Recommendati	on OPI		Implementation Actions	Action Implementation Date(s)	Responsibility for Delivery
1. Ensure implement of new procedures verifying overtime to provide assurar	s for Compensation & Claims Business for Transformation	•	Implement new procedures to review evidence supporting overtime claims, ensuring managers verify authenticity and legitimacy of claims.	September 2006	Manager, Corporate Compensation
the adequacy and quality of the FAA Section 34 certifica for overtime pay, consistent with the Treasury Board	ation	•	Meet with Chief Financial Officer to identify aspects of National Accounts Verification Framework that may be applicable to overtime payment transactions.	May 2006	
Accounts Verificat Policy. The verific procedures should	ation Compensation	•	Inform managers to retain evidence on file to support all overtime claims.		
include a risk-base examination of evi supporting overtim claims processed.	dence	•	Inform managers that if Audit Services opts to verify their claims, they must be able to produce files.		
		•	Issue communiqué to all managers explaining their new responsibilities and the enhanced verification that will be conducted by Audit Services.	June 2006	Manager, Corporate Compensation
		•	Develop a communications plan to inform managers of their responsibilities and how to fulfill them on a regular basis.	July 2006	Manager, Corporate Compensation
		•	Sign an MOU requiring the quarterly review of all high-risk overtime claims (cash or time in lieu) with Audit Services. Auditors will request supporting information (rationale, project	September 2006	DG Labour Relations and Compensation Sector

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	codes, etc).		
	 Develop the methodology for these reviews. 	October 2006	DG Labour Relations and Compensation Sector
	Perform a pilot review.	December 2006	DG Labour Relations and Compensation Sector
	Perform the first full review.	March 2007	DG Labour Relations and Compensation Sector
	• Contact other departments to determine best practices for dealing with the verification of overtime claims.	September 2006	Manager, Corporate Compensation
	 Incorporate these best practices into policy as appropriate. 	September— December, 2006	DG Labour Relations and Compensation Sector
	• Develop a risk management framework to aid in flagging high-risk claims. The framework will be developed through the MOU with Audit Services.	September 2006	Manager, Corporate Compensation

2.	Improve the Management of Overtime Reports issued to Branches by: • Clearly reporting on individual overtime; and • Providing standardized analysis	DG Classification, Compensation & Business Transformation (From July, 2006) DG Labour Relations and	•	Ensure reports clarify the relationship between reported overtime hours and compensation amounts. Consult with managers to determine how best to make reports more useful.	October 2006 October 2006	Manager, Corporate Compensation Director, Compensation & Director, Compensation
	(e.g., time series or cross sectional) on the information being distributed.	Compensation Sector				Systems
3.	Develop and implement the capability and procedures to verify overtime claims submitted through the	DG Classification, Compensation & Business Transformation	•	Contact other departments to determine best practices for dealing with the verification of overtime claims. (especially related to compensatory time off)	September 2006	Manager, Corporate Compensation
	LIMS system for which compensatory time off (leave) is requested in lieu of cash.	(From July, 2006) DG Labour Relations and Compensation Sector	•	Incorporate these best practices into procedures for verifying overtime claims for which time off is requested in lieu of cash, as appropriate	September - December 2006	Manager, Corporate Compensation
			•	Work with the Information Technology Specialists to identify potential system improvements that would assists in the verification of overtime requests and would enhance the quality of reports provided to Managers.	December 2006	Director, Compensation Systems & Director, Compensation Services
			•	Train compensation advisors (corporate and operations) to challenge questionable claims	January 2007	Manager, Corporate Compensation

	•	Review of time in lieu as well as cash payments will be included as part of the verifications conducted under the MOU (referred to under recommendation #1)	March 2007	CAC
	•	Review the existing policy and recommend changes to ensure internal audit issues are addressed and the policy is re-drafted	March 2007	Manager, Corporate Compensation