

# *A REPORT BY THE NEW YORK STATE OFFICE OF THE STATE COMPTROLLER*

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**Alan G. Hevesi  
COMPTROLLER**



***OFFICE OF CHILDREN AND FAMILY  
SERVICES***

***GOSHEN RESIDENTIAL CENTER  
SHIFT EXCHANGE PRACTICES***

***2002-S-17***

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**DIVISION OF STATE SERVICES**

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**Alan G. Hevesi  
COMPTROLLER**

**Report 2002-S-17**

Mr. John A. Johnson  
Commissioner  
Office of Children and Family Services  
52 Washington Street  
Rensselaer, NY 12144

Dear Mr. Johnson:

The following is our report on shift exchange practices at the Office of Children and Family Services', Goshen Residential Center.

This audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution; and Article II, Section 8 of the State Finance Law. We list major contributors to this report in Appendix A.

*Office of the State Comptroller  
Division of State Services*

April 14, 2003

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## **EXECUTIVE SUMMARY**

### **OFFICE OF CHILDREN AND FAMILY SERVICES GOSHEN RESIDENTIAL CENTER SHIFT EXCHANGE PRACTICES**

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#### **SCOPE OF AUDIT**

The Office of Children and Family Services (OCFS) operates facilities for the care and treatment of youth adjudicated as juvenile delinquents or juvenile offenders, who are placed in its custody by family and criminal courts. OCFS operates over 40 residential centers, including Goshen Residential Center (Goshen), which is a 100-bed limited-secure facility located in Orange County. Of Goshen's approximately 120 employees, 78 are Youth Division Aides who are eligible to temporarily alter their work schedules by agreeing to work each other's shift. Such mutual shift exchanges are allowed by State and Federal law.

Our audit addressed the following questions about shift exchange practices at Goshen for the period April 1, 2001 through September 30, 2002:

- Were shift exchanges properly recorded on employee time sheets and approved, as required?
- Were shift exchanges performed as recorded, and in accordance with OCFS and Goshen policy?
- Were shift exchanges adequately monitored?

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#### **AUDIT OBSERVATIONS AND CONCLUSIONS**

We found that shift exchanges at Goshen often were not recorded on employee time sheets, were not always approved as required, and were not always performed as approved. We concluded that shift exchanges were not closely monitored, and as a result, there was a significant risk that exchanges could be abused. In our review of selected transactions, we identified such abuse. We recommend that shift exchanges be monitored more closely. During the course of our audit, Goshen officials took several measures to improve controls over shift exchanges.

When employees at Goshen exchange a shift, they are required to record the exchange on their time sheets, which should accurately reflect their actual presence at work, or absence from work, during the shift. However, we found that employees who exchanged shifts often did not record the exchange on their time sheets. As a result, the time sheets were inaccurate: they incorrectly showed that absent employees worked their scheduled shifts, and incorrectly showed that employees who actually worked certain shifts were absent for the shifts. Since the inaccurate time sheets were signed by the employees' supervisors, we concluded that improvements are needed in the reliability of the supervisors' review of time sheets. (See pp. 4-6)

When time sheets are not closely reviewed by supervisors, inappropriate practices are less likely to be identified and employees are more likely to be paid for time that was not actually worked. We determined that one employee did not follow through on several shift exchange agreements, as other employees worked a shift for this employee, but this employee did not reciprocate and work a shift for the other employees. Usually, the other employee worked his regular shift in addition to the exchanged shift, but on one occasion, neither employee worked the shift, and as a result, an employee was paid for time that was not actually worked. (See p. 6)

According to Goshen's shift exchange policies, all exchanges must receive prior approval and meet certain other requirements (e.g., they must be reciprocated within two payroll periods). However, we found that some exchanges were not approved, other exchanges were not executed as approved, and other exchanges did not meet certain other requirements. We also found that some exchanges were approved even though they contained conflicting dates (some employees sought to exchange the same shift more than once) or exceeded the maximum number of hours allowed for exchanges in a single payroll period. We concluded that the form used by Goshen officials to document prior approval for shift exchanges does not by itself provide sufficient control over the exchanges. To provide better control, we recommend that the information on the forms be entered into an automated tracking system, and this system be used to determine whether approved exchanges are appropriate and are executed as approved. We also recommend that employees be disciplined for infractions and abuses of shift exchange policies. (See pp. 7-10)

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## **COMMENTS OF OCFS OFFICIALS**

OCFS officials generally agreed with our recommendations and indicated that they have taken steps to implement them. Regarding Recommendation 4, OCFS indicated that developing an automated tracking system, as suggested, would not be practical at this time, so instead it has implemented an enhanced system of manual controls to monitor shift exchanges.

# **CONTENTS**

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## ***Introduction***

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Background	1
Audit Scope, Objectives and Methodology	2
Response of OCFS Officials to Audit	3

## ***Controls Over Shift Exchanges***

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Time Sheet Recording and Supervisory Review	4
Recommendations	6
Monitoring Shift Exchanges	7
Recommendations	9

## ***Appendix A***

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Major Contributors to This Report

## ***Appendix B***

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Response of OCFS Officials

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# INTRODUCTION

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## Background

The Office of Children and Family Services (OCFS) operates secure, limited-secure and non-secure facilities for the care, custody, treatment, housing, education, rehabilitation and guidance of youth, adjudicated as juvenile delinquents or juvenile offenders, who are placed in its care by family and criminal courts. OCFS operates over 40 residential centers, including Goshen Residential Center (Goshen), which is a 100-bed limited-secure facility located in Orange County.

Section 134 of the New York State Civil Service Law allows employees in the same title to mutually agree to exchange shifts. Shift exchange occurs when two employees temporarily alter their work schedules by agreeing to work each other's shift. In return for working each other's shift, they each receive a shift off with no charge to leave accrual balances. Section 135 of the Civil Service Law prohibits an employee from receiving extra salary or compensation for working swapped time.

Section 207(p)(3) of the Federal Fair Labor Standards Act stipulates that an employee working a shift exchange receive only an exchanged shift in return and is not eligible for overtime for the exchanged shift worked. All hours worked in a shift exchange belong to the employee initiating the exchange, not the employee who actually works the shift.

OCFS allows Youth Division Aides at residential centers to exchange shifts with one another. About 80 of Goshen's approximately 120 employees are Youth Division Aides. According to OCFS officials, shift exchange is offered by management to allow employees to have desirable shifts off as needed, primarily weekends and evenings. By allowing employees to trade days worked, they expect to keep overtime and sick leave abuse down, and maintain a minimum staffing level.

All shift exchanges at Goshen must receive prior approval. This approval is to be documented on a prescribed shift exchange agreement form, which contains the names of the two employees participating in the exchange, the time and dates of

the shifts to be exchanged, and a description of who will work which shift. Each form is to be signed by both employees, both employees' supervisors, and the facility director or designee. In addition, the hours actually worked by each employee during the exchange are to be fully disclosed on each employee's time sheet. During the period covered by our audit, Goshen used OCFS Bulletin 91-03 *Guidelines for Voluntary Shift Exchange* as its official policy and procedures for shift exchanges. OCFS advised us that these guidelines were subsequently withdrawn pursuant to a union agreement, and shift exchange guidelines are now handled as local agreements between each facility and the union.

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### ***Audit Scope, Objectives and Methodology***

We audited shift exchange practices at Goshen for the period April 1, 2001 through September 30, 2002. The objectives of our performance audit were to determine whether shift exchanges at Goshen were (1) properly recorded on time sheets and approved, as required (2) performed as recorded and in accordance with OCFS and Goshen policy, and (3) adequately monitored. To accomplish these objectives, we interviewed officials at Goshen and the OCFS Central Office. We also reviewed written policies and procedures and examined time sheets at Goshen and the OCFS Central Office.

We conducted our audit in accordance with generally accepted government auditing standards. Such standards require that we plan and perform our audit to adequately assess those operations which are included in our audit scope. Further, these standards require that we understand Goshen's internal control structure and its compliance with those laws, rules and regulations that are relevant to the operations included in our audit scope. An audit includes examining, on a test basis, evidence supporting transactions recorded in the accounting and operating records and applying such other auditing procedures as we consider necessary in the circumstances. An audit also includes assessing the estimates, judgments, and decisions made by management. We believe that our audit provides a reasonable basis for our findings, conclusions and recommendations.

We use a risk-based approach when selecting activities to be audited. This approach focuses our audit efforts on operations that have been identified through a preliminary survey as having the greatest probability for needing improvement. Consequently, by design, finite audit resources are used to identify where and how improvements can be made. Thus, little audit effort is devoted to reviewing operations that may be relatively efficient or effective. As a result, our audit reports are prepared on an “exception basis.” This report, therefore, highlights those areas needing improvement and does not address activities that may be functioning properly.

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### ***Response of OCFS Officials to Audit***

We provided a draft copy of this report to OCFS and Goshen officials for their review and comment. Their comments have been considered in preparing this report, and are included as Appendix B. We modified some of the text of our report to reflect comments in OCFS’ response.

OCFS officials generally agreed with our recommendations and indicated that they have taken steps to implement them. Regarding Recommendation 4, OCFS indicated that it determined that developing an automated tracking system, as suggested, would not be practical at this time, so instead it has implemented an enhanced system of manual controls to monitor shift exchanges.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Office of Children and Family Services shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor.

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## **CONTROLS OVER SHIFT EXCHANGES**

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We found that shift exchanges at Goshen often were not properly recorded on employee time sheets. We also found that exchanges were not always properly approved, and were not always performed as approved. We further found that some exchanges did not comply with other requirements. Because the documents that were supposed to document swaps could not be relied upon, we could not establish the extent of swapping that occurred during our audit period, and although some abuses were identified, the full extent of abuses could not be determined.

We concluded that shift exchanges were not closely monitored, and as a result, there was a significant risk that the exchanges could be abused. In our review of selected transactions, we identified instances of such abuse, including an employee who repeatedly did not follow through and reciprocate exchanges. We recommend that certain improvements be made in Goshen's shift exchange practices, and that the practices themselves be monitored more closely.

We note that, during the course of our audit, Goshen officials took several measures to improve controls over shift exchanges.

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### ***Time Sheet Recording and Supervisory Review***

OCFS employees record their work time on time sheets that cover two consecutive biweekly payroll periods. Employees are expected to record the hours of work, including all overtime, for each day they work. Absences are to be noted by abbreviations for the type of absence. Supervisors are to review the time sheets, return them for correction if needed, and sign the time sheets to certify that they are accurate. Employee and supervisor responsibilities for completing and reviewing time sheets are described in the OCFS Policy and Procedures Manual.

According to Goshen's policies and procedures, employees are required to record shift exchanges on their time sheets in a prescribed manner. An employee not working a scheduled shift should record that the absence is due to an exchange, and indicate the name of the employee who is working the shift. The employee working the shift should record the hours worked and indicate the name of the employee who was scheduled to work the shift.

To test compliance with shift exchange policies and procedures, we selected a judgmental sample of 8 employees, of the 78 who were eligible to exchange shifts at the facility. Because such exchanges are infrequent at Goshen, we intentionally selected eight employees who appeared likely to have significant exchange activity. We included for testing, shift exchanges documented on exchange forms for the period April 1, 2001 through June 19, 2002. We obtained the forms, which showed the 8 employees exchanged a total of 52 shifts during the test period. These forms reflected a total of 104 entries that should have been documented on the respective time sheets (52 exchanges each involving two employees, results in a total of 104 time sheet entries). We also verified the entries against other Goshen records such as key logs and the AOD (Administrator on Duty) logs (logs which show employees working by shift).

We determined that the shift exchange was not properly recorded on the time sheet in 61 instances, as follows:

- in 29 instances, the time sheet incorrectly showed that the employee worked his regular shift, when the shift was actually worked by another employee, and
- in 32 instances, the time sheet incorrectly showed that the employee did not work, when the employee actually worked the shift of another employee.

According to Goshen officials, since an employee's immediate supervisor must approve the shift exchange agreement form, the supervisor should be aware of all of the shift exchanges planned by the employees in the unit. If the supervisor sees that an approved exchange is not reflected on the employee's time sheet, the supervisor should not sign the time sheet without questioning the employee about the shift exchange and requiring that the time sheet to be corrected. However, for all of

61 exceptions we identified, the inaccurate time sheets had been signed by the employee's supervisor. Based on these results, we conclude that the official time records do not accurately reflect time worked and cannot be relied upon to monitor shift exchanges. Further the supervisors, who are responsible for reviewing and signing these official time records, are not fulfilling their required supervisory obligations.

These monitoring lapses would allow abuses (such as not working an agreed exchange) to go undetected. Because the time sheets were not reliable documents of shift exchange activity, we reviewed other Goshen records (logs, etc.) to determine if the exchanges occurred as approved. We found that one employee did not work his end of the exchange on four separate occasions. In three of these cases, the employee this individual was exchanging with actually worked both ends of the exchange. We question why anyone would work both ends of an exchange without receiving some sort of compensation. This is prohibited by Section 135 of the Civil Service Law. In the fourth instance neither employee worked the exchanging employee's shift. This was undetected by the supervisor and this employee was paid for time not worked. The employee did not receive disciplinary action for these abuses at the time they occurred.

We also identified another instance in which an employee was paid for time that was not actually worked. In this instance, the time sheet incorrectly indicated that the employee had worked his regular shift. However, the key log for that day had no entries for him, and the AOD log showed that he called in sick. Since the error on the time sheet was not detected by the employee's supervisor, the employee's accruals were not charged for the absence. While this error does not relate to a shift exchange, it was identified during our review and is a further indicator of weaknesses in supervisory review of time sheets.

### **Recommendations**

1. Periodically re-issue memos to supervisors, reminding them of their responsibility to review time sheet entries for shift exchanges, and to obtain corrections, as necessary.

## **Recommendations (Cont'd)**

2. Periodically review submitted time sheets, shift exchange documents, and AOD logs to determine if policies and procedures are being followed.
3. Review the apparent abuses we identified and, if warranted, take appropriate disciplinary action.

(OCFS indicated that it has implemented recommendations 1, 2 and 3. Regarding recommendation 3, OCFS imposed a six month suspension of shift exchange privileges for 12 employees.)

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### ***Monitoring Shift Exchanges***

**M**anagement is responsible for monitoring for compliance with established policies and procedures, and for monitoring whether internal controls are in place and functioning as intended. According to Goshen's shift exchange policy, all exchanges have to be approved on the shift exchange agreement form and must be reciprocated within two payroll periods. In addition, the total hours exchanged cannot exceed the equivalent of two full shifts within any payroll period. Moreover, any employee who has been disciplined for time and attendance infractions within the last six months cannot participate in an exchange, and failure to honor a shift exchange may subject an employee to disciplinary action.

The shift exchange agreement form could be used to prevent abuse of shift swapping privileges, as the dates of the exchanged shifts are specified on the form and each exchange must be reciprocated within two payroll periods. However, the information on the shift exchange form is not actively monitored to ensure that the shifts are actually exchanged as planned and approved.

Our review of the 52 shift exchange agreement forms and supporting records that related to the eight selected employees disclosed the following discrepancies:

- In four cases, one of the shifts to be exchanged duplicated part of another exchange that was approved

on another form. In these instances, an employee received approval to exchange a certain shift with a certain employee, and subsequently received approval to exchange the same shift with another employee. We determined from our review of various time and attendance records that, when the shifts were actually exchanged, different shifts were substituted for the duplicate shifts. However, the approval of the duplicate exchanges indicates that there is inadequate supervisory oversight.

- Four of the eight employees selected for review did not always comply with the facility's time and attendance requirements. According to information in their personnel files, the four employees had been counseled or spoken to by their supervisors during our audit period because of time and attendance problems. Although none of the four had reached the stage (formal discipline) for which exchange privileges should have been withheld, their exchange activity should have been closely monitored. One of these four was the employee who did not work four exchanges.
- The employee we identified in the previous section of this report, who, on at least four occasions, did not follow through on a shift agreement, was not disciplined for any of these infractions. In fact, even though the employee did not reciprocate on three exchanges in March 2002, he received approval for six exchanges between May 1 and June 19, 2002.
- According to Goshen's shift exchange policy, no employee can exchange more than two full shifts within any single payroll period. However, we found one instance where an employee received approval to exchange three full shifts in a single payroll period.
- Not all shift exchanges were supported by a shift exchange agreement. Our preliminary testing of time sheets found nine instances where employees either worked or were absent due to a shift exchange but no form documented the exchange. This means that these shift exchanges may have occurred without prior approval. Goshen officials told us that the missing forms

may not have been retained or may never have been completed.

According to Goshen officials, unit supervisors, who approve the shift exchange agreement forms, are expected to monitor whether that all approved exchanges are executed as approved and are appropriately recorded on the time sheets. However, as was noted in the previous section of this report, shift exchanges often are not appropriately recorded on time sheets and the time sheets themselves do not appear to be closely monitored by supervisors. As a result, this lack of monitoring provides little assurance that shifts will be exchanged as planned and approved.

During our audit period, Goshen officials took several steps to improve their controls over shift exchanges. For example, they added new procedures to strengthen the prior approval requirements, and developed a tracking form to help confirm that an exchange has taken place as approved. They are developing an automated calendar to provide a single reference document for all exchange activity. They also, undertook measures to improve time recording practices by reissuing guidelines on the correct time sheet entries for shift exchanges and enforcing sanctions for non-compliance. Moreover, in September 2002, the officials suspended for six months the exchange privileges of seven employees who had violated existing shift exchange procedures. Four of the seven employees were among the eight who were selected for our review.

## **Recommendations**

4. Develop an automated tracking system for determining whether approved exchanges comply with policy and are executed as approved.

(OCFS considered this recommendation and determined that developing an automated tracking system would not be cost efficient at this time. As an alternative, it has implemented an enhanced manual system to monitor shift exchanges.)

### **Recommendations (Cont'd)**

5. Specify in policy what constitutes the abuse of shift exchange privileges, and specify how employees who abuse the privileges will be disciplined. Communicate and enforce the sanctions that are developed.
- (OCFS responded that it issued a detailed policy memo on September 12, 2002.)

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## **MAJOR CONTRIBUTORS TO THIS REPORT**

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New York State  
Office of  
**Children & Family  
Services**

George E. Pataki  
*Governor*

John A. Johnson  
*Commissioner*

February 26, 2003

Mr. William P. Challice, Audit Director  
Office of the State Comptroller  
Division of Management Audit  
and State Financial Services  
123 William Street-21<sup>st</sup> Floor  
New York, New York 10038

Subject: Draft Audit 2002-S-17

Dear Mr. Challice:

The Office of Children and Family Services has reviewed the draft audit report on Goshen Residential Center Shift Exchange Practices, issued January 13, 2003. Enclosed is our response for your consideration.

Sincerely,

Susan A. Costello  
Acting Deputy Commissioner  
for Administration

Enclosure

cc: L. Dobriko



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**Appendix B**

**NYS Office of Children and Family Services  
Response to Office of the State Comptroller (OSC)  
Draft Report 2002-S-17  
Goshen Residential Center – Shift Exchange Practices**

The New York State Office of Children and Family Services (OCFS) has reviewed Draft Report 2002-S-17 on the Goshen Residential Center's Shift Exchange Practices and offers the following response:

**General Comments:**

1. In the first paragraph on the first page of the Executive Summary, in the last sentence there is a statement about previous audits of the Department of Corrections. This sentence should be deleted from the report as it has nothing to do with OCFS and is misleading. However, if the sentence is not deleted, at a minimum, the words "in that Department" should be inserted after "exchanges" to clarify that the lack of monitoring was found in previous audits of that agency and not OCFS.
2. In the first paragraph on the Scope of the Audit on the first page of the Executive Summary and in the first sentence of the Background section on the first page of the report, the words "adjudicated as juvenile delinquents or juvenile offenders" should be inserted after "youth" to clarify the type of youth in care. In that same sentence, the words "referred to" should be replaced with "placed in" to more accurately set forth the applicable legal standard.
3. On page two of the draft report, reference is made to OCFS Bulletin 91-03 "Guidelines for Voluntary Shift Exchange". These guidelines were withdrawn pursuant to settlement of an improper practice charge filed by the CSEA. Shift exchange guidelines are now handled as a local agreement with each facility and the union.
4. On page seven of the report, the first sentence in the first paragraph under "Monitoring Shift Exchanges" states that management is responsible for monitoring to "ensure that" transactions occur in compliance with policies and procedures. This is unrealistic, as no amount of monitoring can "ensure" that policies and procedures are followed. The words "to ensure that" should be deleted, the words "occur in" should be replaced with "for", and "that" before "internal controls" should be replaced with "for monitoring whether" so that the sentence sets forth a realistic standard.
5. On page seven of the report, the second sentence in the second paragraph under "Monitoring Shift Exchanges" says that information is not monitored to "ensure" that shifts are actually exchanged. No amount of monitoring can "ensure" this. The words "ensure that" should be replaced with "determine whether", as that is the actual purpose of the monitoring in question.

6. On page eight of the report, in the last paragraph there is a statement in the first sentence that unit supervisors are expected to "ensure" that all approved exchanges are executed as approved. The supervisors cannot realistically be expected to "ensure" that this occurs. The words "ensure that" should be replaced with "monitor whether", which is what the supervisors should actually be doing.

**Response to Recommendations:**

**Recommendation 1:** Periodically re-issue memos to supervisors, reminding them of their responsibility to review time sheet entries for shift exchanges, and to obtain corrections, as necessary.

**OCFS Response:** All relevant memoranda were reissued to supervisors, reminding them of their responsibility to review time sheet entries for shift exchanges and to obtain corrections, as necessary.

**Recommendation 2:** Periodically review submitted time sheets, shift exchange documents, and Administrator on Duty (AOD) logs to determine if policies and procedures are being followed.

**OCFS Response:** Every Senior Youth Division Counselor is responsible for reviewing their staff's time sheet at the end of each payroll period. When a shift exchange is noted, the supervisor is to cross reference the time sheet entry with the AOD's documentation for verification of compliance with established procedures. Management will periodically review time sheets to determine if policy is being followed.

**Recommendation 3:** Review the apparent abuses we identified and, if warranted, take appropriate disciplinary action.

**OCFS Response:** Sanctions are in place to address violations. Upon review and verification of the auditor's findings, Goshen Residential Center imposed a six-month suspension of privileges for twelve employees who violated shift exchange procedures and/or submitted inaccurate time sheets. At present, six employees have their shift exchange privileges suspended. Goshen will continue to administer sanctions on all staff that violate the shift exchange policy.

**Recommendation 4:** Develop an automated tracking system for determining whether approved exchanges comply with policy and are executed as approved.

**OCFS Response:** OCFS has considered the recommendation and has determined that because of the limited numbers of staff involved, development and establishment of an automated tracking system for this purpose would not be an efficient use of resources at the present time. The facility, however, has developed a detailed system for tracking the process. All shift exchanges are now entered into a calendar by the Director's secretary. The information is readily accessible to all appropriate staff and used for tracking purposes. Management

will periodically review the tracking forms to determine if the exchanges have actually been worked.

**Recommendation 5:** Specify in policy what constitutes the abuse of shift exchange privileges, and specify how employees who abuse the privileges will be disciplined. Communicate and enforce the sanctions that are developed.

**OCFS Response:** The procedures for addressing abuse of shift exchanges is clearly delineated in a policy memo issued by the Facility Director on September 12, 2002 (see attachment).

**Goshen Residential Center**

**Memo**

**To:** All YDA Staff  
**From:** Roger Rascoe, Assistant Director  
**Date:** 9/12/2002  
**Re:** Procedure for Shift Exchanges

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Effective immediately, the following procedures must be followed for all Mutual Shift Exchanges between YDA staff.

1. Both employees must be of the same title (YDA II or YDA III)
2. Both employees must not have been disciplined for Time and Attendance issues within the last 6 months.
3. Employees must have completed their probationary period of employment.
4. The use of leave credits has been requested and denied or would be denied because it would result in inadequate coverage or results in overtime.
5. The exchange between the two employees is completely "voluntary".
6. The exchange must be completed within two consecutive time payroll periods.
7. The total number of hours of work exchanged by any employee shall not exceed the equivalent of two days in any bi-weekly payroll period.
8. The employees requesting a Mutual Shift Exchange must complete the required paperwork (OCFS Form 4500 and two copies of GRC Form 4500-1) and get the required approval signatures **BY CLOSE OF BUSINESS ON THE WEDNESDAY BEFORE THE WEEKLY SCHEDULE IS PREPARED ON THURSDAY.** (These forms are attached to this memorandum.)
  - a. In extraordinary circumstances and with the recommendation of the employee's supervisor(s), approval may be granted. However, staff must provide documentation of the extraordinary circumstance to their supervisor(s).
9. Upon approval by the Facility Director or designee, the forms shall be given to the Director's or Assistant Director's secretary for distribution. Distribution is as follows:

9. Upon approval by the Facility Director or designee, the forms shall be given to the Director's or Assistant Director's secretary for distribution. Distribution is as follows:
  - a. Copy to Director's file
  - b. Copy to each employee's supervisor
  - c. Copy to AODs for both Tour II and III
  - d. Copy to each employee along with one copy of GRC Form 4500-1
10. Each employee reporting for work on a Shift Exchange, shall bring the GRC Form 4500-1 to the AOD at the start of his/her tour of duty.
  - a. The AOD shall retain the form for the duration of the shift.
  - b. At the completion of the tour of duty, the AOD shall complete the appropriate section of the form and return it to the employee verifying the Shift Exchange was completed.
11. If an employee is scheduled to work on a holiday, but elects to exchange the holiday shift with an employee who was not scheduled to work the holiday, the employee originally scheduled to work the holiday receives holiday pay or time even though he/she did not actually work. The exchanging employee is not entitled to holiday compensation.
12. If an employee is scheduled to work two shifts on a holiday due to a Shift Exchange, the employee is only entitled to the pay for his/her "regularly scheduled shift" for that holiday.
13. The AOD is directed to order any employee to leave the facility who shows up to work on a Shift Exchange without prior approval even if it requires an employee from the prior shift to be mandated.
14. Any employee who fails to meet his/her obligation in fulfilling his/her part of a Shift Exchange shall be barred from Shift Exchanges for a period of six months.
15. Any employee who fails to meet his/her obligation in fulfilling his/her part of a Shift Exchange a second time shall be permanently barred from Shift Exchanges.
16. In any instance where an employee fails to report to work on a Shift Exchange, the AOD shall call the employee who was regularly scheduled to work and order the employee to report to work.
  - a. Any time lost from an employee who fails to show up for a Shift Exchange shall be charged to the employee who was regularly scheduled to work that shift.

17. A memorandum dated July 25, 2002 explaining the procedures for properly completing time records in relation to Shift Exchanges is also attached to this memorandum. It is expected that all staff shall complete their time records in compliance with these instructions.
18. Copies of the OCFS Form 4500 and GRC Form 4500-1 must be attached to the employee's time record.