



INSPECTOR GENERAL

**U.S. FEDERAL LABOR RELATIONS AUTHORITY  
OFFICE OF INSPECTOR GENERAL**

**Management Advisory Review of  
the Variable Week Work  
Schedule Program**

**Report No. MAR-26-01**

**January 13, 2026**

**Federal Labor Relations Authority  
Office of Inspector General  
1400 K Street, NW 3<sup>rd</sup> Floor  
Washington, D.C. 20424**

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### Acronyms

AWS	Alternative Work Schedule
C.F.R.	Code of Federal Regulations
CWS	Compressed Work Schedule
FLRA	Federal Labor Relations Authority
HRD	Human Resources Division
OIG	Office of Inspector General
OPM	Office of Personnel Management
U.S.C.	United States Code
WSSF	Work Schedule Selection Form

The Honorable Colleen Duffy Kiko  
Chairman

The Federal Labor Relations Authority (FLRA) Office of Inspector General (OIG) performed a management advisory review of FLRA's administration and implementation of the variable week work schedule program. The variable week work schedule is an Alternative Work Schedule (AWS) that is available to FLRA employees. The objective of this review was to determine whether FLRA's policy regarding the use of the AWS variable week work schedule option was adequate to ensure that employees work the required number of hours in a pay period. Our work was limited to reviewing policies, procedures, administration, and implementation of the variable week work schedule for the period of February 23, 2025, through July 31, 2025.

## **Results in Brief**

During our review of employees who have elected to work a variable week work schedule, we found that FLRA has not fully implemented or enforced its AWS policy. Employees who work the variable week work schedules are required by FLRA's AWS policy to enter their arrival and departure times in FLRA's automated time and attendance system. We found that FLRA does not, in practice, require employees who work a variable week work schedule to do so. Additionally, we found that FLRA has limited methods to independently validate and verify time worked by employees who work a variable week work schedule when a need or situation arises. Furthermore, we noted FLRA should update its Work Schedule Selection Form (WSSF) to include the appropriate flexible schedule options.

We believe that FLRA can significantly mitigate the risks associated with the variable week work schedule program by addressing these findings. We made five recommendations for management's consideration. On September 9, 2025, we provided a draft of this report to FLRA for its review and comment on the findings and recommendations. In response to recommendation 1, management noted that the Quicktime system has limitations in recording employees' daily arrival and departure times. We concurred and decided to close this recommendation. Regarding recommendation 3, management indicated that the implementation of scanning the key fob across the agency is not feasible due to differing technological security limitations. We agreed and have closed recommendation 3. We intend to follow up on the remaining three recommendations.

## **Background**

FLRA has established the use of AWS, and specifically, the variable week work schedule, under 5 U.S.C. chapter 61 (5 U.S.C. §§ 6101-6133).<sup>1</sup> The AWS was established to provide Federal employees flexible and compressed work schedules to improve productivity and to better recruit

<sup>1</sup> Implementing regulations are at 5 C.F.R. part 610 (5 C.F.R. §§ 610.101-610.408).

and retain the Federal workforce. The Office of Personnel Management (OPM) has published guidance in its Handbook on Alternative Work Schedules.<sup>2</sup>

FLRA's current policy *Alternative Work Schedules*, Policy No. 3640.2, became effective November 6, 2023. Employees make their schedule selection on the FLRA's WSSF. The form requires supervisory approval and the forms are forwarded to the FLRA Human Resources Division (HRD) to be entered into the timekeeping system and for record keeping purposes.

FLRA provides the following options for work schedules in the policy:

### **Fixed Work Schedules**

1. Compressed Work Schedule (CWS). A CWS meets the basic work requirement of 80 hours in less than 10 work days. Arrival and departure times and non-workdays are fixed. Employees may select one of two CWS options:
  - 5-4/9 Plan: Employee works 8 9-hour days and 1 8-hour day each pay period. This schedule provides a regular day off during each pay period.
  - 4/10 Plan. Employee works 4 10-hour days each workweek. This provides a regular day off each week.
2. Fixed Hour Work Schedule. This is exemplified by a fixed work schedule of 8 hours per day, 40 hours per week. Arrival times need to be uniform through each week.

### **Flexible Work Schedules**

1. Gliding Work Schedule. A type of flexible work schedule in which a full-time employee has a basic work requirement of 8 hours in each day and 40 hours in each week, may select a starting and stopping time each day, and may change starting and stopping times daily within the established flexible time band.
2. Variable Week Work Schedule. A type of flexible work schedule containing core hours on each workday in the biweekly pay period and in which a full-time employee has a basic work requirement of 80 hours for the biweekly pay period, but in which an employee may vary the number of hours worked on a given workday. The employee must be present during the established core hours of 11:30 am to 1:30 pm, may work up to a maximum of 12 hours in a day, start as early as 5 am, and work as late as 10 pm.

## **Report Findings**

We found FLRA's policies and procedures are largely adequate and in agreement with the statutory and regulatory requirements and OPM guidelines. However, we found that FLRA had not followed or enforced its AWS policy requirements.

### **A. Alternative Work Schedules Policy No. 3640.2 – Requirements Not Followed**

We found that FLRA did not follow certain of the requirements in FLRA Policy No. 3640.2, *Alternative Work Schedules* (Nov. 6, 2023) ("AWS policy"). The policy requires employees to submit a WSSF to their supervisor for approval. After approval, the form is sent to the HRD for

<sup>2</sup> OPM, Handbook on Alternative Work Schedules, <https://www.opm.gov/policy-data-oversight/pay-leave/reference-materials/handbooks/alternative-work-schedules/> (last visited September 18, 2025).

processing. We requested and received WSSFs for every employee assigned to an FLRA office located at 1400 K Street, NW, Washington, D.C. (FLRA headquarters). This included all employees at headquarters and in the Washington Regional Office. We identified 39 of 60 employees who elected to work the variable week work schedule. This represents 65 percent of employees.

Section D.1.b. of the AWS policy states the following: “Use of FLRA automated time and attendance system. Employees must enter their arrival and departure times on the FLRA automated time and attendance system.”<sup>3</sup>

These requirements conform with OPM and FLRA’s general requirements that employees are to account for all hours worked and that supervisors are to ensure and verify that employees have worked their required hours. FLRA uses the Interior Business Center’s Quicktime time and attendance system. Within Quicktime, FLRA employees can simply record the number of daily hours worked or use the time sign-in and sign-out option to record their arrival and departure times. This latter option can only be activated by the HRD.

The key feature of the variable week work schedule is that it permits employees to vary their start and stop times *each day*. Without a daily record of arrival and departure times, there exists a risk that employees who vary their start and stop times may struggle to accurately recall the hours worked when validating their time card for a biweekly pay period. In our survey to FLRA supervisors, most supervisors stated that their employees do not vary their arrival and departure times when asked about any additional steps taken to ensure the accuracy of reported work hours. Supervisors indicated that since most employees keep a fairly consistent schedule with slight variations; therefore, they were able to easily observe and note the presence of their employees, ensuring they were generally present for the hours reported on their timecards. While this is one approach to monitoring time and attendance that provides some assurance that significant over-reporting of work hours is not occurring, there remains a risk that employees may inaccurately report their work hours without a daily log or record of small variation in start and stop times.

We believe that employees who significantly vary their work schedules are more likely to recall such variations when filling out their timecards, while they are less likely to recall smaller variations. Remembering smaller variations of an hour or less in arrival and departure times from day-to-day is more challenging, thereby increasing the risk of inaccurately reporting work hours. This risk can be eliminated by strictly enforcing the policy requirement that employees on a variable week work schedule utilize the sign-in and sign-out feature in the Quicktime system to document their daily arrival and departure times. FLRA and employees should implement this practice on a daily basis. Our review found that only 3 of the 39 employees actually use the sign-in and sign-out feature in Quicktime.

<sup>3</sup> See also 5 C.F.R. § 610.404 (“An agency that authorizes a flexible work schedule or a compressed work schedule under this subpart shall establish a time-accounting method that will provide affirmative evidence that each employee subject to the schedule has worked the proper number of hours in a biweekly pay period.”); OPM, Handbook on Alternative Work Schedules (“When a supervisor cannot approve from personal knowledge the entitlement to pay for an employee on an alternative work schedule, there are a number of time accounting options available that may be used to ensure adequate controls. Examples are provided ... below.”).

## **Recommendations:**

We recommend that the Director of the HRD:

1. Require employees who have opted and been approved to work a variable week work schedule to enter their arrival and departure times into the Quicktime system to record their daily arrival and departure times as required by FLRA policy.
2. Establish procedures to monitor compliance with FLRA's Alternative Work Schedules policy.

## **Management Response:**

Recommendation 1: In its January 9, 2026, response, FLRA indicated that the Quicktime system has certain limitations that prevent some employees from recording their daily arrival and departure times. The FLRA is scheduled to transition to a new time and attendance system in the next fiscal year and will explore the functionality of the new system to track time in and time out.

In the interim, FLRA intends to implement compensating controls outside of the system by directing each manager or supervisor to implement their own method for ensuring timekeeping accuracy. To further respond to both recommendations, FLRA plans to develop additional guidance and provide training to supervisors and managers.

Recommendation 2: In its January 9, 2026, response, FLRA agreed to develop guidance and provide training to supervisors.

Management response can be found in Appendix 2.

## **OIG Reply:**

We concur with this assessment and closed recommendation 1.

We consider management's response to recommendation 2 adequate and intend to conduct a follow-up to ensure that FLRA explores the functionality of tracking time in and time out in their new time and attendance system and establishes procedures to monitor compliance.

### **B. Supervisors Not Able to Independently Verify Hours Worked**

Timesheet certifiers, typically supervisors, are accountable and responsible for ensuring employees accurately report their timesheets. Supervisors who certify employee timesheets did not require their employees to enter their arrival and departure times in the agency's Quicktime system (or another informal system). Consequently, the supervisors lack the essential documentation required prior to certifying employees' timesheets.

The FLRA AWS policy, at section A.6.b. states that "[s]upervisors are responsible for monitoring the work hours of subordinates and for ensuring compliance with AWS program policy." Further, the FLRA AWS policy, at section C, states: "**DOCUMENTATION / RECORD MAINTENANCE.** ... The supervisor shall maintain a record of any documentation

that the supervisor believes is necessary to support the employee's time and attendance under an AWS and to provide an adequate 'audit trail' for any review of the AWS program that is appropriate."

FLRA uses electronic key fobs for employees to access the headquarters building and the FLRA office space. Fob scanners are located on the elevators and at various other access points within and outside the building. Employees are required to scan their key fob to operate the elevator and unlock the doors to gain access to the FLRA offices at all times. Additionally, a fob scanner is located at both stairways, and employees must scan their fob to unlock and open the doors for accessing FLRA space from the stairways. Employees are not required to scan the fob at any point to exit the office or building.

A part of the objectives of our review was to analyze data for any potential abuse of time and attendance. We obtained timecard data from Quicktime to review time logs, and also requested and received the security logs pertaining to employee fob scans.

As stated above, only 3 of the 39 employees who worked a variable week work schedule used the sign-in and sign-out feature in Quicktime. We were able to verify the recorded arrival times for these three individuals using the fob security logs; however, since there is no requirement for an employee to scan their key fob upon exiting the FLRA space, it is impossible to verify or validate any recorded departure times. Without a final fob scan at the end of the day it is not possible to determine the hours worked based on any authoritative data, such as the security logs.

While we do not believe a supervisor or a certifier needs to validate arrival and departure times every pay period when certifying timecards, we believe it is implicit in OPM guidance and FLRA policy that supervisors have the ability to do so when a situation or a need arises.

### **Recommendations:**

To improve oversight capabilities and documentation within HRD, we recommend that the Director of the HRD:

3. Review the feasibility and determine whether employees should be required to scan their key fob to record final departure time at the end of the work day.
4. Provide training to all employees (which includes supervisors) on all available alternative work schedules. This training should be provided to all new employees during employee orientation and to all employees whenever significant changes to the policy occur.

### **Management Response:**

Recommendation 3: In its January 9, 2026, response, FLRA has determined that scanning employee key fobs upon entry and exit is not feasible due to varying technological security limitations agencywide. Regional offices do not enable uniform key fob usage agencywide.

Recommendation 4: In its January 9, 2026, response, FLRA agreed to provide AWS refresher training to all employees. Management response can be found in Appendix 2.

### **OIG Reply:**

Management noted that implementing scanning the key fob agencywide is not feasible because of varying technological security limitation. We concur and close this recommendation.

We consider management's response to recommendation 4 adequate and plan to conduct a follow-up to ensure that FLRA provides training to all employees on the available alternative work schedules.

### **C. Revision Needed to the WSSF**

FLRA employees wanting to work a flexible work schedule must submit the WSSF. This form includes two types of flexible work schedules, only one of which is actually offered by FLRA (i.e., Gliding Work Schedule). FLRA's AWS policy offers two flexible work schedules: 1. Gliding Work Schedule; and 2. Variable *Week* Work Schedule. However, the FLRA WSSF has two flexible schedule options from which employees may choose: Gliding, and Variable *Day*.

The variable week work schedule and variable day work schedule are two distinct types of schedules defined by the OPM below:

**Variable day schedule** A type of flexible work schedule containing core hours on each workday in the week and in which a full-time employee has a basic work requirement of 40 hours in each week of the biweekly pay period, but in which an employee may vary the number of hours worked on a given workday within the week within the limits established for the organization.

**Variable week schedule** A type of flexible work schedule containing core hours on each workday in the biweekly pay period and in which a full-time employee has a basic work requirement of 80 hours for the biweekly pay period, but in which an employee may vary the number of hours worked on a given workday or the number of hours each week within the limits established for the organization.<sup>4</sup>

### **Recommendation:**

We recommend that the Director of the HRD:

5. Modify the FLRA Policy No. 3640.2 Work Schedule Selection Form to the correct flexible schedule options that employees may choose.

### **Management Response:**

In its January 9, 2026, response, FLRA agreed to update their policy.

### **OIG Reply:**

We consider management's response adequate and plan to conduct a follow-up to ensure FLRA modifies the FLRA Work Schedule Selection form.

<sup>4</sup> OPM, Handbook on Alternative Work Schedules.



## **Appendix 1: Objectives, Scope, and Methodology**

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The objective of this review was to determine whether FLRA’s policy regarding the use of the AWS variable week work schedule option was adequate to ensure that employees work the required number of hours in a pay period. An entrance conference was held with the Executive Director and the Director of HRD on June 3, 2025. Our fieldwork was conducted June 3, 2025, through August 15, 2025.

We reviewed WSSFs for employees at 1400 K Street, NW, Washington, D.C. We cross-referenced the WSSFs to Quicktime for verification. We identified 39 employees who had selected the variable week work schedule AWS option during the period of February 23, 2025, through July 31, 2025. Employees who may have worked a variable week schedule, but left before July 31, 2025, are not included in the 39 employees.

We met with the Executive Director and the Director of HRD. We conducted a survey of most supervisors located at headquarters who had employees who worked the variable week work schedule. We compared FLRA Policy No. 3460.2 to the data and responses we received during our review to arrive at our findings, conclusions, and recommendations. We documented all the review activity and provided a draft report to management for their review and comments.

## Appendix 2: Management Response

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UNITED STATES OF AMERICA  
**FEDERAL LABOR RELATIONS AUTHORITY**

January 9, 2026

### **MEMORANDUM**

TO: Dana Rooney, Inspector General

FROM: Joseph Panteloglous, Director of Human Resources Division

THROUGH: Michael Jeffries, Executive Director 

SUBJECT: Management Response to Management Advisory Review of the Variable Week Work Schedule Program

Thank you for the opportunity to review and provide comments on the Office of Inspector General's (OIG) draft Management Advisory Review of the Variable Week Work Schedule Program.

The Federal Labor Relations Authority (FLRA) appreciates the in-depth review of our variable week work schedule program. While we have provided responses below to the three report findings and recommendations, we want to bring to your attention that the Agency is in the process of finalizing an updated AWS policy. It is our belief that with this updated policy, we will address or remedy many of the findings.

While we anticipate that the issuance of a new policy will effectively address the recommendations, the Agency will implement adaptational measures to address the recommendations outside of the policy in the form of guidance and training.

#### **Report Finding A. Alternative Work Schedules Policy No. 3640.2 – Requirements Not Followed:**

##### **Recommendations:**

1. Require employees who have opted and been approved to work a variable week work schedule to enter their arrival and departure times into the QuickTime system to record their daily arrival and departure times as required by FLRA policy.
2. Establish procedures to monitor compliance with FLRA's Alternative Work Schedules policy.

##### **Agency Response:**

As the OIG report identifies, most employees working a variable workweek schedule do not use QuickTime to record their daily arrival and departure times. Unfortunately, QuickTime has limitations that prevent some employees from effectively using it in that manner. However, the Agency is scheduled to transition to a new time and attendance system next fiscal year. As part of that transition, the Agency will explore the functionality of the new system to track time in and time out in the manner recommended.

In the interim, the Agency plans to update its policy to reflect the current limitations of the time keeping system and to no longer require employees to enter their arrival and departure times in the Agency time and attendance system; rather, employees will be required to record only the time worked. Instead, the Agency plans to direct each manager or supervisor to implement their own method for ensuring timekeeping accuracy, including morning and/or evening check-ins, verbal communication, requiring employees to maintain a written log, or other appropriate means.

This approach provides flexibility while promoting accountability and independence, allowing each office to monitor time in and time out in a manner that best supports its operations. For example, many offices are small, enabling supervisors to more easily exercise daily oversight over employees and further reducing ambiguity regarding staff schedules. Additionally, many employees identified in the system as working a variable workweek schedule are actually working standard fixed hours for the majority of work weeks, with flexibility to adjust if needed. This reduces the need for more detailed tracking.

To further address both recommendations, the Agency will develop additional guidance and provide training to supervisors. It will also ensure that all managers and supervisors are familiar with the new policy.

## **B. Supervisors Not Able to Independently Verify Hours Worked**

### **Recommendations:**

3. Review the feasibility and determine whether employees should be required to scan their key fob to record final departure time at the end of the work day.
4. Provide training to all employees (which includes supervisors) on all available alternative work schedules. This training should be provided to all new employees during employee orientation and to all employees whenever significant changes to the policy occur.

### **Agency Response:**

While the Agency uses key fobs at its headquarters, the varying technological and security limitations at the regional offices do not enable uniform key fob use agencywide. For this reason, the Agency does not consider scanning employee key fobs upon entrance and exit to be a viable agencywide solution. However, it is feasible for the Agency to use a variety of “spot check” auditing techniques to verify time and attendance, including fob data, computer logins, email logs, and MS Teams activity logs.

As stated above, the Agency will ensure all managers, supervisors, and employees are aware of the new policy and are given AWS refresher training.

## **C. Revision Needed to the WSSF**

### **Recommendations:**

5. Modify the FLRA Policy No. 3640.2 Work Schedule Selection Form to the correct flexible schedule options that employees may choose.

### **Agency Response:**

This will be addressed in the updated policy.

## **Appendix 3: Report Distribution**

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### **Federal Labor Relations Authority**

The Honorable Anne M. Wagner, Member  
The Honorable Charles Arrington  
Executive Director  
Human Resources Division Director



INSPECTOR GENERAL

# Contacting the Office of Inspector General

If you know of fraud, waste, abuse, or misconduct relating to an FLRA program, contract, or employee, you may report it to the FLRA OIG Hotline:

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**[HTTP://WWW.FLRA.GOV/OIG-HOTLINE](http://www.flra.gov/oig-hotline)**

CALL: (771) 444-5712 FAX: (202) 208-4535

WRITE: 1400 K Street, NW, 3<sup>rd</sup> Floor

Washington, D.C. 20424

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