



STATE OF WASHINGTON

OFFICE OF FINANCIAL MANAGEMENT

Insurance Building, PO Box 43113 • Olympia, Washington 98504-3113 • (360) 902-0555

December 17, 2024

Honorable Pat McCarthy
Washington State Auditor
P.O. Box 40021
Olympia, WA 98504-0021

Dear Auditor McCarthy:

The Office of Financial Management appreciates the State Auditor's Office (SAO) work on the *Reducing the Risk of Inappropriate Dual Payroll Payments* performance audit. We would like to make a distinction between remote work and dual employment because the report seems to combine the two concepts.

The ability for eligible positions and staff to work remotely is a vital element in the modern workforce and culture. During the pandemic, remote work enabled state agencies to continue providing critical services while maintaining a functional government.

Dual employment refers to a situation where an individual holds two or more jobs simultaneously. It has become a normal part of the modern workforce, as it offers employees opportunities to gain more skills and earn more income in today's high-cost living environment. Additionally, as the gig economy grows, the abundance of platform-based employment opportunities continues to appeal to workers seeking flexible and multiple streams of earning.

Although this is an important and evolving issue, we want the reader to understand that dual employment is fairly uncommon among state employees. The audit identified 93 employees with an overlap in payments, and did not identify any inappropriate payments. Of more than 75,000 general government state employees, 93 employees represent 0.124% of the state workforce. This data suggests employees are using this type of employment judiciously and agencies are managing it appropriately.

Regarding the audit recommendations, we disagree with the first recommendation about OFM providing additional guidance around dual-employed workers. The core tenet of this issue is related to employee ethics, which is governed by the Executive Ethics Board (EEB). OFM believes that SAO should work with the EEB and the Attorney General's Office to address the ethics, legal issues, and responsibilities of agencies in monitoring dual employment.

OFM agrees with the second and third recommendations and will work with agencies to address them during the configuration of Workday, the state's enterprise resource and planning (ERP) system.

Sincerely,

Pat Sullivan
Director

cc: Joby Shimomura, Chief of Staff, Office of the Governor
Kelly Wicker, Deputy Chief of Staff, Office of the Governor
Rob Duff, Executive Director of Policy and Outreach, Office of the Governor
Mandeep Kaundal, Director, Results Washington, Office of the Governor
Tammy Firkins, Performance Audit Liaison, Results Washington, Office of the Governor
Scott Frank, Director of Performance Audit, Office of the Washington State Auditor
Emily Beck, Deputy Director, Office of Financial Management
Michaela Doelman, Chief Human Resources Officer, Office of Financial Management
Jamie Langford-Herbig, Chief Financial Officer, Office of Financial Management

CABINET RESPONSE TO PERFORMANCE AUDIT ON REDUCING THE RISK OF INAPPROPRIATE DUAL PAYROLL PAYMENTS – DECEMBER 17, 2024

The Office of Financial Management (OFM) provides this management response to the State Auditor's Office (SAO) performance audit report received on November 7, 2024.

SAO PERFORMANCE AUDIT OBJECTIVES

The SAO's performance audit addressed this question:

1. What opportunities exist for state agencies and the Office of Financial Management to prevent inappropriate dual employment payroll payments?
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Recommendations to OFM in brief:

To provide additional guidance around dual-employed workers:

SAO Recommendation 1:

1. Develop and share guidance on key components on dual employment to include in a policy, including:
 - a. Clauses around the use of agency resources for other jobs, conflicts of interest, ensuring other positions cannot impair an employee's performance, and the consequences of violating the policy, as described on page 12
 - b. A process to approve dual employment by both employers, including establishing separate work schedules and requiring reapprovals annually
 - c. A description of relevant state laws, an agency's responsibilities and its ongoing obligations to monitor dual-employed workers.

STATE RESPONSE: OFM disagrees. The core tenet of this issue is related to employee ethics, which is governed by the Executive Ethics Board (EEB). OFM agrees that dual employment should be properly managed at the agency level with sufficient oversight. OFM believes that SAO should work with the EEB and the Attorney General's Office to address the ethics, legal issues, and responsibilities of agencies in monitoring dual employment.

Action Steps and Time Frame

- Not applicable
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SAO Recommendation 2:

2. Disseminate existing instructions to state agencies' human resources departments on how they can run reports of all active dual-employed employees using the Human Resources Management System.

STATE RESPONSE: OFM agrees with the recommendation and will work with payroll and human resources organizations' communities of practice to identify and disseminate the numerous tools available to agency human resource and payroll staff.

Action Steps and Time Frame

- Remind agency human resource and payroll staff of available tools. *By January 31, 2025.*
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SAO Recommendation 3:

3. When developing requirements for the human resources component of Workday, include controls to alert:
 - a. The hiring state agency that the new employee is an active state employee
 - b. The primary state agency that an active employee has been hired at another state agency

STATE RESPONSE: OFM agrees in principle with the recommendation. The Workday software is used throughout the world by governments and the private sector and is the enterprise resource and planning (ERP) system for our state's administrative systems modernization project. The initial requirements for Workday policy alignment documentation, prepared by the system integrator, already address dual employment functionality.

Action Steps and Time Frame

- Complete
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