



OFFICE OF THE INSPECTOR GENERAL
MONTGOMERY COUNTY MARYLAND

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DOCR Key Control and Scheduling Systems Have
Yet to be Implemented

Department of Correction and Rehabilitation, Food Service Department

OIG Publication # OIG-21-001

JULY 22, 2020

EXECUTIVE SUMMARY

Why We Did This Review

During calendar year 2019, the OIG was contacted on multiple occasions by several Department of Correction and Rehabilitation (DOCR) employees regarding the former Food Service Department (FSD) Manager's perceived favoritism in scheduling and overtime assignments; poor communication which led to confusion regarding staff assignments and scheduling; and suspicions that staff was being paid for hours and overtime they did not work.

We engaged in this review because the allegations were similar to those explored and documented in our fiscal year (FY) 2018 review, *Department of Correction and Rehabilitation Personnel Complaints and Allegations*. We sought to understand if FSD implemented the Telestaff automated scheduling system, as presented in the Chief Administration Officer (CAO)'s response to our report, and whether that implementation effectively remediated concerns raised by complainants. Additionally, we attempted to determine whether FSD employees worked the hours for which they were compensated.

What We Found

1. Key control systems for the Montgomery County Correctional Facility (MCCF) and Montgomery County Detention Center (MCDC) do not adequately maintain a reliable and verifiable audit trail of who was assigned keys, when and which keys were received, and when they were returned.
2. DOCR spent over \$57,000 on a new key control system for MCCF without first arranging for appropriate resources to ensure timely installation of the system.
3. The DOCR Food Service Department failed to implement the Telestaff automated scheduling system and experienced significant problems as a result of its use of a paper scheduling system.

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BACKGROUND

During calendar year 2019, the OIG was contacted on multiple occasions by several different Department of Correction and Rehabilitation (DOCR) employees concerning the management of Food Service Department (FSD) personnel assigned to the Montgomery County Correctional Facility (MCCF). Many of the complaints we received were about the former Food Service Manager's treatment of MCCF staff. Prior to her resignation in November 2019, the former Food Service Manager's office was physically located at the MCCF facility where she personally prepared employee schedules and approved timecards for Correctional Dietary Officers assigned to MCCF. We did not hear similar complaints related to other DOCR locations. In reviewing these complaints, we noted that they had similar themes to those addressed in our fiscal year (FY) 2018 Advisory Memorandum, *Department of Correction and Rehabilitation Personnel Complaints and Allegations*.¹

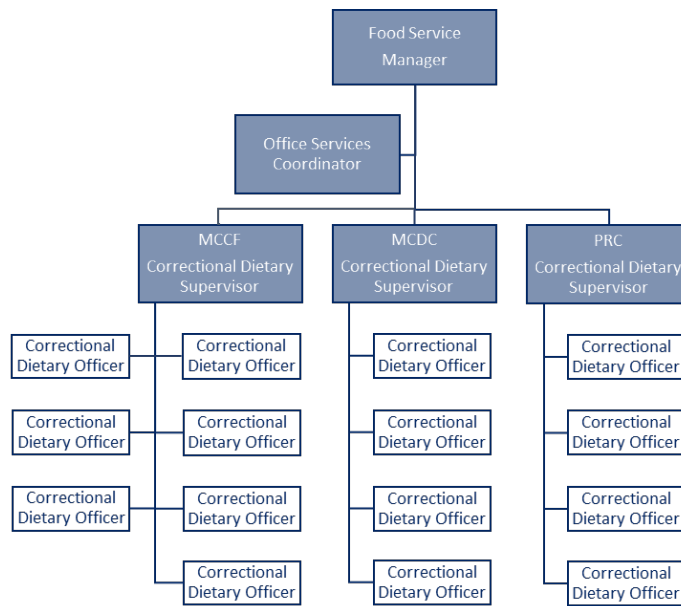
In our FY 2018 report we noted that a consultant hired by the Montgomery County Office of Human Resources (OHR) and DOCR found issues with staff perceptions of favoritism by DOCR management, a lack of fair and consistent application of personnel rules and regulations, and disparate treatment with respect to imposition of discipline. We ultimately concluded that the issues "appear to have clearly taken a toll on staff morale within DOCR. This toll cannot help but negatively affect the overall effectiveness, efficiency, and productivity of DOCR." The Chief Administrative Officer's (CAO) response to our report noted that the County had "identified funding necessary to purchase Telestaff", an automated scheduling system, "to automate its internal scheduling and tracking... [to] enhance transparency and establish real-time recordkeeping to alleviate DOCR's current scheduling and tracking challenges that are often paper driven."

The DOCR FSD operates three kitchens, one at each of the Department's facilities: the Montgomery County Correctional Facility (MCCF), the Montgomery County Detention Center (MCDC), and the Montgomery County Pre-Release Center (PRC). The FSD is overseen by the Food Service Manager who supervises the FSD program across all facilities.² (See figure 1.)

¹ OIG Report No. 18-002, dated August 11, 2017.

² The organizational chart refers to the Food Service Manager as the "Food Service Director". For consistency, we will refer to that position as the Food Service Manager to reflect the official job title included in the Montgomery County Office of Human Resources Classification Plan.

Figure 1: DOCR Food Service Department Organizational Chart



In addition to meeting the nutritional needs of inmates and DOCR staff, FSD staff act as role models, trainers, and supervisors for inmate workers engaged in food preparation activities.

Objectives, Scope, and Methodology

We sought to understand if FSD implemented the Telestaff automated scheduling system, as presented in the CAO’s response to our FY 2018 report, and whether that implementation effectively remediated concerns raised by complainants. Additionally, we attempted to determine whether FSD employees worked the hours for which they were compensated.

The scope of our review included all staff and supervisors assigned to the FSD from October 1, 2018 through September 30, 2019. Field work was conducted between October 2019 and January 2020.

We reviewed current policies and procedures, interviewed relevant staff, and analyzed a sample of records maintained by DOCR, including: key control system reports, swipe in/ swipe out records,³ timekeeping records, employee schedules, and FSD logbooks.⁴ We identified a set of sample dates during the review period and attempted to determine whether specific employees’ timekeeping/pay records matched the official schedule and actual hours worked.

³ MCDC does not have a swipe in/swipe out system.

⁴ PRS does not maintain logbooks.

BACKGROUND

Due to observations we made while looking at data, we expanded our review to include elements of DOCR's key control system.

Our review was conducted in accordance with the Association of Inspectors General, *Principles and Standards for Offices of Inspector General* (May 2014).

FINDINGS AND RECOMMENDATIONS

We encountered a variety of issues while analyzing a sample of paper and electronic records maintained by DOCR. We noted that the MCCF and MCDC key control systems failed to retain data beyond a narrow window. Furthermore, employees did not always swipe their badges when entering and leaving a facility, rendering the data incomplete. One logbook for the sample period was missing and for the logbooks that were available, we experienced difficulty interpreting handwritten entries. In the end, we were not able to adequately validate that FSD employees were present in a DOCR facility during the hours they claimed they were working.

While conducting this review, we found that much of DOCR began using Telestaff in 2018, but it was never implemented by FSD. Instead, FSD continues to rely on paper scheduling records which appear to be a continued source of contention and employee dissatisfaction. This is troubling, especially given that DOCR spent considerable funds to implement the electronic scheduling system.

Our more overriding concern, however, is the potential risk to inmates, residents, and staff associated with the use of obsolete or improperly functioning key control systems. The electronic key control systems at MCCF and MCDC do not maintain a reliable and verifiable audit trail beyond a narrow window. That is in spite of the fact that in FY 2018 DOCR spent over \$57,000 to purchase a key control system to replace MCCF's outdated system, which was never implemented.

Key Control System

In order to evaluate complaints regarding attendance and allegations of employees being paid for hours they did not work, we attempted to compare key control records with other scheduling and timekeeping information. Prior to the beginning of their shift, FSD employees log into a key control cabinet to obtain keys, which they use to access secure areas specific to their assigned duties. All three DOCR facilities use a version of an electronic key control system designed to allow DOCR managers to establish access permission levels based on individual users, trace key movements by time, date and user code, and generate activity reports.

The U.S. Department of Justice, National Institute of Corrections (DOJ/NIC)⁵ explains that an effective key control system should be designed so that only authorized users can access keys and includes adherence to procedures for the accounting, issuing, and tracking of keys. Electronic systems are generally more effective than manual methods of key control as they allow automated, programmed rules of access and result in an automatic, verifiable audit trail that records information regarding who, when and which keys were received.

We requested key control records for all three correctional facilities for the review period. We received comprehensive reports for PRC displaying information specific to employees assigned to FSD with all relevant information, including key retrievals and returns. Conversely, for MCCF and MCDC we received records showing the time that a key was retrieved but not complete information about when keys were returned. The lack of an audit trail prevented us from completing our analysis and revealed inherent vulnerabilities in the MCDC and MCCF key control systems.

Finding 1: Key control systems for MCCF and MCDC do not adequately maintain a reliable and verifiable audit trail of who was assigned keys, when and which keys were received, and when they were returned.

The current DOCR Information Technology (IT) manager explained that MCCF and MCDC used older versions of key control software that did not automatically archive data beyond a narrow window.⁶ She stated that the MCCF and MCDC shift commander prints a daily key watch audit user report⁷ that is retained, but we found that those reports did not include key return

⁵ The U.S. Department of Justice, National Institute of Corrections (DOJ/NIC) provides guidance to jail officials intended to improve jail safety and security and promote the development of implementation of continuous safety and security improvement and practices.

⁶ The MCCF system was last updated in 2003 and the MCDC system was last updated in 2008.

⁷ The only reports that the OIG received covering the entire sample period were entitled *Live Key in Use/Overdue Report*, or similar. We concluded these were likely the daily key watch audit user reports referred to by the DOCR IT manager.

information. The PRC system on the other hand, was updated in 2017 and is configured so data is available, easily retrievable, and archiving is automatic and ongoing.

The DOCR Key Control Supervisor described the MCCF key control system as particularly concerning because it was not working properly, was obsolete, and had not been updated since the facility opened in 2003. He also explained that parts were no longer manufactured for the version employed by MCCF and therefore repairs were difficult. The Key Control Supervisor expressed his frustration with the repeated delays with the installation of a new key control system that was purchased for MCCF in late 2018.⁸

The Key Control Supervisor stated he believed that the MCDC system worked well. However, when he tried to pull records pursuant to the OIG request, the data was not there, and he could not explain why the data was missing.

Recommendation 1

- a) All DOCR key control systems should be regularly evaluated and updated, as the tracking of correctional facility keys is a principal component of correctional facility security and accountability.
- b) DOCR should evaluate the key control system used by MCDC and ensure that it is reliable and capable of maintaining a verifiable audit trail of who was assigned keys, when and which keys were received and returned.

Finding 2: DOCR spent over \$57,000 on a new key control system for MCCF without first arranging for appropriate resources to ensure timely installation of the system.

In October 2018, DOCR entered into a contract to purchase a new key control system for MCCF for \$58,600.⁹ On March 7, 2019, a memorandum was sent to all DOCR staff¹⁰ informing them that the former DOCR Director had purchased new key control cabinets “so that [DOCR] facilities may remain innovative and up to date regarding technology for Key Management.” The memorandum also stated that planning and installation would “begin in the upcoming weeks” and described the new system as an essential tool to secure and safeguard keys. The system still had not been implemented as of the end of our field work in January 2020.

Multiple DOCR staff members involved in the purchase and implementation of the new system agreed that a requirement that the system reside on a County server significantly contributed to the delay in implementation.¹¹ It appears that DOCR did not adequately address the

⁸ DOCR approved payment of an invoice dated December 1, 2018 for the purchase of the system.

⁹ In December 2018, DOCR disbursed \$57,795 for the purchase of the new system. At the time of our review, an additional \$875 in contract funds remained to address any post installation issues.

¹⁰ The memorandum dated March 6, 2019 was emailed on behalf of the former DOCR Director to the #DOCR.ALL email group on March 7, 2019.

¹¹ While the 2003 system was developed in Microsoft Access, the newly purchased system is developed in SQL and thus requires server space.

technical requirements of the new system prior to its purchase in late 2018 or take timely action to resolve the issues after purchasing the system.

Emails reviewed by the OIG show that during the project planning phase in late 2017, the former DOCR IT manager consulted with the vendor to clarify the technical requirements of the new system. Subsequently, a number of DOCR managers and the former DOCR Director were informed that DOCR would need a server space in order to implement the new system. The former DOCR Director placed the project on hold in late 2017 because of budget cuts, but the former DOCR IT Manager was asked to continue to work with DTS to negotiate for the use of one of their servers if the project moved forward. In the intervening time, the former DOCR IT Manager left County government.¹²

DOCR management again became aware that a server would be required to implement the new system in March 2019. At that time, the current DOCR IT manager learned that her predecessor had not secured a server from DTS.

The implementation of the system was again put on hold in May 2019.¹³ In the fall of 2019, the project was rekindled, and the current DOCR IT Manager reportedly discussed system requirements with the vendor, County DTS, and the Key Control Supervisor. However, it does not appear that DOCR formally requested DTS provide a server to install the new system until October 22, 2019, almost two years after the need for the server was first discussed.

These delays created security vulnerabilities and led to the potential waste of County resources. Not only has DOCR's \$57,000 investment sat idle for over a year, but with the continued passage of time the associated software could become obsolete and no longer be able to address the vulnerabilities for which it was purchased.

Recommendation 2

- a) **DOCR should implement the new MCCF key control system as soon as possible.**
- b) **As future upgrades to DOCR technology are contemplated, DOCR should ensure that system requirements can be met and resources are available for timely installation, prior to making a purchase.**

¹² The former DOCR IT Manager left County government in late 2018 and was subsequently replaced with the current DOCR IT Manager.

¹³ This delay is attributed to the pending implementation of another critical IT system at DOCR.

Telestaff

The County dedicated approximately \$200,000 for the purchase of the DOCR Telestaff scheduling system which was implemented in the fall of 2018. The DOCR Director and current DOCR IT manager confirmed that while much of DOCR is using the Telestaff system, it had not been implemented in FSD.

Finding 3: The DOCR Food Service Department failed to implement the Telestaff automated scheduling system and experienced significant problems as a result of its use of a paper scheduling system.

FSD's persistent reliance on a paper scheduling system has been the source of continued complaints from DOCR staff. Throughout the course of our review, we consistently heard that the former Food Service Manager routinely revised MCCF schedules without adequately communicating revisions to relevant staff and resisted implementing the basic control of signing and dating schedule revisions. Scheduling issues appear to be further compounded by staff perceptions that the former Food Service Manager favored certain MCCF staff members and regularly adjusted schedules to benefit favored employees. Complainants also reported that the MCCF kitchen did not always adhere to a posted schedule, and there was confusion regarding who is expected to report to work and when. FSD supervisors indicated that under the current scheduling system, holding employees accountable to the schedule was a problem.

Because the FSD contributes to the health and well-being of correctional facility staff and residents and routinely operates at minimum staffing levels, effectively managing employee schedules is particularly vital. An unexpected absence, misunderstanding concerning the schedule, or a similar event resulting in a lack of shift coverage may lead to staff being unexpectedly called into work or asked to work longer hours. According to DOCR policy, staff members may be disciplined for refusing to work longer hours or come in on a day off to meet minimum shift requirements.¹⁴ Schedule mishaps and changes can quickly decrease the morale and effectiveness of FSD employees.

The County contract administrator for Telestaff¹⁵ was not aware of any specific issue with Telestaff that would have prevented implementation by FSD. Key DOCR employees, supervisors, and a County manager attributed the lack of implementation to resistance from the former Food Service Manager. During an interview with OIG staff just before her departure

¹⁴ According to the *Minimum Shift Requirements* policy, staff who refuse a direct order to report to or remain over for duty to meet a minimum staffing requirement for their shift will be subject to disciplinary action. The scope of our review did not include an analysis of whether or how often staff members were disciplined under this policy.

¹⁵ Kronos owns the Telestaff automated scheduling system. We discussed Telestaff functionality with the County's Kronos contract administrator.

from DOCR, the former Food Service Manager validated that she was reluctant to implement Telestaff.

The current DOCR IT Manager described a number of Telestaff features that could alleviate scheduling issues in the FSD. Specifically, the system is highly configurable and could be adjusted based on the rules and needs of the FSD. Both employee schedules and leave approvals can be processed through Telestaff, and tardy employees would be required to log into Telestaff and put in a leave request. Managers can see rosters for each facility, and an interface could be configured wherein staff can see who is expected to relieve them at the end of their shift. Overtime rules can also be programmed into the system, providing for the automatic assignment of overtime based on criteria set by the using department. The system is transparent, equitable, and retains an audit trail.

Recommendation 3

The DOCR Food Service Department should implement the Telestaff scheduling system to alleviate confusion with schedules, improve accountability, ensure transparency, and lessen miscommunication with staff.

OIG COMMENTS TO CAO RESPONSE

The County Chief Administrative Officer's response to our report is included in its entirety in Appendix A. The response notes concurrence with each of the OIG's recommendations. Nothing in the response caused us to alter our report.

Additionally, there are aspects of the response that we believe will require further monitoring and detail. We expect specifics of stated actions and plans to be included in the Internal Auditor's fiscal year 2021 annual report in accordance with County Code §2-25A (Council Bill 11-19).

APPENDIX A: CHIEF ADMINISTRATIVE OFFICER (CAO) RESPONSE



Marc Elnich
County Executive

OFFICE OF THE COUNTY EXECUTIVE

Andrew W. Kleine
Chief Administrative Officer

MEMORANDUM

July 21, 2020

TO: Megan Davey Limarzi
Inspector General

FROM: Andrew W. Kleine *AWK*
Chief Administrative Officer

SUBJECT: Response to Confidential Final Draft Report, *DOCR Key Control and Scheduling Systems Have Yet to be Implemented*, OIG Publication # OIG-21-001

Thank you for your July 8, 2020, memorandum forwarding the confidential draft report, *DOCR Key Control and Scheduling Systems Have Yet to be Implemented*, OIG Publication #OIG-21-001. DOCR recognizes the importance of maintaining reliable key control systems and the need to implement Telestaff for all DOCR employees.

Recommendation 1(a): All DOCR key control systems should be regularly evaluated and updated, as the tracking of correctional facility keys is a principal component of correctional facility security and accountability.

CAO Response: We concur with the recommendation that regular evaluations should occur of all DOCR key control systems for functionality. The new key control system for MCCF, once implemented, will utilize the latest version of the software (2019). For the systems at PRC (2017) and MCDC (2008), the department will seek industry standard recommendations for key control system upgrades and submit as part of future budget needs.

Recommendation 1(b): DOCR should evaluate the key control system used by MCDC and ensure that it is reliable and capable of maintaining a verifiable audit trail of who was assigned keys, when and which keys were received and returned.

CAO Response: We concur with the recommendation and have requested DOCR to evaluate the key control system at MCDC to determine if a key box and/or software upgrade is needed. The department will evaluate the feasibility of funding for any recommended system upgrades as part of future budget needs.

Recommendation 2(a): DOCR should implement the new MCCF key control system as soon as possible.

CAO Response: We concur with the recommendation; the timeline for implementation of this new system was delayed due to the COVID-19 emergency. The MCCF Key Watch Project was initiated on October 22, 2019 and is being coordinated with the Department of Technology Services (DTS) and the vendor. Key components of establishing a separate SQL Server for system data that is connected to the County server, software installation, and system configuration have been completed. The project is scheduled for completion by September 2020.

Recommendation 2(b): As future upgrades to DOCR technology are contemplated, DOCR should ensure that system requirements can be met and resources are available for timely installation, prior to making a purchase.

CAO Response: We concur with the recommendation and have directed DOCR to work with DTS to ensure that future contemplated system upgrades are appropriately planned and resourced prior to making system purchases.

Recommendation 3: The DOCR Food Services Division should implement the Telestaff scheduling system to alleviate confusion with schedules, improve accountability, ensure transparency, and lessen miscommunication with staff.

CAO Response: We concur with this recommendation; the timeline for completion of this project was interrupted due to the COVID-19 emergency. Implementation of the Telestaff scheduling system at the Food Services Division is currently scheduled to be completed by the end of August 2020.

I appreciate the work conducted by your office and for bringing these matters to my attention.

Cc: Fariba Kassiri, Deputy Chief Administrative Officer
Angela Talley, Director, Department of Corrections and Rehabilitation
Gail Roper, Director, Department of Technology Services
Frank da Rosa, Deputy Inspector General
Bill Broglie, Internal Audit Manager, Office of the County Executive

