



DEPARTMENT OF THE ARMY  
UNITED STATES ARMY GARRISON ITALY  
UNIT 31401, BOX 42  
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IMIT-ZB

MEMORANDUM FOR RECORD

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

1. REFERENCES:

- a. USAG ITALY Time & Attendance Business Rules for Department of the Army Civilians (DAC), 24 April 2018
- b. Conditions of Employment (COE) for Local National Employees of U.S. Armed Forces in Italy, 1 November 2018
- c. Audit Readiness Support Handbook (General/Civilian Payroll, February 2016) published by the Office of the Assistant Secretary of the Army (Financial Management & Comptroller) (OASA(FM&C)) Army Accountability & Audit Readiness Directorate.

2. PURPOSE: This document establishes policy and internal controls over T&A reporting for LN Employees of USAG Italy.

3. APPLICABILITY: This SOP applies to LN employees of USAG Italy. T&A policy for USAG Italy DACs is covered by a separate SOP. This SOP is intended to supplement and not supplant higher-level policy.

4. Roles and Responsibilities:

- a. The Director of the Italy Finance Office (IFO) is responsible for LN T&A reporting. The IFO LN Pay section will provide Customer Service Representative (CSR) services and be the primary POC for LN T&A policy, scheduling, and policy.
- b. The CSRs will serve as the primary SCUDONLINE (the LN Time and Attendance Production System) POCs for LN T&A reporting. The IFO IMO will act as the primary POC for all access requests and issues. The IFO CSR and IMO will act in concert to manage the following:

- (1) Manage and monitor Timekeeper and Certifier appointments, appointment terminations and SCUDONLINE system access via DD form 2875. Restrict

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

Timekeepers and Certifiers from performing their functions unless the required appointments are in place via DD Form 577. Process appointment terminations and revoke system access as needed.

- (2) Manage employee profiles in SCUDONLINE. Initiate and update each assigned employee's tour of duty (work schedule) in SCUDONLINE. Close employee's records as needed.
- (3) Conduct annual system access reviews. This control ensures that a review is performed for all users with access to SCUDONLINE to verify that each user's access and level of access is appropriate and still needed.
- (4) Organize periodic SCUDONLINE training for new users or current users that need a refresher.
- (5) Retain Certifying Officer's appointment forms and required training certificates

c. USAG Italy Directors/Chiefs will:

- (1) Have the overall responsibility to ensure completeness, accuracy and timeliness of LN T&A in accordance with this SOP.
- (2) Appoint Timekeepers and Certifiers using the DD Form 577 and request SCUDONLINE access via DD form 2875.
- (3) Ensure that appointed Timekeepers and Certifiers maintain system access and conduct T&A procedures in accordance with this SOP. Reappoint Timekeepers and Certifiers as soon as practical upon impending loss or reassignment.
- (4) Devise plans for back-up support in cases of Timekeeper and/or Certifier absence from work.

d. Timekeepers will:

- (1) Collect and review completed manual T&A forms at the end of every month. Ensure that all completed T&A forms include employee and supervisor signatures and that all T&A annotations are valid and supported by approved leave/premium pay requests and/or appropriate documentation. See Appendix 5 for USAG-IT FORM 37-1A - Time and Attendance Report Non-US Personnel, Appendix 6 for Time and Attendance Report Non-US Personnel – Fire Department and Appendix 7 for Time and Attendance Report Non-US Personnel – Interpreters.
- (2) Input monthly T&A in SCUDONLINE for each employee.

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

- (3) Monitor that T&A is certified in SCUDONLINE according to pay period cutoff schedules (see Appendix 4 - Calendar Year 2020 Pay Schedule). Assist CSRs, Certifiers, and employees with LN T&A concerns and discrepancy resolution.
  - (4) Distribute relevant notifications throughout their sections (i.e. payroll processing schedules, procedural/guidance changes, etc.). Inform Certifiers of updates regarding Leave Availability Reports.
  - (5) Coordinate with employee and Certifier to revise any unsupported or incorrect T&A annotations.
  - (6) Retain required documentation (see paragraph 13).
  - (7) Inform CSR 30 days prior to relinquishing duties.
  - (8) If and when possible, assist with seamless transition of timekeeping duties to temporary or permanent Timekeeper replacement.
- e. Certifiers are generally the employee's supervisor. The terms "Certifier" and "Supervisor" are used interchangeably throughout this SOP. Certifiers/Supervisors will:
- (1) Take the Certifying Officer Legislation (COL) Foundations training annually. See par 6. (3) for details.
  - (2) Review and sign subordinate manual T&A forms. Ensure all T&A annotations are valid and supported by approved leave/premium pay requests and/or other appropriate documentation.
  - (3) Review and approve/disapprove leave (OPM Form 71 Rev. September 2009) and premium pay (IMCOM FORM 1-H, MAR 2014) requests.
  - (4) Certify subordinate T&A in SCUDONLINE. T&A certification constitutes authorization for the expenditure of government funds.
- f. Employees will:
- (1) Submit a Change of Work Schedule request to their Supervisor when a Change of Work Schedule is desired and allowed in his/her Directorate/Support Office/Staff Section. If approved, provide a copy of the approved Change of Work Schedule request to the Timekeeper and CPAC.

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

- (2) Initiate all leave (OPM Form 71 Rev. September 2009) and premium pay (IMCOM FORM 1-H, MAR 2014) requests and submit to Supervisor.
  - (3) Submit a completed manual T&A form (for the list of available codes see Appendix 2) and supporting documents (e.g. approved leave/premium pay requests) to their Supervisor for approval in accordance with established pay period schedule. Form to be used is USAG-IT FORM 37-1A - Time and Attendance Report Non-US Personnel. See Appendix 5 for a sample. Fire Department Personnel will use the Time and Attendance Report Non-US Personnel – Fire Department on Appendix 6 and Interpreters will use the Time and Attendance Report Non-US Personnel – Interpreters on Appendix 7.
  - (4) Review their Leave and Earnings Statements (LES/"Foglio Paga") and report T&A discrepancies and concerns to their Certifier and/or Timekeeper.
5. T&A Appointments for Timekeepers and Certifiers:
- a. In accordance with this SOP, Certifiers will be appointed as "Certifying Officers". Certifying officers are pecuniary liable for payments resulting from improper certifications. LN Certifiers are not liable per COE.
  - b. Appointments must be made with DD Form 577 (Appointment/Termination Record). Appointment authority is delegated to Directors/Chiefs. Appointees must digitally and manually sign the DD Form 577 after the appointing authority has signed.
  - c. Appointments remain in force until terminated. DD Form 577s cannot be amended. Any change requires termination of the existing DD Form 577 and submission of a new DD Form 577. Appointments must be terminated by an appropriate appointment authority (Director/Chief and above).
  - d. CSRs are responsible for tracking T&A appointments and terminations. They must retain the DD Form 577.
6. Training:
- a. The following LN T&A training and reference material is available:
    - (1) A SCUDONLINE Timekeeper guide is available from the SCUDONLINE website upon operator system access (see also Appendix 1).
    - (2) Periodical IFO scheduled SCUDONLINE training for Timekeeper/Certifiers.

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

- (3) Certifying Officer Legislation (COL) Foundations (or equivalent):  
<https://dfas4dod.dfas.mil/training/Courses/coltraining.htm> (select e-mail certificate).  
This training is mandatory for Certifiers, not for Timekeepers and Employees.

- b. The CSR will manage training compliance for Certifiers to include retaining training documentation and notifying personnel of training opportunities and suspenses.

7. SCUDONLINE System Access:

- a. The CSR will manage system access for both Timekeepers and Certifiers. Personnel requiring system access will submit an email to the IFO IMO and CSRs with required documentation attached.
- b. The following documentation is required to obtain system access:
  - (1) DD Form 2875, System Authorization Access Request.
  - (2) DD Form 577, Appointment/Termination Record.
  - (3) System Access Review: The IFO IMO and Internal Controls section will conduct an annual/periodic review of user accounts. This process is an Audit Readiness control (Statement of Budgetary Resources - SBR 11.04). The CSR will retain documentation of this control (see Paragraph 19).

8. Tour of Duty:

The Tour of Duty for a LN Employee is established upon hire of the employee through Job Offer at CPAC (Full Time or Part Time).

- a. Full time tour of duty consists of 40 hours per week normally scheduled on five 8-hour workdays, Monday through Friday from 0800 to 1700 with an hour break. However, different arrangements may be necessary to meet the operational needs of the employer (See COE Art 18 Par 1).
- b. Part time employment is defined as employment, either temporary or indefinite, with a regularly scheduled tour of duty of less than the normal full time work schedule as defined in COE Art 18 (See COE Art 11 Par 3)

9. Change of Work Schedule:

A variation from the common standard schedule of 0800-1700 with an hour break may offer management advantages such as improved customer service, increased productivity and efficiency and higher employee morale. Employee requests Director/Supervisor approval with a

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

memorandum in Italian with translation in English. The Italian version of the memorandum is signed by both the Employee and Director/Supervisor. If approved employee will send the signed memorandum to CPAC which will keep it in the Official Personnel Folder and to timekeeper, who will in turn notify CSRs.

#### 10. Premium Pay (Overtime and Compensatory Time for Travel)

- a. Overtime and Compensatory Time for Travel are collectively known as “Premium Pay” and are administered in accordance with COE (Art 42 and Art 17 respectively).
- b. Overtime is time worked in excess of 40 hours per week, provided the employee is in a pay status (to include paid leave and absences) throughout the scheduled weekly hours (See COE Art 42 Par 3).
- c. Part-time employees may be requested to perform supplementary and overtime work. Supplemental work consists of work performed beyond the hours specified in the individual’s contract and within the normal weekly work schedule of 40 hours. Hours performed in excess of 40 hours per week are considered overtime work (See COE Art 11 Par 3b).
- d. Approval authorities for all LN employee premium pay requests are usually the directors and must be appointed through a DD Form 577.
- e. Approval to earn premium pay must be granted in writing in advance of the work being performed, or if not feasible, as soon as possible after work has been performed. A single premium pay request shall not cover more than a single pay period. Each request shall:
  - (1) Describe the work to be performed.
  - (2) Explain why such work could not be performed during regular working hours.
  - (3) Include the dates and hours which the work is to be performed.
- f. Overtime is used to meet critical mission requirements and is limited to cases of real necessity where risk to life, health, safety and mission critical operations can be demonstrated. With the exception of special cases, such as emergency response personnel, overtime is not intended for routine work. There are limitations to the amount of overtime that can be earned per pay period (See COE Art 42).
- g. Compensatory Time for Travel:

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

- (1) Employees required to travel for official duty on non-duty hours are entitled to compensatory time off for each hour of such travel. Compensatory time off will be scheduled in conjunction with the supervisor and will be used within 21 calendar days following completion of TDY if consistent with operational requirements as determined by management. Delays in granting compensatory time off for operational requirements must be documented by the supervisor or manager and will not exceed a total of 42 calendar days from the day of the return from TDY. Employees who drive vehicles for official purposes in conjunction with the performance of official duties will be paid overtime in lieu of compensatory time-off. (COE Art 17 Par 3)
- (2) Certifiers should monitor aging travel compensatory time on the leave availability reports and schedule with employees the use of such.

#### 11. Use of Leave

- a. Leave requests (annual leave, permessi) must be signed in advance or, if not feasible (i.e. unforeseen event), as soon as possible after the employee returns to duty. Employees will submit leave requests using the OPM Form 71. Employees will request leave as far in advance as possible. In case of unscheduled leave employees will notify the supervisor, or the delegated management representative within 2 hours of the first day of absence and every time the absence is further extended unless prevented by justifiable reasons (See COE Art 23 par 6b). OPM Form 71 is needed also for sick leave, but in this case supervisor's approval is not required. Travel compensatory time is required to be scheduled in conjunction with the supervisor and must be used within 21 calendar days following completion of TDY if consistent with operational requirements as determined by management. Delays in granting compensatory time off for operational requirements must be documented by the supervisor or manager and will not exceed a total of 42 calendar days from the day of return from TDY (See COE Art 17 par 3). Employees will use the Non-US Personnel Travel OT\_CT Worksheet on Appendix 8 to calculate the Travel Compensatory time (or Overtime for the hours driven), which must be signed by both the Employee and the Supervisor.
- b. Supervisors are the approval authorities for leave. Requests for leave will be granted if the request is submitted in advance and the absence will not hinder mission accomplishment.
- c. Variances between the approved absence and actual absence (i.e. leave extended, dates changed, leave type changed, etc.) must be resolved with an accurate and reapproved leave request.

#### 12. Types of Leave:

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

- a. Annual leave is an approved leave of absence from duty with pay for personal, emergency or other reasons. Annual leave is an entitlement the employee may not renounce; however, the scheduling of it is subject to approval by the employee's supervisor. (COE Art 21)
- b. *Permessi*: based on results of the annual wage survey the annual work hours may be reduced. Reductions are granted as rest days, *permessi* or pay, as agreed upon between the Joint Civilian Personnel Committee and the national union structures. *Permessi* hours will not exceed 47 hours maximum. They are requested by the employee and approved by the supervisor under the same procedures as approval procedures for annual leave. When an employee requests an absence of less than one day, this absence will be *permessi* until all *permessi* hours are exhausted, unless carry over annual leave is available (in this case old leave must be used first). *Permessi* will be charged in increments of no less than 1 hour. As of 1 October each year, supervisors will be given an accounting of all unused *permessi* for their employees. Employees will be required to schedule the use of remaining *permessi* prior to 31 December. *Permessi* which remain unused by 31 December will be compensated at the overtime rate of pay.
- c. Sick Leave is authorized for personal medical needs. For sick leave absences in excess of two days a medical certificate is required (COE Art 23). Sick leave must be notified to the supervisor within 2 hours of the first day of absence and every time the absence is further extended. If a medical certificate is produced, employee must communicate the protocol# to the supervisor and the period covered by the certificate.
- d. Advanced Leave (up to 40 hours) can only be requested after 1 October of calendar year in the case incumbent has exhausted all annual leave and *permessi* (See COE Art 21 par 8).
- e. Leave Without Pay (LWOP): LWOP is a temporary non-pay status, thereof, is at the supervisor's discretion and should be authorized/approved only when the interests of the government are best served; thereby based on mission requirements and workload. An employee must exhaust annual leave and *permessi* before requesting LWOP (See COE Art 22).
- f. Administrative Leave is an administratively authorized absence that does not result in the loss of pay or a charge to leave of any kind. The following are examples of instances where administrative leave may be appropriate:
  - (1) In case of death or documented grave illness of a close relative (spouse, civil partner, children, parents, grandparents, brothers, sisters, parents of spouse) (See COE Art. 22 par 3)

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

- (2) Closure of the installation by administrative order of the employer because of events beyond the control of employer or employees such as extreme weather conditions, serious interruptions to public transportation and disaster (See COE Art. 22 par 7)
- (3) To participate in a one-time, command-sponsored fitness program. Excused time of up to 3 hours per week for up to 6 months is permitted. This program must be approved by the Garrison Commander or Deputy to the Garrison Commander.

g. Other types of leave

- (1) blood donations: employees are entitled to a period of rest of 24 hours following the time of departure for blood donation, without charge to leave or loss in pay, provided donation is to a bank accredited by the Ministry of Health and a certificate is produced. (See COE Art. 22 # 6)
- (2) Student leave: Employees who attend regular courses of study in accredited primary or secondary schools, universities, and post-degree specialization courses are eligible for paid leave on workdays when examinations are taken. These employees are also eligible for two (2) hours paid leave a day for a maximum period of eight (8) work days prior to an examination. Leave can also be granted to attend designed courses leading to improve job-related skills (Up to 150 hours in any three year period) (See COE Art.22 #12 and #13).
- (3) Marriage Leave: In conjunction with the marriage, or civil union of an employee after completion of the trial period, a marriage leave of fifteen consecutive calendar days with pay is granted; such marriage leave must be started within 90 calendar days from the date of the event (See COE Art. 22 #2).
- (4) Special Leave for family grave illness (law 104/92). Employees who continuously and exclusively assist a gravely handicapped family member up to a third degree relationship as certified by the Italian Health Authority, are entitled to 3 days per month paid absence. The entitlement ceases when the gravely handicapped close relative is hospitalized or lodged in a specialized facility. In all cases appropriate authorization from INPS or other Italian medical authority must be submitted to the civilian personnel office in order to make use of this leave. Furthermore, each month employees will communicate in writing to their supervisors on what days they need to be off for assistance of the gravely handicapped close relative. Supervisors will acknowledge receipt of this information (See COE Art. 22 #14).
- (5) Employees appointed to perform official electoral duties, including “list representatives” and referendum promoting committee representatives in all elections and referendums, are granted voting leave with pay for holidays or other type of non-workdays for the time necessary for the accomplishment of the electoral services subject to submission of appropriate certification (See COE Art. 22 #5).

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

- (6) Unless placed on LWOP at their request, employees elected to city or provincial councils are entitled to remain absent from work for the entire day in which the respective council is summoned. Further, to participate in meetings of executive bodies, council Alderman are entitled to additional leave of absence up to a maximum aggregate of 24 hours per month, raised to 48 for mayors and presidents of provincial administration. Finally, if necessary for carrying out their mandate, all of the above employees are entitled to unpaid leave up to a maximum of 24 work hours per month (See COE Art. 22# 11).

13. Document Retention:

- a. Documentation will be retained in accordance with AR 25-400-2, The Army Records Information Management Systems (ARIMS). T&A documentation will be retained for a minimum of 6 years and three months.
- b. The CSR will maintain a system of networked electronic files in which the documents listed below will be retained. The networked files will facilitate compliance monitoring, reduce risk of data loss (i.e. during employee turn-over) and improve overall auditability of civilian pay. All Personally Identifiable Information (PII) must be properly secured and handled in accordance with applicable guidance. The CSR is responsible for retaining:
  - (1) Timekeeper and Certifier duty appointments (i.e. DD Form 577s).
  - (2) System access documentation (i.e. DD Form 2875) (see Paragraph 7).
  - (3) System access review documentation (See Paragraph 7.c).
- c. Timekeepers are responsible for retaining:
  - (1) Copies of approved tour of duty changes.
  - (2) T&A time sheets and supporting documentation such as leave requests and overtime requests. Medical certificates are no longer issued by doctors as they are electronically submitted to the employer.

14. SOP Review: USAG Italy will review and update the SOP in compliance with applicable policy updates. This process is an Audit Readiness control (SBR 11.08). It is evidenced by the effective date of the signed SOP.

15. Appendix 1 – SCUDONLINE timekeeper guide.

IMIT-ZB

SUBJECT: Time & Attendance (T&A) SOP for USAG Italy Local National (LN) Employees

16. Appendix 2 – LN Payroll code list.
17. Appendix 3 – Guidance on Holiday codes.
18. Appendix 4 – Calendar Year 2020 Pay Schedule.
19. Appendix 5 – USAG-IT FORM 37-1A, June 19 - Time and Attendance Report Non-US Personnel.
20. Appendix 6 – Time and Attendance Report Non-US Personnel – Fire Department.
21. Appendix 7 – Time and Attendance Report Non-US Personnel – Interpreters.
22. Appendix 8 – Non-US Personnel Travel OT\_CT Worksheet
23. Point of contact for this SOP is USAG Italy Resource Management Office.

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