we interviewed Division personnel responsible for overseeing Dive Operations<sup>1</sup> (supervisors) and Dive Team members, reconciled eight weeks of payroll documentation, and reviewed training records.

Overall, we found the Dive Team operation lacked structure, planning and effective oversight, creating inefficiencies resulting in unjustified overtime and underutilization of manpower. The Dive Team is relatively new and has grown significantly in the last two years. This may have contributed to the lack of proper controls. Our main areas of concern include:

- We were unable to determine how the Dive Team spent a majority of their time due to inadequate and incorrect documentation and information provided by Division supervisors and staff.
- Dive Team members appear to have substantial down time, but work schedules are not adjusted to reduce unnecessary overtime. In addition, Dive Team members are not consistently used to assist with Patrol duties, even though they are trained to serve as Patrol. As a result, Patrol overtime is substantially higher.
- Division supervisors represented that Dive Team personnel spend the majority of their time training. However, the Division does not have a formal training plan to ensure personnel receive the appropriate type of training to maintain certification or address Harbor-related situations. Training hours and classes provided are not tracked by the Division.

At the onset of our review, we received cooperation and assistance from Division supervisors. Unfortunately, towards the end of our review, relations with the Division became problematic. Specifically:

- At our request to interview Dive Team members, the Division stopped all communication with us, instead instructing that all future communication be filtered through the Harbor's Chief Financial Officer.
- The Division would not provide us access to grant funding information, instead providing a signed statement by the prior Director of Security stating "the Division

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<sup>1</sup> Supervisory personnel consists of the prior Director of Security, the Chief Port Security Officer, and Dive Team Supervisor.

does not utilize federal or state grant funding to pay for personnel costs for regular time, overtime, back-fill or training.”

- We received conflicting information from Division supervisors as to which employees were classified as Dive Team members. Personnel not disclosed as divers were shown as actively diving on dive plans and seen in news articles featured as members of the Dive Team. As a result, the size and cost of the Dive Team detailed in our report may differ from subsequent information reported by the Division.
- Lastly, due to an overall lack of complete and correct documentation and conflicting statements from Division supervisors, we requested the supervisors sign a standard management representation letter attesting they had made all information available to us and were not aware of allegations of fraud or suspected fraud related to the subject of our review. The Chief Port Security Officer and Dive Team Supervisor refused to sign the letter. Therefore, additional pertinent information could exist for which we have not been made aware.

At the end of the review, we became aware of changes to Division management, which included the Managing Director of Trade Relations and Port Operations and the Interim Assistant Director of Security. Subsequent to the review, discussions with these individuals have been open and positive. The OCA is pleased with the progress and attention currently being implemented in the Division. We appreciate management's cooperation and respectfully request an update in six months on the Division's status in addressing the recommendations.

We recommend Harbor management ensure the Dive Team is managed appropriately by ensuring personnel are accountable for their time, including justification and approval for their overtime and training. Every step should be taken to ensure Dive Team resources are used efficiently, including assisting Patrol on a routine basis to help offset Patrol staffing needs and overtime.

## **Background**

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Within the City's Harbor Department rests a state-of-the-art Security Division. The Division employs approximately 62 employees, of which eight to ten are considered members of the Dive Team. According to the Harbor's website, the Dive Team is a subset of the Division's Patrol operation and conducts underwater inspections of facilities throughout the Harbor and assists in locating and removing navigational hazards.



Chart 1 illustrates the Dive Team's placement within the organization.

**Chart 1  
Dive Team Location In Organization**



### ***Dive Team History***

Approximately four years ago, the Division collaborated with the Long Beach Police Department (Police) to develop a joint security scuba dive team. Shortly thereafter it was decided that the communal scuba dive team would dissolve and the Police and Division would develop their own independent dive teams. Consequently, Division management began evaluating the Harbor's diving needs, including risk factors and associated costs. Division management determined it was in the Harbor's best interest to proceed with development of a commercial (otherwise known as "hardhat") dive team. Commercial divers differ from scuba divers in various ways including the type of diving gear used, training requirements, and diver capabilities, such as the depth they can safely dive.

With the transition from scuba to commercial diving, the Dive Team has increased in size from two divers in fiscal year (FY) 2007 to ten in FY 2010. As illustrated in Table 1, total salaries and overtime costs have risen by 341% over the four years, with overtime increasing by 194%. Overtime is generally paid at time and a half.

**Table 1  
Dive Team Salary and Overtime  
FY 2007 – FY 2010**

Fiscal Year	Salary	Overtime	Total
2007	\$ 83,479	\$ 35,531	\$ 119,010
2008	124,772	63,584	188,356
2009	350,700	96,517	447,217
2010	\$ 420,776	\$ 104,591	\$ 525,367



## Issues and Recommendations

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### Issue #1 – Lack of Structure and Oversight for Dive Team Results in Unjustified Overtime

As the Dive Team operations began and quickly grew, it was management's responsibility to ensure resources, including manpower, were used efficiently. At the time of our review, we found a significant lack of structure and oversight by Division supervisors of the Dive Team. This fostered an environment subject to inefficiencies, errors, and abuse in which the Division has incurred unjustified overtime.

The Division has a policy and procedures manual (Manual) dated September 1997. However, the Manual appears to mainly apply to Patrol employees, as the Dive Team does not follow the same procedures for recording or authorizing overtime. Division supervisors stated they were currently updating the Manual, but it was not provided to us during our review. Unlike the Patrol employees, which use an Overtime Approval Sheet to document, explain and approve overtime, the Dive Team does not follow a similar practice. Therefore, we relied on the statements of the supervisors which indicated the Sign-in Sheets would be the appropriate documentation to review to determine the reasons for the Divers' overtime. According to the Division's policy, Sign-in Sheets are the official record of employees' time worked and also provide the amount of overtime hours, the associated charge points and overtime codes.

However, we found the Dive Team Sign-in Sheets consistently lacked employee's entries and appropriate overtime codes. During the period reviewed, 79% of the Sign-in Sheets either had no corresponding employee sign-in entry for overtime or there was an entry but no associated overtime code. One diver did not sign-in for 58% of the overtime in which he received compensation. Another diver did sign-in but did not acknowledge an overtime code for 82% of the entries. Table 2 summarizes the overtime codes used on the Sign-in Sheets by the Dive Team during the eight weeks reviewed.

**Table 2**  
**Review of Overtime Code Usage**  
**Over Eight Week Period<sup>2</sup>**

Overtime Code per Sign-in Sheet	Dive Team Overtime
No Code	52%
Did Not Sign In	27%
Other	9%
Training	9%
Meeting	3%
Total	100%

**Note:** "Other" represents overtime coded to training coverage, special event, and extended watch.

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<sup>2</sup> The eight weeks reviewed were the payroll weeks beginning as of 3/27/10, 4/03/10, 9/25/10, 10/2/10, 10/9/10, 10/16/10, 11/6/10, and 11/13/10. These eight weeks are consistent for each table's data in this report.

The lack of consistency with the Sign-in Sheets was not limited to the overtime entries. We also compared the Dive Team's regularly scheduled hours to Sign-in Sheets and found very similar issues. For 22% of days reviewed, Dive Team members were paid by the Division but did not sign-in to work. Sign-in Sheets related to one diver were incorrect 48% of the days reviewed. The diver either did not sign-in but was paid or was paid for more hours than represented on the Sign-in Sheets.

Insufficient oversight is not limited to the Sign-in Sheets. There is a significant amount of non-dive time that cannot be substantiated. For the 42 days reviewed, only two work-related (non-training) dives and 13 training dives took place. All of these dives appear to have been planned. This means that 65% of the Dive Team's time was non-dive related. When not diving, Division supervisors stated the team spends time maintaining equipment. However, there is no documentation or evidence to support the maintenance of equipment, the processes required, or how much time is spent.

Although we found non-dive time high at 65% for the period reviewed, the Dive Team was still able to accumulate large amounts of unjustified overtime. This was due to the overall lack of accountability and oversight by Division supervisors. During FY 2010, members of the Dive Team received approximately \$105,000 in overtime compensation. One diver received \$28,000 in overtime, representing 43% of base salary.

The Dive Team's scheduled hours versus overtime hours during an eight-week period are illustrated in Table 3. The eight weeks selected represent the highest overtime hours during the period we reviewed. On average, seven divers were compensated overtime representing 48% of their scheduled hours during the period reviewed. This equates to an average of 19 hours of overtime per week.

**Table 3**  
**Scheduled Hours vs. Overtime Hours**  
**Over Eight Weeks**

Divers	Scheduled Hours (SH)	Overtime Hours (OT)	OT as % of SH	Average OT Hours per Week
Diver 1	320.0	171.0	53%	21.4
Diver 2	300.0	159.0	53%	19.9
Diver 3	320.0	168.5	53%	21.1
Diver 4	320.0	158.5	50%	19.8
Diver 5	310.0	151.5	49%	18.9
Diver 6	320.0	144.5	45%	18.1
Diver 7	314.0	110.0	35%	13.8
Total	2204.0	1063.0		
<b>Average</b>	<b>314.9</b>	<b>151.9</b>	<b>48%</b>	<b>19.0</b>

**Note:** Two divers were new hires during periods reviewed and did not incur OT and one diver was on military leave resulting in only seven divers with OT.

Based on the information received and documents reviewed, we could not determine why the Dive Team required this level of overtime. Division supervisors did not provide documentation or supporting information to ascertain there was sufficient oversight and accountability of the Dive Team. It is imperative that a strong system of internal controls be developed to ensure the Dive Team is managed appropriately and held accountable, including adequate justification and approval for any necessary overtime. This is critical as any amount of overtime that cannot be adequately justified is deemed excessive.

#### **Recommendations to Issue #1:**

- 1) Develop written policies and procedures specific to the Dive Team, including the approval and justification of overtime.
- 2) Develop a strong system of internal controls to enforce policy including, but not limited to, the following:
  - a. Enforce the use of Overtime Approval Sheets (or another mechanism) by the Dive Team to ensure overtime is properly approved, accounted for, and justified;
  - b. Establish a process by which Sign-in Sheets are reconciled timely to Overtime Approval Sheets and hours compensated so that variances can be identified and investigated timely; and
  - c. Perform a thorough analysis of how Dive Team time is spent and how to better utilize those resources.

#### **Issue #2 – Current Dive Team Schedule Contributes to Unnecessary Overtime**

The Division requires 24-hour security coverage for the Harbor. To provide this coverage, Patrol officers are scheduled in three daily shifts. Due to the nature of the Dive Team's duties, they are not required to provide 24-hour coverage. Instead, they are scheduled to work a 4/10 shift (ten hours a day for four consecutive days) and respond to emergency situations as needed. As noted above, the Dive Team has a significant amount of non-dive time which should afford flexibility in scheduling to offset overtime and maximize manpower resources. However, supervisor's scheduling techniques encourage overtime rather than minimize it. Table 4 illustrates a summary of the overtime hours incurred by the Dive Team during the four pay periods we reviewed (eight weeks).

As stated above, Dive Team members are scheduled to work 10 hours a day for four consecutive days. Highlighted in yellow and blue is the overtime consistently incurred on days outside of the normal workweek. Although the high degree of non-diving time should allow the Division flexibility to adjust divers' schedules to reduce overall overtime costs, at no time did supervisors elect to modify the schedules.

**Table 4**  
**Summary of Dive Team Overtime**  
**During Four Pay Periods Reviewed**

	SAT	SUN	MON	TUES	WED	THUR	FRI	SAT	SUN	MON	TUES	WED	THUR	FRI	Totals
Diver 1	8	14	11	4	3	6	0	11	8.5	24.5	5	7.5	8	0	110.5
Diver 2	0	14	31	4	6	7	4	11	8	39.5	9	7.5	17	0	158
Diver 3	10	24	21	2	2	4	1	20.5	17	34.5	5	6.5	4	0	151.5
Diver 4	0	14	48.5	4	8	4	5	11	8.5	37.5	12.5	10	8	0	171
Diver 5	14	11	39.5	1	11	0	3.5	11	9.5	37.5	11	10	9.5	0	168.5
Diver 6	11	14	11	2	1	6	24.5	29	3	15.5	9	7.5	15	10	158.5
Diver 7	0	12	0	0	5	5	29.5	20.5	9.5	16	10	7.5	9.5	20	144.5
<b>Totals</b>	<b>43</b>	<b>103</b>	<b>162</b>	<b>17</b>	<b>36</b>	<b>32</b>	<b>67.5</b>	<b>114</b>	<b>64</b>	<b>205</b>	<b>61.5</b>	<b>56.5</b>	<b>71</b>	<b>30</b>	<b>1062.5</b>

	1st Shift (Monday - Thursday) worked by two divers
	2nd Shift (Tuesday - Friday) worked by five divers
	Overtime incurred on days when divers were not scheduled to work
	Overtime incurred for divers to attend school on Mondays

According to Division supervisors, a minimum of four divers are needed in order to perform a dive safely. In late 2010, the Division began staggering the Dive Team's schedules, and two divers were moved to a Monday through Thursday schedule while the remaining seven divers continued to work Tuesday through Friday. This creates one day during the regular workweek where only two divers are scheduled. If an incident occurs on that day, at least two other divers will be called in at overtime to meet the required number of a safe dive team (see Table 4 - Divers 1 through 5 overtime on Mondays).

Furthermore, several Dive Team members attend academy or set training programs lasting for several months. Division supervisors did not adjust the work schedules to adapt to training dates. For example, two Divers attend training every Monday, but their regular scheduled shift is Tuesday through Friday. This results in overtime pay every Monday to attend training as shown for Divers 4 and 5 on Table 4. Supervisors also indicated the same situation applies to periodic training provided by the Division. A one or two day training will be scheduled on non-work days. Instead of flexing the divers' schedule, overtime is automatically charged even though no regularly scheduled hours have been worked within the pay period.

Dive Team members are trained to perform Patrol duties. Division supervisors represented that Dive Team members are consistently used to cover manpower shortages within Patrol operations. However, according to time records and Dive members, this was not the case. Dive Team members only fill in for Patrol on a voluntary basis for scheduled Patrol absences. They are not used for unscheduled absences. As a result, overtime in Patrol operations is significant with an approximate \$596,000 of overtime incurred during FY 2010. Furthermore, when Dive Team members perform Patrol duties, it is usually at an overtime rate.

The Division's scheduling methods result in an inefficient use of available manpower and promotes unnecessary overtime. The Division has significant opportunities for scheduling reform which will reduce overall overtime costs for both Patrol and the Dive Team while maximizing service.

## **Recommendations to Issue #2:**

- 3) Perform a thorough analysis of Dive Team scheduling to identify areas where schedules can be modified to improve overall operations and increase efficiencies. Examples include, but are not limited to, the following:
  - a. Consider pre-set training and academy days when developing divers' regular schedule;
  - b. Consider staggering shifts evenly to better ensure the minimum number of divers to perform a dive are on duty; and
  - c. Consider utilizing members of the Dive Team to assist Patrol to offset Patrol overtime.

## **Issue #3 – No Formal Plan for the Dive Team Training Program**

Dive Team members and Division supervisors stated divers spend the majority of their time training. However, an annual training plan detailing certification requirements, refresher courses, and training specific to the Harbor does not exist. In addition, the Division maintains minimal records for the training provided. Due to the lack of planning and supporting documentation, we found very little supervisory oversight or structure surrounding the training program.

Many of the Dive Team members are licensed by the Association of Diving Contractors International (ACDI) and represent their training program aligns with that of the Occupational Safety and Health Administration (OSHA) and United States Coast Guard. However, Division supervisors nor the divers could provide formalized training requirements determined by these organizations.

Additionally, it was represented by Division supervisors that a significant amount of overtime is incurred for training purposes. We noted one training dive occurring on a Sunday (the first day in the pay period) where seven Dive Team members charged a total of 93 overtime hours. Even though the dive occurred on the first day of the pay period, overtime was charged prior to any scheduled hours worked. Training dives should be scheduled on regularly scheduled work days whenever possible or the divers' work schedule modified to avoid unnecessary overtime.

Division supervisors stated a large majority of the on-going training takes place offsite within the Port of Los Angeles. Without a formal training plan or the maintenance of training records, significant time spent offsite contributes to the lack of oversight in monitoring Dive Team activities.

### **Recommendations to Issue #3:**

Division supervisors should be more proactive with identifying training needs and requirements and developing a plan to best maximize their resources and manpower without incurring overtime. A system to ensure transparency with the Dive Team training program so that divers are held accountable for time spent training should also be developed. Specifically:

- 4) Perform an analysis to determine the training needs and requirements of the Dive Team.
- 5) Develop a written training plan for the Dive Team to ensure transparency and accountability, outlining areas including, but not limited to:
  - a. Identification and justification for training needs and requirements, including the governing agency who sets the requirements;
  - b. A plan for each diver as to how they will meet the training needs and/or requirements;
  - c. Criteria for qualified training programs;
  - d. Record retention requirements for training;
  - e. Authorization or approval path required to attend training; and
  - f. Budget for costs and hours associated with training.
- 6) Develop a system of internal controls to ensure the Dive Team training plan is followed and that all precautions are taken to avoid incurring overtime for training purposes.

## **Appendix A**

### **Management's Response**

Harbor Department





The Port of  
**LONG BEACH**

August 3, 2011

Ms. Laura L. Doud  
City Auditor  
City of Long Beach  
333 West Ocean Blvd, 8th Floor  
Long Beach, California 90802

Dear Laura:

On behalf of the City of Long Beach Harbor Department, thank you and your staff for your collective efforts in reviewing the Harbor Department Security Division Dive Team overtime. The Harbor Department Executive and Security Division Management Team have reviewed the report and discussed it in detail with the Office of the City Auditor (OCA). The Harbor Department found the review quite helpful in further identifying opportunity areas for increased efficiencies and improved processes designed to reduce overtime cost, not only in the in the Dive Team, but across the Division.

For your review, attached are the specific responses from Harbor Department Management to the OCA Review and recommendations. Consequently, the Security Division has already commenced a process improvement program for the Dive Team in the areas of overtime, training, and procedures and we are quite optimistic these enhancements will further support the effectiveness of this valuable asset.

To ensure proper follow up, we intend to send an update of the process improvement plan to the OCA within six months of this response. Until then, please feel free to contact me or staff should you have any further requests. We thank you and your staff for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard D. Steinke'. The signature is fluid and cursive, with a large, stylized 'R' and 'S'.

Richard D. Steinke  
Executive Director  
Port of Long Beach

RDS/ss



**City of Long Beach  
Harbor Department Response  
to the  
Office of the City Auditor  
Harbor Security Division Dive Team Overtime Review**

**Response Summary**

The Office of the City Auditor (OCA) conducted a review of the Harbor Department Security Division Dive Team operations, specifically focusing on use of overtime. Harbor Department Executive Management and Security Division Management have reviewed the OCA report and have formulated a process improvement plan as a result of the review.

The Harbor Department found the review quite helpful in further identifying opportunity areas for increased efficiencies and improved processes designed to reduce overtime cost, not only in the Dive Team, but across the Division. As a result of the OCA preliminary review results shared with the Executive Staff on April 27, 2011, a number of corrective action initiatives were commenced and are either in process, or concept, including:

- ❖ Improved timekeeping procedures;
- ❖ Revised daily activity reports;
- ❖ Alternative scheduling methods;
- ❖ Review of Dive Team training and certification requirements;
- ❖ Revised Dive Team Policies & Procedures

The Harbor Department Security Dive Team provides a unique “commercial” dive capability not currently provided by either the Police or Fire Departments search and rescue dive teams. This commercial diving capability affords the Harbor Department an increased response capability to infrastructure and navigable waterway security concerns, salvage and business continuity issues, and increased resiliency within the Port complex. This mandate differs significantly from the Police and Fire Dive Teams whose focus is on public safety search and rescue operations. As such it is imperative that the Harbor Department Dive Team is utilized effectively and efficiently.

As the OCA has indicated in its Report, the Harbor Security Dive Team is a relatively new unit and did experience significant growth in personnel, from two (2) full-time equivalent staff in 2007 to ten (10) full-time equivalent staff in 2010, contributing to the higher overtime costs in real dollars.



While the eight week sampling by the OCA in the report did represent a higher than average utilization of overtime due to increased utilization of Dive Team members during those periods, the overall Dive Team overtime for the fiscal year appears relatively in scale to the mission. However, with respect to overtime justification and timekeeping documentation, the Harbor Department agrees with the OCA that improvements are required.

The Harbor Department also acknowledges there were a number of Management changes happening in tandem with the OCA process. While communications with Security division Management during the audit did appear problematic, there has been a significant change in Division Management since the audit, and communications with the OCA appear to have improved over the past few months. As such we are confident any communications issues the OCA may have experienced heretofore have been resolved.

With respect to Federal, State, and regional grant funds, the Harbor Department does not use any grant funds for personnel expenses. The Harbor Department Security Division is regularly audited by the relevant grant authorities with no significant deviation findings.

Given the nature of the Security Division Dive Team operations, overtime is a necessary tool to achieve the proper balance of training and readiness. However, Harbor Department Security Division Management agrees with the OCA that improvements in timekeeping practices are warranted in order to eliminate any unjustified overtime costs, and the Division has already commenced a process improvement plan as outlined above.

## **Specific OCA Recommendations & Management Response**

### **Summary of Recommendation #1**

*"The OCA is recommending the development of written policies and procedures specific to the Dive Team, and ensure controls are developed to ensure the policies are enforced. This includes the appropriate documentation for time spent, including the approval and justification of overtime. This will assist management in analyzing the best use of Dive Team resources."*

Harbor Department Management agrees with the recommendation as follows:

1. *Develop written policies and procedures specific to the Dive Team, including the approval and justification of overtime.*

Management agrees that strong systems of internal controls are necessary in all aspects of Division management. The timekeeping process is currently being revised to improve both the internal controls and proper documentary support of these controls.

Supervisory procedures for the Dive Team include:

- Diver's logbooks signed by supervisory trainers;
- Diver's schedules and time cards reviewed and approved by Supervisors, the Chief Port Security Officer and/or the Assistant Director of Security.
- Dive Plans reviewed and approved by the Chief or Assistant Director of Security;
- The Dive Team Supervisor participates in daily "stand-up meetings" with Management and maintains contact via frequent e-mail communications.
- The Dive Team's activities planned and scheduled in advance.

2. *Develop a strong system of internal controls to enforce policy including, but not limited to, the following:*

- a. *Enforce the use of Overtime Approval Sheets (or another mechanism) by the Dive Team to ensure overtime is properly approved, accounted for, and justified;*

Management is currently revising the overtime approval process as well as the timekeeping process to improve the efficiency of the process, and to reduce the possibility of unjustified overtime.

- b. *Establish a process by which Sign-in Sheets are reconciled timely to Overtime Approval Sheets and hours compensated so that variances can be identified and investigated timely; and*

Management agrees and has formed a Scheduling Task Group to address the areas of scheduling, timekeeping, and approvals.

- c. *Perform a thorough analysis of how Dive Team time is spent and how to better utilize those resources.*

Management continues to monitor Dive Team activities and analyze personnel utilization throughout the Harbor Patrol and implement improvements in scheduling and assignments in order to maximize personnel resources.

Management has implemented requirements for Dive Team members to submit daily logs which will be reviewed by supervisors against daily plans to ensure assignments and activities are relevant to the Dive Team mission and the overall mission of the Division. These logs will be kept on file per the Division Retention Schedule.



### **Summary of Recommendation #2**

*“The OCA is recommending a thorough analysis of Dive Team scheduling to identify areas where changes will improve the efficiency of operations, including the use of Dive Team members to assist in Patrol.”*

Harbor Department Management agrees with the recommendation as follows:

3. *Perform a thorough analysis of Dive Team scheduling to identify areas where schedules can be modified to improve overall operations and increase efficiencies. Examples include, but are not limited to, the following:*

- a. *Consider pre-set training and academy days when developing divers’ regular schedule;*

Division Management agrees to review all scheduling methods and explore alternative scheduling options.

- b. *Consider staggering shifts evenly to better ensure the minimum number of divers to perform a dive are on duty; and*

Division Management agrees to review all scheduling methods and explore alternative scheduling options.

- c. *Consider utilizing members of the Dive Team to assist Patrol to offset Patrol overtime.*

Dive Team members are also trained Special Security Officers (SSO) and have been certified for land-side patrols. In fact, Dive Team Members have been increasingly utilized on landside patrol duties since the OCA audit was first conducted. Management agrees that an increased utilization of Dive Team members for landside patrol duties may reduce overtime in the Harbor Patrol Unit. As such regular land-side patrol watch schedules for Dive Team members will be instituted.

### **Summary of Recommendation #3**

*“The OCA is recommending the development of a comprehensive training plan which addresses all training needs and how they will be met, the planning and approval process, proper record retention, and related budgets and costs.”*

Management agrees that an increased focus on requisite dive team training and continuing education is essential to an effective and safe Dive Team. A comprehensive training plan which addresses all training needs is currently being developed by the Security Division. The Dive

Team training program has been based on the training and safety standards of the Association of Diving Contractors International (ADCI) Consensus Standards for Commercial Diving and Underwater Operations are applied to the Dive Team training program<sup>1</sup>, and these Standards are the basis for the Dive Team Training Program. However, based upon OCA findings, improvements to the Dive Team Training Program are being reviewed, including updated training scheduling, cost effectiveness, and approval process for diver training.

Currently, all Dive Team members have received formal training at an accredited commercial (e.g. “hard hat”) dive school.

*Division supervisors should be more proactive with identifying training needs and requirements and developing a plan to best maximize their resources and manpower without incurring overtime. A system to ensure transparency with the Dive Team training program so that divers are held accountable for time spent training should also be developed. Specifically:*

Management agrees that Dive Team Supervisors, who are also certified dive instructors of commercial divers, must also review Dive Training Plans against work schedules to minimize overtime impacts during training. A balance of continuing education and certification requirements, and effective utilization and cost impacts of the Dive Team complement must be further reviewed and evaluated.

*4. Perform an analysis to determine the training needs and requirements of the Dive Team.*

Management agrees and will conduct further certification and training analysis to ensure the Dive Team mission is balanced with the cost impact to the Division.

*5. Develop a written training plan for the Dive Team to ensure transparency and accountability, outlining areas including, but not limited to:*

- a. Identification and justification for training needs and requirements, including the governing agency who sets the requirements;*

Management agrees.

- b. A plan for each diver as to how they will meet the training needs and/or requirements;*

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<sup>1</sup> ADCI Consensus Standards for Commercial Diving and Underwater Operations – 5<sup>th</sup> Edition – These standards are used by the Security Division after the Diver graduates from dive school training and are deployed in the field. While in training at the dive academy, the specific dive school uses an ADCI-based curriculum which is followed by the Diver during training.



Management agrees.

*c. Criteria for qualified training programs;*

Management will continue to evaluate all qualified training programs to ensure the highest degree of safety and effectiveness are met.

*d. Record retention requirements for training;*

Division Management will work with the Information Management Division to ensure all recordkeeping and retention requirements for training are fully complied with.

*e. Authorization or approval path required to attend training; and*

All applicable candidates for the Dive Team will be rigorously evaluated by multiple layers of supervisory and management personnel to ensure ALL requisite skills, ethics, and abilities are met. Authorization for new candidates can only be provided at the Managing Director or above.

*f. Budget for costs and hours associated with training.*

Management will develop a detailed budget/cost analysis, both for training, and for relevant personnel, to ensure a complete and accurate understanding of the expense associated with Dive Team training is available.

*6. Develop a system of internal controls to ensure the Dive Team training plan is followed and that all precautions are taken to avoid incurring overtime for training purposes.*

Harbor Department Management supports strong internal controls in all areas of its operations. Management will institute regular review procedures and metrics to monitor the level of overtime incurred for training. Its goal is to minimize as much as possible the use of overtime during training.

Due to the complexities of securing the second largest seaport in the nation (by volume), the unforeseen events that do occur in the Harbor District that are unique to the operations and the mission, and the level of qualifications needed by those who protect it, overtime may continue to be a necessary option to ensure appropriate professional development and utilization of the Patrol and Dive Team officers.