

REPORT TO THE LEGISLATURE

Individual Provider Overtime Quarterly Expenditures

ESSHB 1725 Section 1(10) passed by 2016 Legislature

December 1, 2016

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1 Executive Summary

This is the second quarterly expenditure report submitted by the Department of Social and Health Services (identified as “the Department” within this report) to meet the requirements outlined in Engrossed Second Substitute House Bill (ESSHB) 1725. It provides data on the overtime hours worked by Individual Providers (IPs) for the reporting period July 1 – September 30, 2016. The key findings include:

- The number of overtime hours claimed by IPs for this period is 7.4%, which is below the limit of 8.75% set forth by ESSHB 1725;
- The number of providers claiming overtime is decreasing;
- Implementation of overtime has required significant adjustments on the part of impacted clients, IPs and staff at the Department and its contractors. The steps taken by those impacted are making a difference in the percentage of overall hours that are attributable to overtime;
- The full impact of the controls won't be visible until early 2017;
- There is very little difference between overtime hours as a percentage of all hours paid compared to overtime hours as a percentage of all hours authorized;
- Overtime hours are being accrued and tracked in the newly-implemented Individual ProviderOne (IPOne) payment system; although some overtime expenditures have occurred, full expenditures will occur later this year after the IPOne system functionality is implemented.

2 Purpose

In accordance with ESSHB 1725 Section 1 and Section 3, the Department is providing this quarterly expenditure report for the time period July through September 2016, the first quarter of state fiscal year 2017. This report includes an overview of the data available, and the required data specified by the legislation, as listed below. Additional information about the Department's implementation of ESSHB 1725 can be found in the IP Overtime Spending Plan submitted to the legislature annually on July 1.

- I. Number of providers receiving payment for more than 40 hours/week
 - a. How many due to meeting conditions of [RCW 74.39A.270](#)* (5)(b)(i)(A), (b)(ii), (b)(iii), and (9)*

- II. Number of hours paid and the amount paid for more than 40 hours in a work week including*:
 - a. Total amounts
 - b. Averages
 - c. Display of the distribution of the amounts

- III. Display data in following divisions:
 - a. Department Region (1, 2 or 3) of client
 - b. County of client
 - c. Department program (AL TSA, DDA)
 - d. Specified for providers by the number of clients they serve

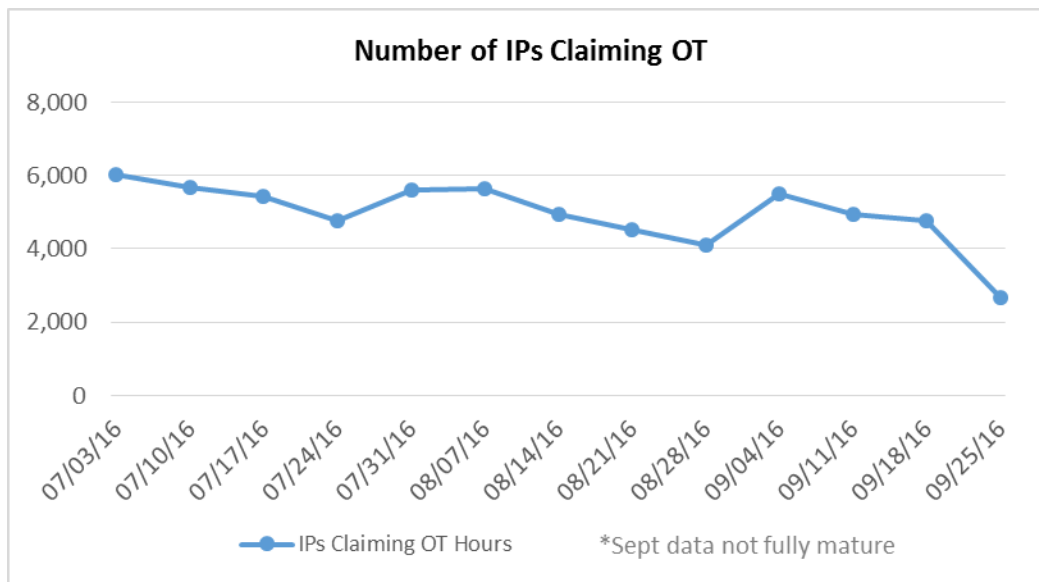
*As the overtime payment functionality is not fully implemented, complete expenditure data is not available. Data for this reporting period is based upon work hours claimed by IPs, not paid hours or expenditures. See [initial data and findings](#) section for additional information.

3 Initial Data and Findings

The data available is for hours worked and reported by IPs in a work week; it does not include actual final expenditure data because overtime payment functionality is only partially implemented at the time of this reporting. Additionally, IPs have up to 13 months to claim payment so even when functionality is fully in place, a portion of IPs receiving overtime payment may not claim it until months later.

The Department implemented a new payment system for IPs in March 2016. IPs began accruing overtime for hours worked over 40 in a work week effective with the first work week in April which began April 3, 2016. The functionality to pay for overtime in the new payment system is being implemented in multiple phases. The first phase was implemented in June 2016, the second phase in November, and remaining system functionality is under development. Overtime hours have been accrued for IPs who worked over forty hours per week since April. Some expenditures have occurred at time and a half wages. Final retroactive payments will not be made until December 2016 when the Individual ProviderOne payment system has the ability to make adjusted back payments.

This report illustrates the overtime data for IPs in both the Aging and Long-Term Support Administration (ALTSA) and Developmental Disabilities Administration (DDA) and shows the overtime hours worked in the reporting period July 1 – September 30, 2016. On average 4,962 IPs have worked overtime during this reporting period. This is down from 5,598 IPs who worked overtime hours during the prior reporting period.

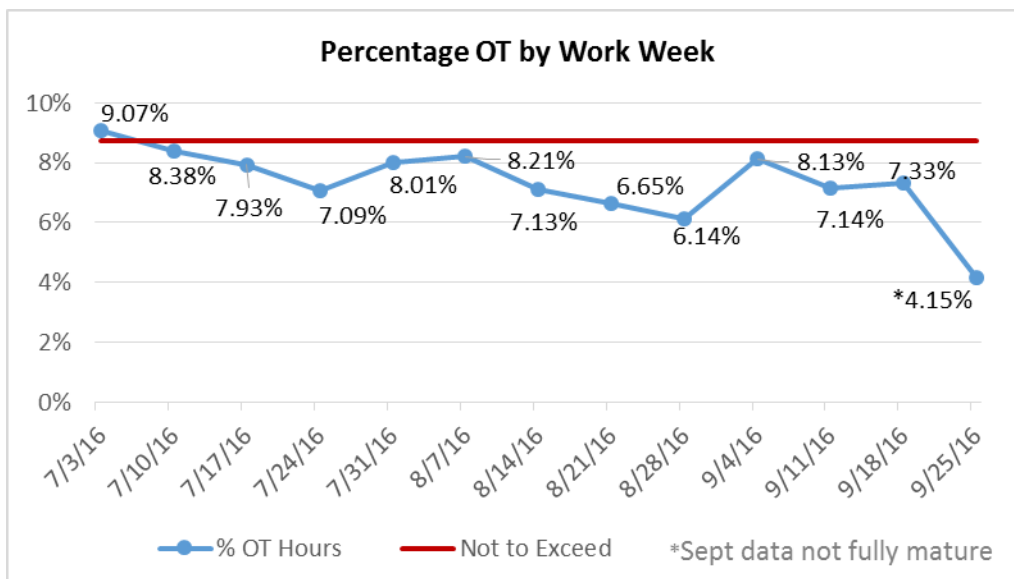


When accrual of overtime payments began, the legislation describing the limits on overtime was not in effect and existing statute prohibited the Department from controlling how consumers chose to assign authorized hours to qualified providers in their plan of care. ESSHB 1725, which established overtime limits, was signed by Governor Inslee on April 18, 2016 and the Department issued emergency rules to implement the statute on April 22, 2016 (Chapter 388-114 WAC). Instructions were also issued to field staff to begin the review of plans of care for the

consumers served by IPs with overtime hours above those permitted in statute, in accordance with ESSHB 1725 (5)(b)(v).

3.1 IP Overtime Hours: AL TSA and DDA combined

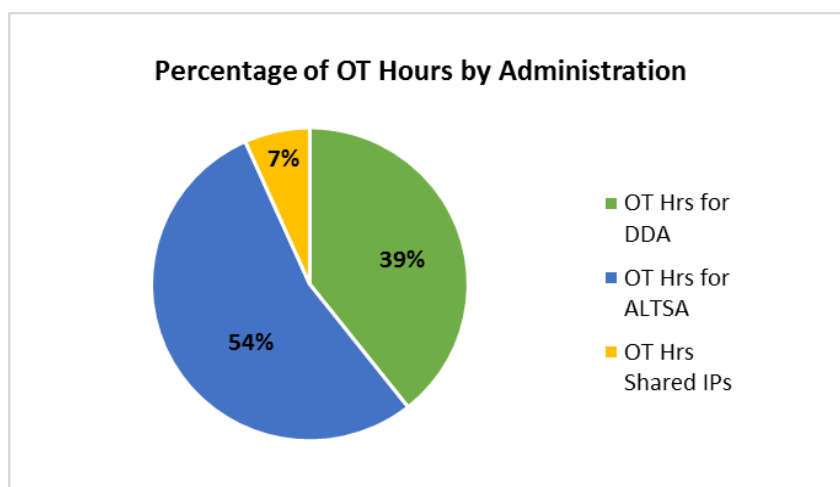
The percentage of overtime hours worked compared to all paid hours for this reporting quarter is 7.4% percent, down from 9.49% for the prior reporting period. The Department has continued implementing requirements outlined in ESSHB 1725, and is putting in place controls to ensure overtime expenditures do not exceed the allowable limit. The chart below illustrates that the percentage of overtime hours claimed each work week has varied slightly from week to week, and how it compares to the 8.75% limit.



Please see [Appendix A](#) for complete data. Please note: The data represented for September, and particularly the last two weeks of September, is not fully mature as of the date of report finalization. Fully mature data is expected to be higher than shown.

3.2 Comparison of IP Overtime by Administration

This quarter's expenditures show, on average, the overtime hours worked by the 4,962 providers are split across DDA and AL TSA at a rate of 39% to 54%, with another 7% of the hours shared by IPs that work for consumers in both administrations (see chart below). This is consistent with the prior quarter's data. Please see [Appendix B](#) for complete data.



4 Work Week Limits and Impact on Overtime Hours

In accordance with ESSHB 1725 (5)(b)(v), the Department established and assigned work week limits to all IPs based upon average hours worked in January 2016. A work week limit is the total number of service hours an IP can provide in a work week. Service hours are paid to an IP to provide personal care, relief care, skills acquisition training, or respite services.

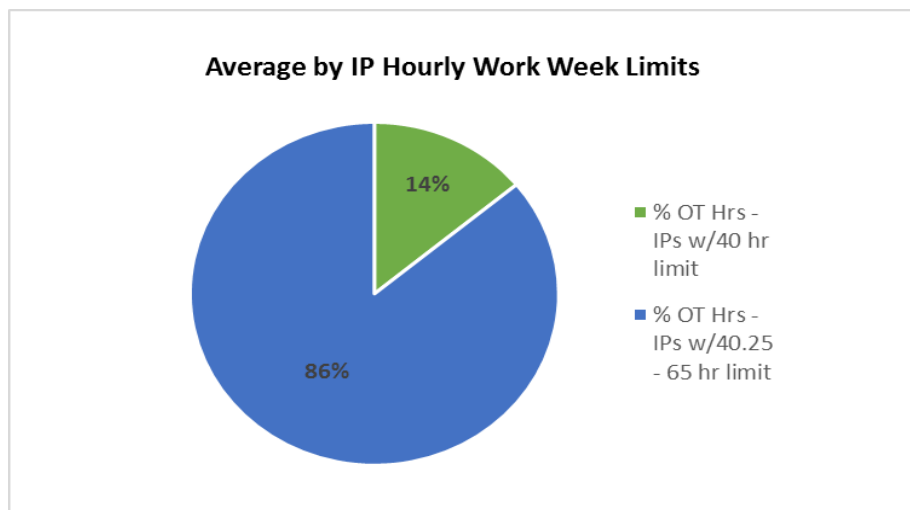
Approved travel time, required training hours and paid time off are not included in an IP's work week limit. The work week limit is 40 hours for IPs who were paid for working an average of 40 hours or less in January 2016 or for providers hired after January 31, 2016. These IPs may not work overtime hours without approval by the Department. The majority of IPs fall into this category.

A smaller population of IPs may have work week limits over 40 and up to 65 hours if the IP was paid for working an average number of weekly hours over 40 in January 2016. If an IP was paid for working an average number of weekly hours over 65, the IP will be limited to 65. For IPs who worked over 40 and up to 65 in January 2016, their work week limit was individually established based upon the number of hours paid in January and range from 40.25 to 65 hours. These IPs may not work additional overtime in a month without approval by the Department. The statute stipulates, however, that any reduction in hours cannot take place until the Department has completed a review of the client's plan of care. There is an appeal process IPs may use to appeal their assigned work week if the service hours the IP was paid for in January 2016 did not accurately represent the IP's work history in February and March 2016.

4.1 IP Overtime Hours Reported Categorized by Work Week Limits

Eighty-six percent of the overtime hours worked in this quarterly reporting period were worked by IPs who, based upon the statute, have an established work week limit above 40 hours. This is consistent with data from the last quarterly report. Overtime hours reported for these IPs include hours that are within their approved work week limit as well as hours that are above their limit.

It is expected that the number of overtime hours worked by this group of IPs will continue to be a high proportion of overall overtime hours. The total number of hours of overtime worked by this group of IPs is expected to decline as the limits described in the statute are fully implemented. It is



expected that turnover of these high-hour IPs will occur although turnover is expected to be lower than the average IP turnover rate. The 65-hour work week limit lowers to sixty hours per week as of July 1, 2017. Please see [Appendix C](#) for complete data.

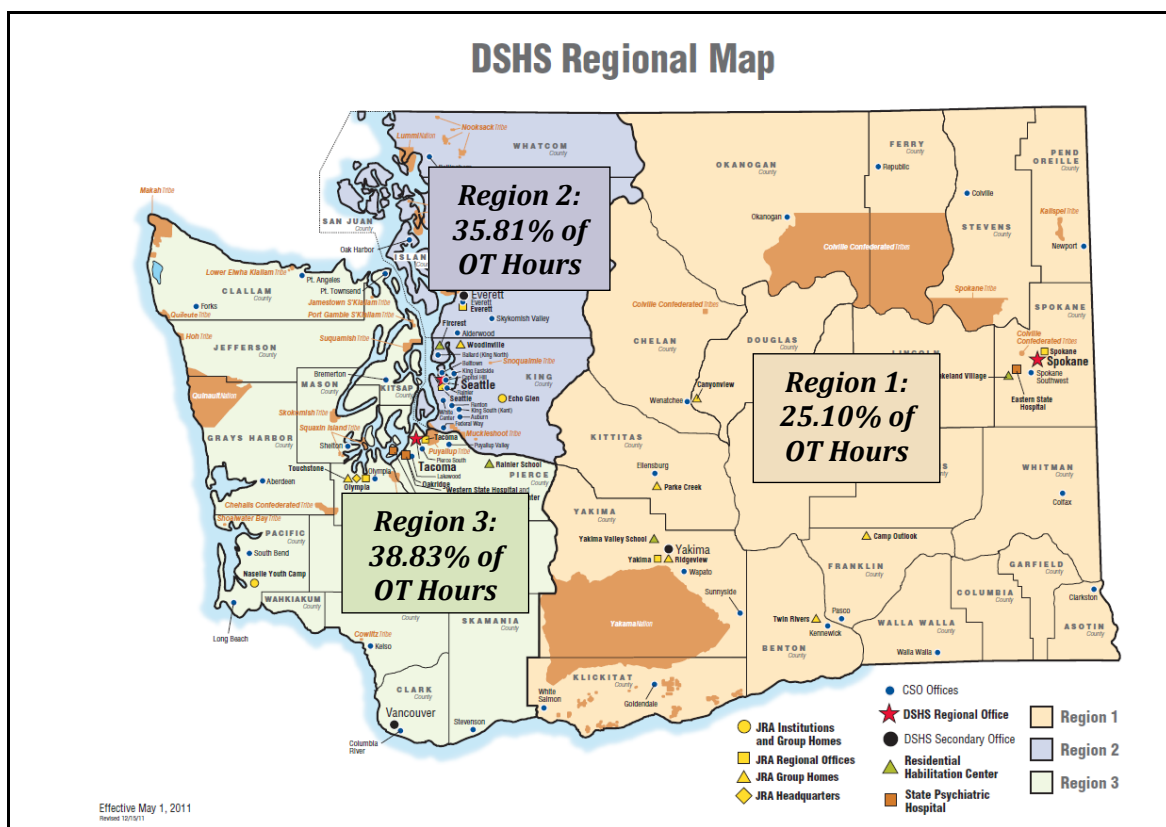
5 Regional Distribution of Overtime Hours

The map below illustrates the regional organization of DSHS and the distribution of overtime hours reported by the three DSHS Regions:

- Region 1: 25.10%
- Region 2: 35.81%
- Region 3: 38.83%

The percentage of overtime paid in each region is consistent with the percentages of authorized hours in each region. The small number of overtime hours (0.3%) paid cross-regions is almost exclusively between regions 2 and 3. The regional distribution of overtime hours for this reporting period is similar to the last reporting period.

Please see [Appendix D](#) for complete data by work week.



5.1 Percentage Overtime Paid to IPs, by County

The table below illustrates the IP overtime breakdown by the consumer’s county of residence. The data is from the week of August 21, 2016. It excludes the small number of overtime hours worked by IPs with clients in multiple counties.

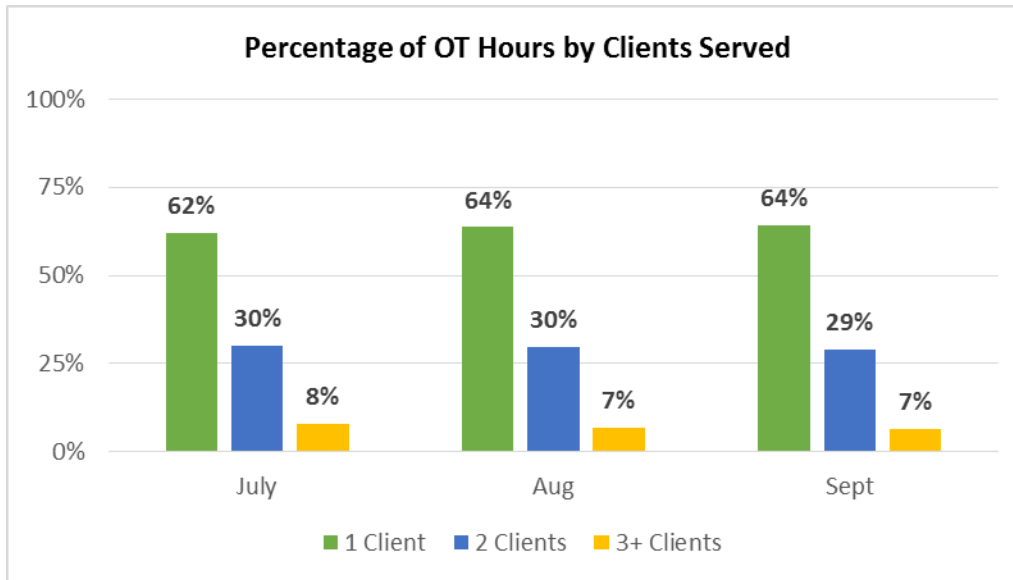
County	IP OT Hours	Percentage
Adams	200	0.35%
Asotin	284	0.50%
Benton	2000	3.49%
Chelan	382	0.67%
Clallam	585	1.02%
Clark	5548	9.69%
Columbia	56	0.10%
Cowlitz	1013	1.77%
Douglas	252	0.44%
Ferry	96	0.17%
Franklin	932	1.63%
Garfield	3	0.00%
Grant	1112	1.94%
Grays Harbor	996	1.74%
Island	614	1.07%
Jefferson	222	0.39%
King	12536	21.90%
Kitsap	2392	4.18%
Kittitas	226	0.40%
Klickitat	192	0.34%

County	IP OT Hours	Percentage
Lewis	740	1.29%
Lincoln	147	0.26%
Mason	361	0.63%
Okanogan	603	1.05%
Pacific	172	0.30%
Pend Oreille	125	0.22%
Pierce	8288	14.48%
San Juan	8	0.01%
Skagit	770	1.35%
Skamania	99	0.17%
Snohomish	4989	8.72%
Spokane	3822	6.68%
Stevens	467	0.82%
Thurston	2065	3.61%
Wahkiakum	48	0.08%
Walla Walla	325	0.57%
Whatcom	957	1.67%
Whitman	195	0.34%
Yakima	2058	3.59%

5.2 Overtime Hours by Number of Clients Associated with an IP

The data on overtime hours by the number of clients served by the IP is consistent across all months of the quarter, with the majority (62-64%) paid to IPs working with just one client. Approximately 30% of the overtime hours were paid to IPs serving two clients, and the remaining 7-8% percent claimed by IPs serving three or more clients each month.

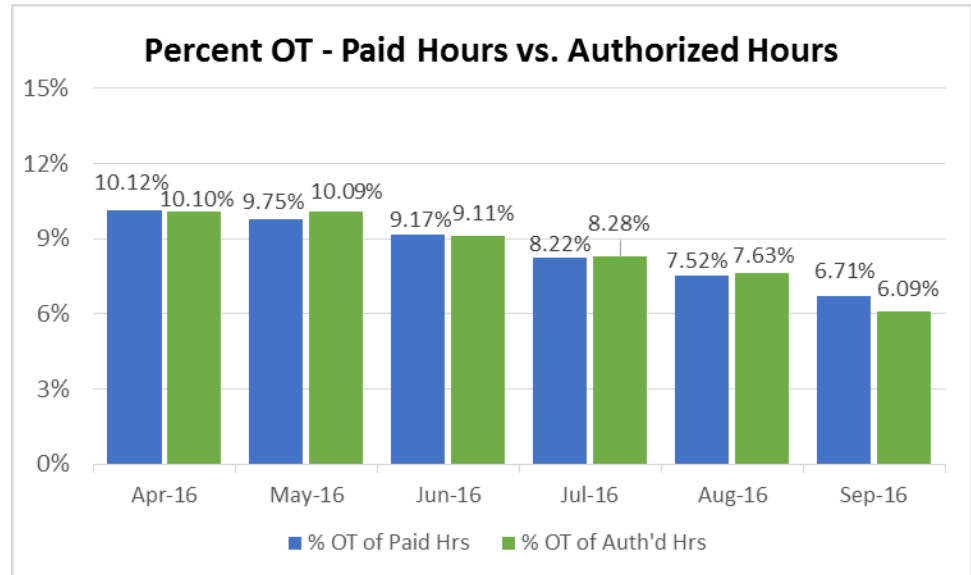
Please see [Appendix E](#) for complete data.



6 Percent of Overtime of Paid Hours vs. Authorized Hours

The overtime data presented in the first two quarterly reports is based on percentage of overtime hours paid compared to all hours paid rather than a comparison to hours authorized. Hours of payment and overtime are calculated on a work week and therefore the percentages can be easily calculated. However, hours are authorized on a monthly rather than a weekly basis. Since paid hours are calculated on a weekly basis and authorized on a monthly basis, the percentage of paid overtime hours compared to monthly authorized hours requires assumptions that do not result in an apples to apples comparison.

The Joint Legislative-Executive Overtime Oversight Task Force asked to see the two views of the data to determine if there was a significant difference to consider. The chart below shows the comparison of overtime as a percentage of all hours paid, vs. overtime hours as a percentage of all hours authorized, and illustrates minor differences. Please see [Appendix F](#) for complete data.

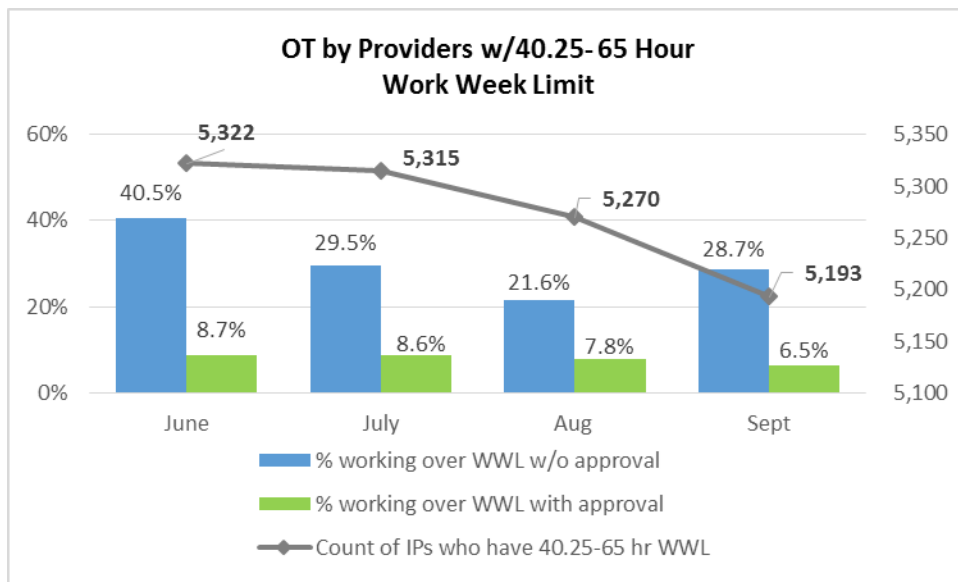


7 Approved vs. Non-Approved Excess Hours

The Department tracks overtime data of IPs who are working in excess of their identified work week limits. This includes hours that were approved by the Department and those that were not approved. The data below are averages, by work week limits, and covers overtime worked since June 2016. It is important to note that this time period represents a period of significant transition for clients and their IPs when the Department was issuing new policy to comply with the requirements of the statute. This included reviewing client care plans that involved providers who were assigned hours in excess of the new work week limits while also determining impacts related to health and safety and risk of institutionalization.

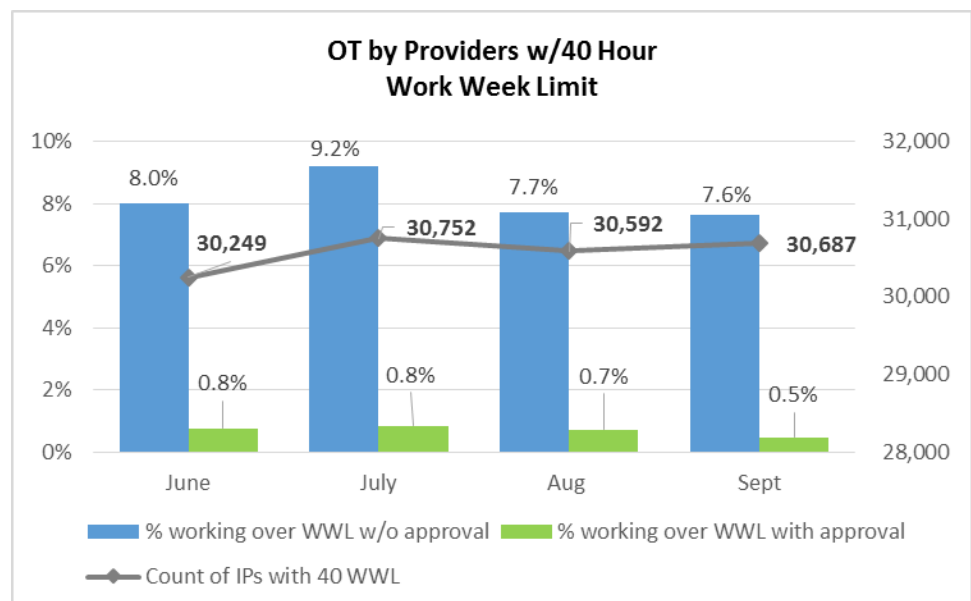
For IPs with work week limits of 40.25-65 hours:

- 30% have worked over the limit *without* approval
- 7.9% have worked over the limit *with* approval



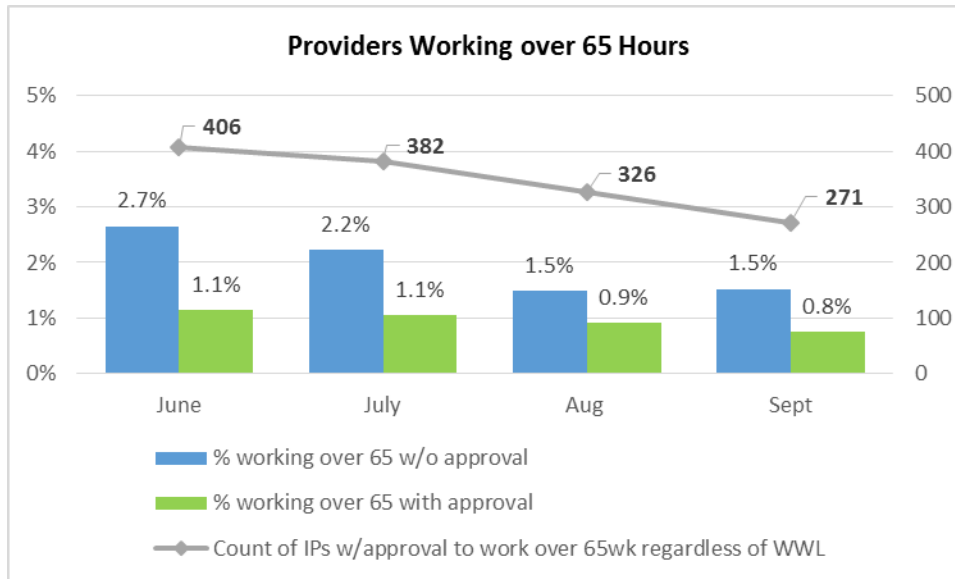
For IPs with work week limits of 40 hours:

- 8.1% have worked overtime *without* approval
- 0.7% have worked overtime *with* approval



For IPs regardless of approved work week limit:

- A small percentage (1%) of IPs have worked over 65/week *without* approval
- Two percent have worked in excess of 65hr/week *with* approval



Please see [Appendix G](#) for complete data.

8 Next Steps

The Department continues to implement its plans for ensuring expenditures are contained within the limits outlined in the annual Spending Plan. This includes reviewing exceptions to policy to determine when additional overtime hours over the IP's work week will be authorized based upon criteria in the statute related to needs of consumers. The Department is also in the process of implementing contract actions for providers working over their work week limit without a valid approval reason as defined in the statute and Washington Administrative Code (WAC). Reporting solutions have been implemented to identify IPs who have claimed hours in excess of their work week limit.

When an IP is identified in the report because they claimed more hours than were allowed and approved by the Department based on the new overtime rules, there is a three-step contract action process intended to educate the IP and their consumer about the rules and ensure compliance with the statute:

- Step One: IP and consumer are notified, in writing, that continuing violations may lead to contract termination.
- Step Two: IP and consumer are notified, in writing, that one more violation could lead to contract termination.
- Step Three: IP and consumer are notified of contract termination. Consumer is offered assistance in locating a new qualified care provider.

The first of the Step One notifications were mailed October 7, 2016. The outcome of these next steps will be seen in future quarterly expenditure reports that will be submitted by the Department.

9 Conclusion

This quarterly report shows improving data regarding the percentage of overtime worked. However, the data is not yet stable and is expected to evolve over the next reporting cycles. This is due to:

1. The controls the Department is putting in place to contain overtime expenditures, while meeting client needs, is still being implemented and outcomes are still to be seen;
2. Consumers and IPs are still adjusting to the change from no work week limits to having work week limits, and are just recently seeing notifications about potential contract actions;
3. The Department continues implementing policy, procedure, and overtime utilization monitoring tools, and is refining them to ensure costs are contained without posing risk to client health and safety.
4. Workforce availability remains an issue that is being evaluated as the Department works with clients who have a high number of hours authorized.

The next quarterly report includes months in which the implementation of overtime limits and contract actions for IPs who exceed their overtime limits will begin to show effects. The Department will have early data on the number of work week limit exceptions that have been made due to client need and the reasons for those approvals. Overtime expenditure data will also be available as it is expected that full functionality within IPOne will have been implemented.

Appendix A: IP Overtime Hours for AL TSA and DDA, Combined

Work Week	Total IP Hours	Total OT Hours	Average OT Hours
7/3/2016	955,358	86,677	9.07%
7/10/2016	929,741	77,956	8.38%
7/17/2016	908,129	72,057	7.93%
7/24/2016	850,373	60,275	7.09%
7/31/2016	935,393	74,950	8.01%
8/7/2016	943,729	77,463	8.21%
8/14/2016	895,120	63,829	7.13%
8/21/2016	860,633	57,236	6.65%
8/28/2016	829,598	50,926	6.14%
9/4/2016	923,025	75,070	8.13%
9/11/2016	880,196	62,861	7.14%
9/18/2016	834,622	61,156	7.33%
9/25/2016	685,242	28,470	4.15%*
Average:	879,320	65302	7.43%

* Please note: The data represented in the chart for September, and particularly the last two weeks of September, is not fully mature as of the date of report finalization. Actual numbers for that month may be somewhat higher than what is reflected in the chart.

Appendix B: Comparison of IP Overtime by Administration

Work Week	IP OT Hours Worked for DDA	Percentage OT hours worked by DDA IPs	IP OT Hours Worked for ALTSA	Percentage OT Hours by ALTSA IPs	IP OT Hours worked for DDA & ALTSA Clients	Percentage OT worked by DDA & ALTSA IPs	Total IP OT Hours
7/3/2016	33,732	38.9%	47,111	54.4%	5,834	6.7%	86,677
7/10/2016	30,075	38.6%	42,446	54.4%	5,435	7.0%	77,956
7/17/2016	27,359	38.0%	39,405	54.7%	5,293	7.3%	72,057
7/24/2016	22,731	37.7%	33,383	55.4%	4,161	6.9%	60,275
7/31/2016	29,444	39.3%	40,569	54.1%	4,937	6.6%	74,950
8/7/2016	30,778	39.7%	41,658	53.8%	5,027	6.5%	77,463
8/14/2016	25,638	40.2%	33,933	53.2%	4,259	6.7%	63,829
8/21/2016	23,344	40.8%	29,994	52.4%	3,898	6.8%	57,236
8/28/2016	20,383	40.0%	27,141	53.3%	3,401	6.7%	50,926
9/4/2016	29,928	39.9%	40,421	53.8%	4,721	6.3%	75,070
9/11/2016	24,810	39.5%	34,010	54.1%	4,042	6.4%	62,861
9/18/2016	24,379	39.9%	32,836	53.7%	3,941	6.4%	61,156
9/25/2016	11,424	40.1%	15,215	53.4%	1,831	6.4%	28,470*
Average:	25,694	39%	35,240	54%	4,368	7%	65,302

* Please note: The data represented in the chart for September, and particularly the last two weeks of September, is not fully mature as of the date of report finalization. Actual numbers for that month may be somewhat higher than what is reflected in the chart.

Appendix C: IP Overtime Hours Reported by Work Week Limits

Work Week	OT Hours for IPs with 40 hour limit	Percentage of OT Hours for IPs with 40 hour limit	OT Hours for IPs with 40.25 to 65 hour limit	Percentage of OT Hours for IPs with 40.25 to 65 hour limit	Total OT Hours all IPs
7/3/2016	16,096	13.5%	70,581	9.7%	86,677
7/10/2016	11,826	9.9%	66,130	9.1%	77,956
7/17/2016	11,065	9.3%	60,991	8.4%	72,057
7/24/2016	7,837	6.6%	52,438	7.2%	60,275
7/31/2016	12,803	10.7%	62,146	8.5%	74,950
8/7/2016	12,236	10.2%	65,227	8.9%	77,463
8/14/2016	8,277	6.9%	55,553	7.6%	63,829
8/21/2016	6,139	5.1%	51,097	7.0%	57,236
8/28/2016	5,451	4.6%	45,474	6.2%	50,926
9/4/2016	11,826	9.9%	63,244	8.7%	75,070
9/11/2016	7,100	5.9%	55,761	7.6%	62,861
9/18/2016	6,505	5.4%	54,651	7.5%	61,156
9/25/2016	2,395	2.0%	26,075	3.6%	28,470*
Average:	9,197	8%	56,105	8%	65,302

* Please note: The data represented in the chart for September, and particularly the last two weeks of September, is not fully mature as of the date of report finalization. Actual numbers for that month may be somewhat higher than what is reflected in the chart.

Appendix D: IP Overtime Hours by DSHS Region

(Excludes small number of hours reported by providers who work with clients in multiple regions)

Work Week	Region 1 Hours	Percentage Region 1	Region 2 Hours	Percentage Region 2	Region 3 Hours	Percentage Region 3
7/3/2016	21,629	25%	31,377	36%	33,417	39%
7/10/2016	19,383	25%	27,795	36%	30,516	39%
7/17/2016	18,265	25%	25,540	36%	27,951	39%
7/24/2016	15,133	25%	20,890	35%	24,059	40%
7/31/2016	18,663	25%	27,092	36%	29,013	39%
8/7/2016	18,879	24%	27,870	36%	30,495	39%
8/14/2016	15,808	25%	22,900	36%	24,948	39%
8/21/2016	13,878	24%	20,306	36%	22,882	40%
8/28/2016	12,689	25%	18,098	36%	19,976	39%
9/4/2016	19,219	26%	27,959	37%	27,657	37%
9/11/2016	16,160	26%	22,580	36%	23,957	38%
9/18/2016	15,901	26%	21,833	36%	23,251	38%
9/25/2016	7,383	26%	9,643	34%	11,413	40%*
Average:	16,384	25%	23,376	36%	25,349	39%

* Please note: The data represented in the chart for September, and particularly the last two weeks of September, is not fully mature as of the date of report finalization. Actual numbers for that month may be somewhat higher than what is reflected in the chart.

Appendix E: Overtime Hours by Number of Clients Associated with an IP

Work Week	OT Hours IPs Serving 1 Client	OT Hours IPs Serving 2 Clients	OT Hours IPs Serving 3+ Clients
7/3/2016	54,695	25,387	6,595
7/10/2016	48,338	23,392	6,226
7/17/2016	43,925	22,055	6,076
7/24/2016	37,046	18,193	5,037
7/31/2016	47,158	22,445	5,348
8/7/2016	49,242	23,280	4,940
8/14/2016	40,610	18,731	4,489
8/21/2016	36,582	16,745	3,909
8/28/2016	32,353	15,153	3,420
9/4/2016	48,713	21,556	4,801
9/11/2016	40,318	18,368	4,176
9/18/2016	39,120	17,895	4,142
9/25/2016	18,288	8,349	1,834*
Grand Total	536,384	251,548	60,991

* Please note: The data represented in the chart for September, and particularly the last two weeks of September, is not fully mature as of the date of report finalization. Actual numbers for that month may be somewhat higher than what is reflected in the chart.

Appendix F: Percent of Overtime of Paid Hours vs. Authorized Hours

Week Start Date	Week End Date	Weekly Hours	Weekly OT	Auth Hours	% OT vs Paid	% OT vs authorized
4/3/2016	4/9/2016	959,794	104,429	923,949	10.88%	11.30%
4/10/2016	4/16/2016	932,388	93,764	923,949	10.06%	10.15%
4/17/2016	4/23/2016	929,395	93,823	923,949	10.10%	10.15%
4/24/2016	4/30/2016	867,662	81,225	923,949	9.36%	8.79%
Monthly total:		3,689,239	3,689,239	373,241	3,695,795	10.10%
5/1/2016	5/7/2016	981,277	108,140	896,132	11.02%	12.07%
5/8/2016	5/14/2016	954,044	98,776	896,132	10.35%	11.02%
5/15/2016	5/21/2016	909,417	82,601	896,132	9.08%	9.22%
5/22/2016	5/28/2016	865,424	72,291	896,132	8.35%	8.07%
Monthly total:		3,710,161	361,808	3,584,527	9.75%	10.09%
5/29/2016	6/4/2016	870,016	71,509	915,004	8.22%	7.82%
6/5/2016	6/11/2016	957,010	94,280	929,159	9.85%	10.15%
6/12/2016	6/18/2016	932,197	86,627	929,159	9.29%	9.32%
6/19/2016	6/25/2016	917,918	84,840	929,159	9.24%	9.13%
Monthly total:		3,677,141	337,256	3,702,481	9.75%	9.11%
6/26/2016	7/2/2016	889,626	75,451	919,422	8.48%	8.21%
7/3/2016	7/9/2016	955,358	86,677	895,079	9.07%	9.68%
7/10/2016	7/16/2016	929,741	77,956	895,079	8.38%	8.71%
7/17/2016	7/23/2016	908,129	72,057	895,079	7.93%	8.05%
7/24/2016	7/30/2016	850,373	60,275	895,079	7.09%	6.73%
Monthly total:		4,533,225	372,414	4,499,738	8.22%	8.28%
7/31/2016	8/6/2016	935,393	74,950	895,584	8.01%	8.37%
8/7/2016	8/13/2016	943,729	77,463	895,669	8.21%	8.65%
8/14/2016	8/20/2016	895,120	63,829	895,669	7.13%	7.13%
8/21/2016	8/27/2016	860,633	57,236	895,669	6.65%	6.39%
Monthly total:		3,634,874	273,477	3,582,590	7.52%	7.63%
8/28/2016	9/3/2016	829,598	50,926	905,481	6.14%	5.62%
9/4/2016	9/10/2016	923,025	75,070	918,564	8.13%	8.17%
9/11/2016	9/17/2016	880,196	62,861	918,564	7.14%	6.84%
9/18/2016	9/24/2016	834,622	61,156	918,564	7.33%	6.66%
9/25/2016	10/1/2016	685,242	28,470	912,645	4.15%	3.12%
Monthly total:		4,152,681	278,483	4,573,818	6.71%	6.09%

* Please note: The data represented in the chart for September, and particularly the last two weeks of September, is not fully mature as of the date of report finalization. Actual numbers for that month may be somewhat higher than what is reflected in the chart.

Appendix G: Approved vs. Non-Approved Excess Hours

	June	July	Aug	Sept	Average
Any WWL Working Over 65					
Count of IPs w/approval to work over 65wk regardless of WWL	406	382	326	271	
Count of IPs who worked over 65 w/o approval	943	803	534	546	
% working over 65 w/o approval	2.7%	2.2%	1.5%	1.5%	2.0%
% working over 65 with approval	1.1%	1.1%	0.9%	0.8%	1.0%
WWL of 40.25-65					
Count of IPs who have 40.25-65 hr WWL	5,322	5,315	5,270	5,193	
Count of IPs with 40.25-65 WWL who have approval to work over 65/wk	465	458	413	336	
Count of IPs who worked over their 40.25-65 WWL w/o approval	2,154	1,570	1,139	1,491	
% working over WWL w/o approval	40.5%	29.5%	21.6%	28.7%	30.1%
% working over WWL with approval	8.7%	8.6%	7.8%	6.5%	7.9%
WWL of 40					
Count of IPs with 40 WWL	30,249	30,752	30,592	30,687	
Count IPs with approval to work over 40wk	228	260	218	145	
Count of IPs who worked over 40 w/o approval	2,416	2,835	2,356	2,347	
% working over WWL w/o approval	8.0%	9.2%	7.7%	7.6%	8.1%
% working over WWL with approval	0.8%	0.8%	0.7%	0.5%	0.7%

*WWL = work week limit