

January 15, 2026

Superintendent Anne Kirkpatrick  
New Orleans Police Department  
1615 Poydras St., Suite 1800  
New Orleans, LA 70112

Re: New Orleans Police Department Overtime Policies, Procedures, and Practices

Dear Superintendent Kirkpatrick,

The Office of Inspector General (OIG) is authorized to comment on “rules, regulations, policies, procedures, and transactions” for the purpose of preventing fraud, waste, and abuse, or promoting efficient and effective government.<sup>1</sup> The purpose of this letter is to assess the overtime policies and procedures of the New Orleans Police Department (NOPD) from January 1, 2025 to July 31, 2025.

Ensuring public safety is one of the most important functions of any government. However, after a review of national best practices, Chief Administrative Office (CAO) policies for the City of New Orleans (City), and NOPD policies and procedures, the OIG found that the NOPD did not report the use of overtime spending in accordance with City policy. Further, the department’s distribution of overtime hours was not strictly based on the operational needs of the NOPD’s districts. This non-compliance with best practices and CAO policies jeopardizes future overtime budget planning and accountability.

As a preliminary matter, NOPD officers earned overtime pay for hours worked above the allotted regular hours. If officers worked more than 85.5 hours per pay period, they began to accrue overtime hours.<sup>2</sup> Even if an officer worked an “overtime” shift, they did not receive overtime pay unless they met the minimum required number of hours worked at regular pay. For the purpose of this letter, overtime hours are considered hours for which officers received overtime pay.

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<sup>1</sup> City Code Sec. 2-1120(2) and (10)(f).

<sup>2</sup> Civil Service Rule IV, Sec. 9.1, 9.2(a).

### THE NOPD DID NOT REPORT THE USE OF OVERTIME HOURS

According to CAO Policy Memorandum No. 69(R), which had been in effect since 1992, overtime was allowed only within the amount appropriated for the department in the City's operating budget.<sup>3</sup> The policy required all department heads to provide a monthly "overtime expenditures plan" to the CAO and obtain the CAO's approval if overtime funding was to be expended. These plans included projected overtime use for the up-coming month, as well as the rationale for and detailed descriptions of the work and the employees involved. If the department had no appropriated overtime, the department head could request funds be shifted within the department's budget to cover overtime expenses.<sup>4</sup> This policy memorandum provided for disciplinary actions against supervisory personnel who authorized non-emergency overtime expenditures.<sup>5</sup>

According to a recent LLA report, the City of New Orleans budgeted \$57,500 for the entire City for 2025. For reference, this figure was \$47,007,894 in 2024.<sup>6</sup> The City did not allocate funds for overtime to the NOPD. Analysis of ADP data for the period under consideration, though, revealed that NOPD officers worked a total of 260,182 overtime hours between January and July 2025, costing the City \$16,463,631 over and above their regular salaries.<sup>7</sup> Although City policy required departments to report the use of overtime, the NOPD contended that the department did not submit the required overtime budget reports during the scope period because the NOPD did not have an overtime budget. However, CAO Policy Memorandum 69 (R) specifically provided that if the department had no appropriated overtime, the department must work with the City and the CAO to modify its budget in order to accommodate the overtime expense. Increased transparency through submission of the required overtime expenditure plans may have prevented questions among some City leaders about how decisions to use overtime were made and how the department would ensure overtime expenditures were properly budgeted in the future.<sup>8</sup>

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<sup>3</sup> CAO Policy Memorandum No. 69(R), 1.

<sup>4</sup> Ibid.

<sup>5</sup> Ibid., 3.

<sup>6</sup> Louisiana Legislative Auditor, *City of New Orleans Budget Deficit Analysis* (Baton Rouge, LA: Louisiana Legislative Auditor, 2025), 19,  
[https://app2.llla.state.la.us/publicreports.nsf/0/2902ba587cfdaa1186258d24005bf200/\\$file/00008d9c.pdf?openelement&.7773098](https://app2.llla.state.la.us/publicreports.nsf/0/2902ba587cfdaa1186258d24005bf200/$file/00008d9c.pdf?openelement&.7773098).

<sup>7</sup> Approximately 32,138 of these hours accounting for approximately \$2,297,479 were attributable to three special security districts in the French Quarter, Mid-City, and Lakeview. NOPD expenditures for these three districts were reimbursable.

<sup>8</sup> New Orleans City Council, *2026 Proposed Budget Hearings Day 7*, October 28, 2025, 3:00:00-3:20:00,  
[https://www.youtube.com/watch?v=LijGo\\_e\\_Gsc](https://www.youtube.com/watch?v=LijGo_e_Gsc).

## **DISTRIBUTION OF OVERTIME HOURS WAS NOT ALWAYS BASED ON OPERATIONAL NEED**

As stated above, officers who worked more than 85.5 hours per pay period earned overtime pay.<sup>9</sup> Sometimes officers were required to work overtime to provide public safety at large events such as the Super Bowl or Mardi Gras, or as the result of emergency events like the January 2025 terror attack on Bourbon Street. Other times, officers requested overtime shifts that were based on the interests of their districts or divisions. The NOPD called these hours Code 25 overtime and district commanders had the decision-making authority to distribute the hours as they saw fit, including whether or not to use the hours. As such, the use of Code 25 overtime hours was discretionary. Depending on the needs of the district, Code 25 overtime might be used for case investigations, patrolling second lines, or proactive patrolling, among other things.

### *Blanket Distribution of Code 25 Overtime*

The NOPD granted Code 25 hours to each district in the Field Operations Bureau (FOB), as well as the Investigation and Support Bureau (ISB). The distribution of Code 25 overtime was not entirely based on the operational needs of the divisions and each district in the FOB automatically received approximately 120 Code 25 overtime hours per week, whether they needed that number of hours or not.

While some district commanders reported that they were usually able to abide by the 120-hour Code 25 overtime allotment, busier districts struggled to remain within the weekly distribution. For example, analysis of ADP data shows that between March and July 2025, the Fifth District regularly exceeded their Code 25 allowance. Ultimately, districts could request and receive additional hours if needed. However, the allocation remained roughly the same from week to week for each district, regardless of the historical use of overtime hours by each district. The Code 25 allocation also remained the same for districts that had separate private security patrols, paid for by the residents of those neighborhoods.

It should be noted that the Investigation and Support Bureau had no effective limit to Code 25 hours. For example, a senior officer in the homicide division told evaluators the division had been using up to 420 hours per pay period.

### *Documenting, Monitoring, and Analyzing Overtime Hours and Pay*

According to the International Association of Chiefs of Police (IACP) Model Policy, all overtime work should be coded according to the type of work performed and unit commanders were to forward the information to the appropriate personnel for recording, accounting, and analysis.<sup>10</sup> Police departments should also maintain overtime records and provide monthly reports of individual and summary data.<sup>11</sup> The Model Policy specified that data reports should be monitored

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<sup>9</sup> Civil Service Rule IV, Sec. 9.1, 9.2(a).

<sup>10</sup> International Association of Chiefs of Police, *Model Policy: Overtime* (Alexandria, VA: International Association of Chiefs of Police, 1999), 1, <https://www.theiacp.org/sites/default/files/2018-08/OvertimePolicy.pdf>.

<sup>11</sup> Ibid.

to identify unusual, unexplained, or disproportionate expenditures in overtime.<sup>12</sup> In particular, supervisors were to monitor overtime reports for unusually high number of overtime hours by individuals performing the same task, changes in overtime expenditures over time that have no clear cause, changes in overtime hourly costs, or significant overtime expenditures that consistently or unexpectedly impact the budget of a department.<sup>13</sup>

Consistent with these best practice guidelines, NOPD policy required officers to submit written overtime request forms for approval by their supervisors.<sup>14</sup> Additionally, CAO Policy Memorandum No. 69(R) required all department heads to monitor the use of overtime and provide monthly reports to the CAO.<sup>15</sup> As stated above, the NOPD did not provide these monthly reports.

Between January and July 2025, the NOPD had 55 charge codes that included overtime pay. Across all codes, NOPD paid officers \$16.5M for approximately 260,182 hours of overtime. Code 25 overtime, the discretionary overtime used by the FOB, accounted for only 41,776 hours (16 percent) of total overtime hours. Nevertheless, it was the single most used charge code for the number of hours worked. It was the second costliest code for overtime earnings at \$2.5M of total earnings (15 percent), following only Mardi Gras Parade Duty (see Table 1).

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<sup>12</sup> Ibid., 1-2.

<sup>13</sup> Ibid.

<sup>14</sup> New Orleans Policy Department, *Operations Manual, Chapter 13.15: Overtime Payment Requests*, January 14, 2018, 2, <https://nola.gov/nola/media/NOPD/Policies/Chapter-13-15-Overtime-Payment-Requests-EFFECTIVE-1-14-18.pdf>.

<sup>15</sup> CAO Policy Memorandum No. 69(R).

**Figure 1.** Top 10 Charge Codes for Overtime Hours and Earnings, Pay Periods Ending 1/11/25-7/26/25

Charge Code	Hours	Estimate Earnings	Percent Hours	Percent Earnings
Code 25 Overtime	41,776	\$2,466,214	16%	15%
Mardi Gras—Parade Route Duty	40,355	\$2,852,725	16%	17%
Super Bowl LIX	35,081	\$1,803,675	13%	11%
Mardi Gras—Non-Parade Route	19,175	\$1,310,015	7%	8%
Regular Status	18,726	\$1,130,043	7%	7%
French Quarter Task Force Patrols	18,192	\$1,362,771	7%	8%
2025 Ice Storm	17,829	\$912,309	7%	6%
Lakeview Crime Prevention District	7,500	\$522,437	3%	3%
Mid-City Security District	6,445	\$412,271	2%	3%
Red Light Camera Overtime	6,038	\$364,467	2%	2%
<b>Total of All Overtime Hours<sup>16</sup></b>	<b>260,182</b>	<b>\$16,463,631</b>	<b>100%</b>	<b>100%</b>

Officers recorded requests for overtime on NOPD Form 90 and obtained approval from their immediate supervisor or the on-duty supervisor, and their commanding officer. Yet, to the extent that Code 25 overtime was being tracked and analyzed, the consistent tracking efforts began in the latter part of 2025. According to multiple sources, the NOPD implemented a new policy that restricted the use of Code 25 overtime in September 2025. But evaluators received conflicting reports about how much and to what extent Code 25 overtime hours were tracked in the various districts prior to the policy change.

Although NOPD policy required officers to submit a “Form 90” overtime request form, it was not clear to evaluators whether this form was used to track and monitor the number of overtime hours used by the department.<sup>17</sup> According to NOPD staff, the various districts typically tracked Code 25 overtime hours through trip sheets and Code 25 Stat sheets developed by the FOB.<sup>18</sup> However, senior NOPD officials reported different timelines as to when NOPD began monitoring the use of overtime hours. Further, more than one ISB senior officer stated that they saw no reason to track or monitor overtime data because there was no overtime limit for ISB divisions.

<sup>16</sup> The grand total line includes the total number and percentage of overtime usage for all 55 NOPD charge codes that earned overtime pay. There were 45 other miscellaneous charge codes not listed on Table 1. These codes totaled 49,064 hours and \$3.3M. Each was less than 2 percent of the total number of hours.

<sup>17</sup> New Orleans Police Department, *Operations Manual*, Chapter 13.15: Overtime Payment Requests, 2.

<sup>18</sup> Trip sheets were filled out by individual officers to document all of their activity during a particular shift. The trip sheets were given to their supervisors at the ends of their shifts for the supervisors to enter the hours worked into ADP.

Despite conflicting information at the divisional level, senior NOPD officials stated the NOPD used information on Code 25 overtime hours for budgetary rather than operational purposes. Information on overtime use was sent to the Superintendent's office bi-weekly to set a baseline from which to project future budgets. This information should also have been used on monthly reports to the CAO. The lack of consistent tracking mechanisms among districts and units, however, may undermine overall departmental projections and decision making.

#### **DISTRICT- AND UNIT-LEVEL OVERSIGHT**

While the IACP provided high-level guidance on police overtime management, the U.S. General Accounting Office (GAO) provided guidance on time and attendance.<sup>19</sup> According to these guidelines, a governmental entity should have a well-defined organizational structure and a process to manage time and attendance information. As a part of that process, the entity should have clearly written policies and procedures set out the responsibilities of employees and supervisors regarding "recording, examining, approving, and reporting" time and attendance information.<sup>20</sup>

The NOPD's policy on Payroll and Timekeeping incorporated many of the City's policies for time and attendance, but included additional NOPD-specific requirements.<sup>21</sup> Notably, the NOPD's internal policies required supervisors to ensure that all shift members were accounted for and entered into the payroll system, no errors were entered into the system, work and charge codes were correct, and the correct shift was entered based on the time the officer's regular work began.<sup>22</sup> Additionally, supervisors were responsible for ensuring those under their supervision completed work assignments and that Daily Activity Sheets and Reports were complete, accurate, and thorough.<sup>23</sup> In spite of these requirements, evaluators found there was no consistent process used by supervisors across NOPD districts to verify officers worked the overtime hours they claimed.

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<sup>19</sup> United States General Accounting Office, *Maintaining Effective Control over Employee Time and Attendance Reporting* (Washington, DC: United States General Accounting Office, 2003), <https://www.gao.gov/assets/gao-03-352g.pdf>.

<sup>20</sup> Ibid., 4.

<sup>21</sup> CAO Policy Memorandum No. 72(R); New Orleans Police Department, *Operations Manual, Chapter 13.37: Payroll and Timekeeping*, December 3, 2017, <https://nola.gov/nola/media/NOPD/Policies/Chapter-13-37-Payroll-and-Timekeeping-EFFECTIVE-12-3-17.pdf>.

<sup>22</sup> New Orleans Police Department, *Operations Manual, Chapter 13.37: Payroll and Timekeeping*, 2.

<sup>23</sup> New Orleans Police Department, *Operations Manual, Chapter 11.0.1: Duties and Responsibilities of District Commanders, Supervisory Members and Officers*, 4, [https://nola.gov/nola/media/NOPD/Policies/Chapter-11-0-1-Duties-and-Responsibilities-of-District-Commanders-Sup-EFFECTIVE-11-15-19-\(1\).pdf](https://nola.gov/nola/media/NOPD/Policies/Chapter-11-0-1-Duties-and-Responsibilities-of-District-Commanders-Sup-EFFECTIVE-11-15-19-(1).pdf).

For ISB officers, oversight mechanisms relied on real-time observation by supervisors who worked alongside their subordinates and personally witnessed their work. Within the ISB, effective use of overtime was often gauged by the productivity of each officer. In this regard, there were numerous work products, such as Major Offense Report Forms, which document detectives' work at every stage of an investigation. There were also warrants issued, arrest reports, and other official work products documenting officers' work during overtime hours.

In the FOB, however, supervisors used varying mechanisms to verify whether officers reported to their overtime shifts. Some officers clocked in and out of overtime shifts, either manually or by using a biometric clock located on site. Officers also reported for roll call, just as they would for a regular shift, but this did not always happen for overtime shifts. In most divisions, the supervising officers collected trip sheets, which documented an officer's activities during the overtime shift, and used them to enter time into ADP.

Further, district supervisors in the FOB and security districts had access to GPS location data, body camera data, radios and dispatch information, and other facility cameras, all of which they could use to ensure officers were on duty during the overtime hours they claimed.<sup>24</sup> Still, it was unclear how often supervising officers used these tools and other available information to confirm officers' presence while on duty. At least one district supervisor reported that they did not actually review body camera footage of officers who were on overtime. Finally, some district supervisors raised concerns that, while overtime data was entered into the payroll system based on trip sheets, the supervisor who checked overtime work or who entered time into the payroll system might not be an officer's direct supervisor, or even the same supervisor who was on duty at the time an officer was working overtime.

This lack of internal controls and consistent oversight mechanisms to verify whether officers actually worked overtime hours claimed increased the risk of payroll fraud.

## **RECOMMENDATIONS**

The OIG recognizes NOPD made some improvements to its overtime management after the scope period for this assessment. In September 2025, NOPD instituted certain holiday and Code 25 restrictions. Most notably, NOPD set a hard limit of 120 Code 25 hours per week for each of the eight districts; 180 hours for the Special Operations Division; 120 hours per week for Violent Crime Abatement Investigative Team (VCAIT); 60 hours per week for the Gang Reduction and Intervention Partnership (GRIP); and 40 hours per week for Education and Training. Lieutenants

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<sup>24</sup> The special security districts required officers to wear bodycams, which had geolocation capabilities when turned on. The French Quarter Task Force and the Mid-City Security District also issued officers iPads while on duty, which could be tracked remotely.

were also prohibited from working Code 25 hours. In November 2025, NOPD also updated its policies and procedures regarding payroll and timekeeping. Pending revision and formal adoption into the NOPD procedures manual, the NOPD issued a General Order requiring all officers to utilize biometric timeclocks to check in for overtime duties, including security district overtime shifts. The Order further required officers to check in on the biometric timeclocks located in the District or Division where the overtime was being worked. Finally, supervisors were prohibited from using overtime to fill staffing shortages caused by improper scheduling. While these actions are important, the OIG recommends additional changes to address gaps in oversight and internal controls.

First, the NOPD should work closely with the CAO's office to ensure that the City's budget includes funding for mandatory anticipated overtime for large events like Mardi Gras, Jazz Fest, and the Sugar Bowl. Just as importantly, the NOPD and the CAO must ensure funding for overtime hours based on unanticipated events such as snow storms and terror attacks. These budget allocations should be based on the previous years' use of overtime hours, as well as unanticipated events. Next, the allocation of discretionary overtime hours should be based on the operational needs of each division. One senior officer stated that overtime hours were "use it or lose it." This type of sentiment could encourage districts to distribute overtime hours even when there was no real need to do so.

Further, all overtime pay should be more closely tracked, if NOPD is to efficiently utilize its limited resources. A more robust review of overtime use should be implemented at the immediate supervisory level, as well as the next higher level. As expounded in CAO policy and the IACP Model Policy, overtime hours should be monitored to identify unusual, unexplained, or disproportionate expenditures in overtime at several levels, including not only unit commanders and supervisors, but also agency supervisors and command personnel.<sup>25</sup> This monitoring could be done randomly and at appropriate intervals so as not to interfere in necessary police work. It could be conducted either by officers above the supervisor rank approving the overtime or it could be conducted by civilian ADP administrators. In any case, such reviews should be documented, as recommended by the IACP.<sup>26</sup> In addition, supervisory officers should make use of existing resources to conduct random reviews of overtime activity by checking GPS data, bodycam data, or other available information. Added layers of accountability lead to greater transparency and, in turn, to greater trust between the NOPD, City stakeholders, and citizens.

Finally, the NOPD should proactively share its overtime data to increase transparency and encourage faith in the department's stewardship of City funding. One way of doing this could be

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<sup>25</sup> CAO Policy Memorandum No. 69(R); International Association of Chiefs of Police, 1.

<sup>26</sup> Ibid., 1.

the creation of a publicly-accessible dashboard tracking overtime use. The City of Chicago has created such a dashboard, which is set up to update overtime usage weekly.<sup>27</sup> The department could work with the City's Office of Information Technology and Innovation to create a similar dashboard. This added layer of transparency would add yet another layer of trust among all stakeholders. If the NOPD does not regulate overtime, future budget planning and accountability will be futile.

Respectfully,

A handwritten signature in blue ink that reads "Edward Michel".

Edward Michel, CIG  
Inspector General

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<sup>27</sup> "Sworn CPD Member Overtime Summary," City of Chicago Office of Inspector General, accessed November 24, 2025, <https://igchicago.org/information-portal/data-dashboards/sworn-cpd-member-overtime/>.