



Seattle Office of Police Accountability

November 7, 2025

Chief Shon F. Barnes
Seattle Police Department
PO Box 34986
Seattle, WA 98124-4986

Dear Chief Barnes:

Please see the Management Action Recommendation below.

Case Number

- 2025OPA-0152 / 2025COMP-0016

Topic

- Employee Timekeeping and Overtime Tracking

Summary

- A complainant alleged two named employees submitted inaccurate overtime records resulting in the named employees being paid overtime for hours they did not work.

Analysis

- [SPD Policy 5.001-POL-2](#) requires employees to, “adhere to laws, city policy and department policy.” This includes federal, state, and city laws as well as city policy, department policy, published directives and special orders, and applicable collective bargaining agreements and labor law. *Id.*
- Department policy, city policy, and the SPOG collective bargaining agreement all require that employees be paid for overtime that is actually “worked.”¹
- OPA sustained allegations against one named employee after finding his inaccurate submissions resulted in him being paid overtime for unworked hours. OPA noted potential discrepancies for a second named employee but, due to their shorter lengths, could not find that such discrepancies indicated overtime pay for unworked hours.
- OPA noted that, because SPD lacks a contemporaneous time-keeping system—such as a time clock—it had to corroborate the named employees work time using systems with non-timekeeping purposes, such as the computer-aided dispatch system (CAD) and facility access proximity card records. These are imperfect tools for corroborating employee work times.

¹ See SPD Policies 4.020-POL-1(2) (“Employees Require Pre-Approval from a Supervisor to Work Overtime”), 4.020-POL-1(6) (“Employees Are Compensated for Authorized Overtime Worked”), and 4.020-POL-1(10) (“Employees report overtime worked on the appropriate form.”); City Personnel Rules 3.6.4 Rate of Compensation (“Hourly employees will be compensated at the rate of 1½ times their regular rate of pay for all hours and fractions of hours worked beyond the overtime threshold in a workweek for ordinary overtime.”) and 9.1.9 Overtime (“Hourly employees are eligible to receive overtime compensation for all hours worked beyond the overtime threshold in a work week.”); SPOG CBA Article 5.4 Overtime (“Employees on the nine (9) hour day schedule shall be paid at the rate of time and one-half (1 1/2) for all hours worked in excess of nine (9) in one (1) day and for all hours worked on a scheduled furlough day.”).



- Over the past several years, OPA has issued management action recommendations to SPD concerning the need to improve their time tracking systems, particularly with respect to overtime.²
- On September 20, 2024, OPA recommended SPD “consider developing an overtime tracking system that accurately monitors hours worked across SPD.”³ On November 21, 2024, SPD declined, writing, “given the citywide operational issues with workday, it is not feasible to implement a new OT [overtime] tracking system at this time.”⁴

Recommendations

- SPD should consider refining its policies and procedures to prohibit pre-filling overtime request forms and requiring supervisors to approve overtime hours for actual time worked at the end of the shift.
- Consider allocating the responsibility for overtime management to a department-wide entity, such as the Seattle Police Operations Center or Human Resources.
- Review different technological systems for employees to “clock in” and “clock out” to more accurately create contemporaneous records of regular and overtime hours.
- Reconcile any conflicts between bargaining agreements with any changes to SPD policy and negotiate any changes that would be mandatory subjects of bargaining.

I appreciate your consideration and look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie J. Glenn".

Bonnie J. Glenn
Interim Director, Office of Police Accountability

² See [2019OPA-0034 / 2020COMP-0004](#), [2020OPA-0511 / 2021COMP-0030](#), [2021OPA-0437 / 2022COMP-0011](#), and [2023OPA-0523 / 2024COMP-0007](#).

³ See [2023OPA-0523 / 2024COMP-0007](#).

⁴ See [SPD's response to 2024COMP-0007](#)