OFFICE OF THE INSPECTOR GENERAL

CITY OF BALTIMORE

Isabel Mercedes Cumming Inspector General

Investigative Report Synopsis

OIG Case # 24-0035-I

Issued: December 10, 2025

OFFICE OF THE INSPECTOR GENERAL
Isabel Mercedes Cumming, Inspector General
City Hall, Suite 635
100 N. Holliday Street
Baltimore, MD 21202

December 10, 2025

Dear Citizens of Baltimore City,

The mission of the Office of the Inspector General (OIG) is to promote accountability, efficiency, and integrity in City government, as well as to investigate complaints of fraud, financial waste, and abuse. The following synopsis is a condensed version of the full report provided to City management officials and does not contain all investigative information.

The Office of the Inspector General (OIG) received a complaint regarding excessive overtime hours for the Mayor's Office of Homeless Services (MOHS) staffing service vendor (Vendor). Specifically, the complaint alleged two former Vendor employees (VE 1 and VE 2) received compensation for an excessive number of overtime hours that were not worked. The investigation was limited due to inconsistent documentation and the absence of a formal time verification system. The OIG found that controls for verifying Vendor employees' reported work times, especially overtime, were lacking.

Background

The Vendor provided MOHS with staffing services for various City of Baltimore (City) shelter sites. MOHS entered into a contractual agreement with the Vendor in 2020 to provide additional support during the Winter Shelter period. However, with the onset of the COVID-19 pandemic, Vendor staff subsequently provided year-round support for two years. After the pandemic, Vendor employees resumed work solely during the Winter Shelter period. The Vendor supplied staff for the Winter Shelter program and the COVID shelter program operated by MOHS, which included multiple shelter sites across Baltimore City and Baltimore County.

The investigation reviewed fiscal years 2022 through 2025, including both Winter Shelter and emergency COVID-19 shelter operations.

Vendor Employees and Overtime

During an interview with the OIG, VE 1 stated that it was not unusual for employees to work shifts lasting 12 to 16 hours for five consecutive days, attributed to shortages and urgent needs. According to VE 1, they were willing to work whenever necessary and would step in if no one else was available to cover extra shifts or respond to callouts. They added that they regularly stayed overnight and took on additional responsibilities, such as custodial and monitoring tasks, which they felt justified the overtime hours. The OIG was unable to establish contact with VE 2, despite multiple attempts to reach them.

Tables 1 and 2 below illustrate a sample of the reported hours for Employee 1 and Employee 2.

Table 1: Sample of VE 1 Invoice Data

Invoice Date:	Regular Hours Worked:	Overtime Hours Worked:	Total Hours Worked:	Total Amount Paid:
11/27/2022 – 1/1/2023	200	257.75	457.75	$25,518.19
1/2/2023 – 1/29/2023	160	144.42	304.42	$16,383.41
1/30/2023 – 2/26/2023	160	110.92	270.92	$14,197.53

Table 2: Sample of VE 2 Invoice Data

Invoice Date:	Regular Hours Worked:	Overtime Hours Worked:	Total Hours Worked:	Total Amount Paid:
11/27/2022 – 1/1/2023	200	78.5	278.5	$16,125.8
1/2/2023 – 1/29/2023	136	43.5	179.5	$10,213.44
1/30/2023 – 2/26/2023	160	44.5	204.5	$11,507.56

A former MOHS supervisor (Former Supervisor) stated these hours were legitimate and attributed the high numbers to multiple site assignments, 24-hour operations, staffing shortages, and seasonal demands. Furthermore, the Former Supervisor said that VE 1 and VE 2 were among a few workers who were often more available than the other staff members. According to the Former Supervisor, candidates frequently asserted they possessed open availability during job interviews but would later be unwilling to work evenings or weekends. The Former Supervisor opined that hiring seasonal staff would diminish the number of overtime hours that Vendor workers incurred.

The OIG reviewed the total overtime of Vendor employees between fiscal years 2022 and 2025, based on Workday invoice documentation.[1] The table below summarizes the total overtime hours worked and payments made by each fiscal year (Table 3).

Table 3: Vendor Employee Overtime Trends

Fiscal Year	Overtime Hours	Overtime Payments
2023	5,188.23	$318,642.26[2]
2024	5,674.07	$307,883.92
2025	2,442.01	$118,033.38
Total	**13,304.31**	**$744,559.56**

Timekeeping Process

City employees document their work hours through Workday, while Vendor employees log their regular and overtime hours in Paycom. Paycom is a third-party electronic timekeeping system that enables users to log hours from any location using any device with internet access, without requiring the employee to be physically present on site to clock in or out. MOHS supervisory staff reviewed and approved these entries before submitting them to the Vendor for review. Once approved, the time was recorded in the Vendor system and included in the monthly invoice. The invoices and timesheets were then submitted to the City through Workday, establishing a record of the services rendered.

[1] City fiscal years begin on July 1 and end on June 30 of the following year.
[2] An invoice from July 2022 that appears related to the Shelters did not include a detailed billing report so there may be additional overtime hours not included in this amount.

The Former MOHS Supervisor explained that billing for the COVID-19 shelter and winter shelter initiative involved merging all shelter locations into a single account, requiring employees to report their total hours across all shelter sites to Paycom. A Vendor representative stated that the Vendor lacked the authority to approve employee timesheets and that verifying hours worked was the responsibility of MOHS supervisors, who oversee the daily activities of Vendor personnel.

MOHS Storage Unit

The OIG found that MOHS did not have a clock-in or clock-out system at all shelter sites to verify the exact number of hours worked by Vendor staff.[3] Vendor shelter staff recorded their start times, shift activities, and end times in on-site notebooks. MOHS supervisors then compared these entries with the hours that Vendor employees entered into Paycom for time approval and attendance confirmation. The completed notebooks were subsequently stored within the MOHS storage facility.

The investigation revealed that physical documentation, such as notebooks with sign-in sheets and seasonal records, are moved to a MOHS storage unit. However, a MOHS supervisor indicated that retrieving documents is problematic, as records from the same season are bundled together without adequate labeling. The OIG visited MOHS's storage facility to recover sign-in and sign-out notebooks for Vendor employees. The storage unit contained unlabeled records, requiring OIG staff to perform a manual search to locate the records. Photographs of the storage unit, depicting the unlabeled boxes containing these records, are shown below (Figures 1-3).

Figure 1-3: MOHS Storage Unit Photographs

The notebooks were stored in boxes without consistent labeling, and only several notebooks could be associated with specific employees or time periods. These notebooks were limited to a few shelters and encompassed varying months and years. The data could not be aggregated across all MOHS shelter sites to effectively assess the total hours entered by the employees in Paycom. Overtime hours were not explicitly detailed or categorized within any notebook entries.

[3] The Former MOHS supervisor noted the City's shelter located in Baltimore County did use a time clock system temporarily.

OIG Investigation

Between Fiscal Years 2023 and 2025, the investigation found that Vendor employees worked a total of 13,304.31 overtime hours, equating to $744,559.56. The review showed that overtime hours have trended downward as the Vendor is no longer providing year-round staffing for the COVID-19 pandemic.

The investigation was limited by inconsistent documentation and the lack of a system for verifying time. Inconsistent documentation and the absence of a formal time verification system limited the investigation of the overtime hours. The investigation found that MOHS's timekeeping practices lacked a structured verification process and an organized document storage system. It is noted that after the investigation began, MOHS began including overtime sections on sign-in sheets for workers.

The OIG recommended MOHS review and develop procedures for monitoring and documenting the overtime work when staffing contracts are utilized at the shelters. MOHS responded that following the OIG's review, it revised its timekeeping procedures, including shelter sign-in sheets now including a section for recording overtime hours with supervisor confirmation. Additionally, MOHS staff will review the time submitted in Paycom by Vendor staff and compare it against the manual sign-in and sign-out sheet. MOHS did not specify a standardized method for maintaining physical records.

Sincerely,

Isabel Mercedes Cumming
Inspector General

CC: Hon. Brandon M. Scott, Mayor of Baltimore City
Hon. Zeke Cohen, Baltimore City Council President
Hon. Bill Henry, Baltimore City Comptroller
Honorable Members of the Baltimore City Council
Hon. Ebony Thompson, Baltimore City Solicitor

Mayor's Office of Homeless Services Response
Case # 24-0035-I

CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

MEMORANDUM

TO	Isabel Mercedes Cumming Inspector General
FROM	Ernestina Simmons, Executive Director, Mayor's Office of Homeless Services (MOHS)
DATE	10/23/2025
SUBJECT	24-0035-1

I have had the opportunity to review the allegation regarding two former [redacted] employees (Employee I and Employee 2) receiving compensation for an excessive number of overtime hours that were not worked. I have met with my emergency services and administrative team to discuss the concern and review the process. As acknowledged in the OIG, MOHS has revised our time verification process to include a section on our time sheet as it relates to overtime. In addition, we have added additional parameters to our process to ensure accountability for contract employees during winter shelter operations.

During the onboarding process of [redacted] staff, MOHS will provide our contractors with additional guidance regarding timekeeping. This is a two-step process for [redacted] staff which includes:

- ***Paycom****:* This is an electronic system that is required by [redacted] Staff.
- ***Manual Time Sheets***: MOHS requires contractors to use a sign in and out sheet when they arrive to the site. Contractual staff may be required to work overtime to ensure continued coverage of the site. This occurs due to several factors which includes staff arriving late to the site or unexpected call outs.

Additional steps include:

1. At the end of each shift, the supervisor or assigned MOHS personnel will use their initials to indicate they have approved the contractor's time for that day. If overtime was worked, it must be indicated on the sign in and out sheet.
2. MOHS will review the time submitted in Paycom by [redacted] staff and compare it against the manual sign in and sign out sheet that has been submitted and approved by MOHS.
3. Payment Process:
    - Vendor Submits invoice in Workday.
    - Finance Department alerts MOHS that the invoice has been received and requires review and approval.
    - MOHS Operational Specialist who oversees the winter shelter program will

compare the invoice against the manual time sheets and what was submitted by the vendor.
- The Operations Specialist will confirm or refute the hours worked and submit it to the Chief of Emergency Services.
- The Chief of Emergency Services will review the information and approve eligible items and inform the fiscal team.
- Third and Final review by fiscal team. This includes reviewing the Purchase Order number to the invoice, verifying funding availability and then process invoice(s) for payment in workday.

If you have any questions, or need any additional information, please do not hesitate to let us know.