

STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

REPORT OF
INVESTIGATION



AGENCY: OHIO DEPARTMENT OF EDUCATION
FILE ID NO.: 2018-CA00014
DATE OF REPORT: DECEMBER 6, 2018

The Office of the Ohio Inspector General ... The State Watchdog

“Safeguarding integrity in state government”

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Randall J. Meyer
Ohio Inspector General



STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

REPORT OF INVESTIGATION

FILE ID NUMBER: 2018-CA00014

SUBJECT NAME: Stacy Ludwig

POSITION: Education Program Specialist

AGENCY: Ohio Department of Education

BASIS FOR INVESTIGATION: Agency Referral

ALLEGATIONS: Operating a Business/Private Interest on State Time;
Misuse or Abuse of State Property or Equipment

INITIATED: February 22, 2018

DATE OF REPORT: December 6, 2018

INITIAL ALLEGATION AND COMPLAINT SUMMARY

On February 22, 2018, the Office of the Ohio Inspector General received a complaint from the Ohio Department of Education (ODE) alleging that Education Program Specialist Stacy Ludwig performed secondary or outside employment on state time. ODE officials also provided the office with supporting documentation, which included copies of Facebook postings. The Office of the Ohio Inspector General opened an investigation into this allegation upon receipt of the complaint.

BACKGROUND

Ohio Department of Education

The Ohio Department of Education oversees all public-school districts and public community schools and monitors educational service centers, early learning programs, and state-chartered nonpublic schools. ODE also administers funding to the schools, collects student data, develops academic standards and curricula, administers state achievement tests, and licenses education personnel. The department is governed by a 19-member State Board of Education with 11 elected members and eight members appointed by the governor. The board hires the Superintendent of Public Instruction who is responsible for the day-to-day operations of the department. The Ohio Department of Education is funded through general revenue funds, federal funding, and transfers from lottery profits.¹

Applicable Rules, Policies and Procedures

The following rules, policies, and procedures were reviewed as part of this investigation:

Ohio Revised Code (ORC) 102.03(D) states:

No public official or employee shall use or authorize the use of the authority or influence of office or employment to secure anything of value or the promise or offer of anything of value that is of such a character as to manifest a substantial and improper influence upon the official or employee with respect to that person's duties.

¹ Source: Biennial budget documents

The Ohio Ethics Commission (OEC) issues advisory opinions which elaborate on the interpretation of the Ohio Revised Code. OEC Advisory Opinion 96-004, interpreting ORC 102.03(D), prohibits a public official or employee who engages in private outside employment or business activity from:

- (a) using public time, facilities, personnel, or resources in conducting a private business or while engaging in private outside employment including conducting demonstrations for clients using public equipment.

ODE Human Resources Policies and Procedures Manual; 203.0, *Ethics* (Issued August 1, 2005), VIII. EMPLOYMENT OUTSIDE ODE states,

Before embarking on outside employment, ODE employees are required to obtain permission from the Office of Legal Counsel, the Office of Human Resources, their direct supervisors and other ODE leadership. The *Employment Outside of ODE* form must be submitted for approval before accepting any offer of outside work.

The policy further states that, “using any public resources in a private business” is prohibited.

ODE Human Resources Policies and Procedures Manual – 41.0 (Revised August 1, 2005) *Overtime and Compensatory Time for Overtime Eligible Employees – VI. Procedures* states,

A. General Information:

- 3. Overtime eligible employees shall not work before or after their regular work schedule or during their designated lunch period without prior authorization from their supervisor.
- 4. Employee relinquishment of break period time cannot result in overtime pay or compensatory time.

ODE Human Resources Policies and Procedures Manual – 210.0 (Revised August 10, 2017) *Work Day – Work Schedule; V. DEFINITIONS* states,

G. FLEXIBLE SCHEDULE: An alternative to a standard work schedule, also known as “flexible work hours.” Flexible schedules, or variable starting and end times, should be based on the operational needs of the office or center.

H. LUNCH OR MEAL PERIOD: Uncompensated time during which the employee must be relieved of duty and is authorized to leave the premises. The standard lunch period is 30 minutes, 45 minutes or one hour. Lunch or meal periods should be taken at approximately the midpoint of the employee's workday and cannot be regularly omitted or reduced to shorten the workday except under limited circumstances and with prior approval. Employees are not to work during lunch or meal periods unless operationally necessary and directed to do so by a supervisor. When directed to work during lunch or meal periods for operational needs, overtime eligible employees must be compensated.

K. WORK WEEK: The number of hours an employee is scheduled to work each week. The standard work-week for full-time ODE employees is 40 hours, excluding unpaid meal periods.

ODE Human Resources Policies and Procedures Manual – 210.0 (Revised August 10, 2017)

Work Day – Work Schedule; VI. PROCEDURES states,

A. CUSTOMER SERVICE HOURS AND WORK SCHEDULE

6. There must be adequate supervisory accountability during all flexible schedules and hours worked. If supervisory accountability is not feasible, certain flexible schedules will not be available options.

9. An employee's HRMS² timesheet must reflect the actual hours worked for each day that the employee flexes his or her time.

D. REPORTING HOURS WORKED – ODE EMPLOYEE TIMESHEETS

1. All employees are required to accurately complete and submit the ODE Employee Timesheet in HRMS. The timesheet must indicate the actual start and end times

² Human Resources Management System - HRMS is the system used by all Ohio Department of Education employees to report their hours worked, submit requests for leave, and submit changes to their work schedule. <http://education.ohio.gov/Miscellaneous/Employees/Human-Resources-Management-System>

(i.e., in and out times), as well as actual hours worked each day and week of each state pay period.

2. Each employee's submission of the HRMS timesheet is a certification that the hours entered are an accurate representation of hours worked.
3. Each supervisor's approval of an employee's timesheet is a certification that the supervisor had exercised appropriate oversight of the employee's hours and the hours entered are an accurate representation of hours worked by the employee. Failure of a supervisor to exercise appropriate oversight may be subject to discipline.

ODE Human Resources Policies and Procedures Manual – 300.0 (Revised April 6, 2017)

Workplace Expectations – VI. CALL-IN PROCEDURES states,

1. An Employee who is unable to report for work and who is not on a previously approved leave of absence is required to give reasonable notification to his or her supervisor. Such notification must be made within one-half hour after the employee is scheduled to report for work.

ODE's *Information Security Policy; ISP-019* (Issued January 5, 2009) Section 5.3 Personal use states,

4. Incidental personal use of ODE information systems is permissible as long as the usage does not interfere with job performance, does not deny other users access to the system resources, and does not incur a cost to the agency. Personal use of computer resources during breaks including lunch, totaling no more than 60 minutes per day is usually considered acceptable as long as it meets the previous guidelines.

INVESTIGATIVE SUMMARY

Upon opening the investigation, the Office of the Ohio Inspector General collected ODE Education Program Specialist Stacy Ludwig's personnel file, signed acknowledgements on ODE Human Resources Policies and Procedures, Information Security Policy, and Ohio Ethics Law.

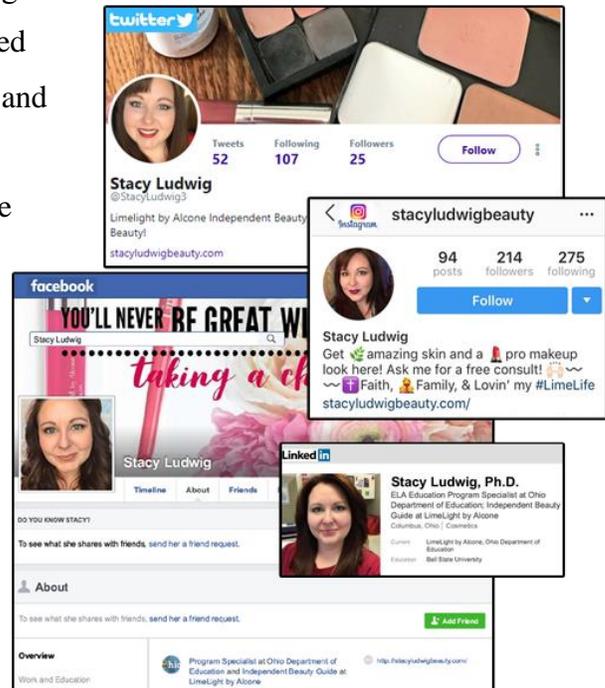
Investigators reviewed Ludwig’s assigned state laptop computer and state email account to determine if Ludwig was misusing time and utilizing state resources, facilities, and personnel, to further her outside employment.



Investigators recovered numerous photos and videos from her state-issued laptop that were posted on her personal social media accounts promoting the sales of cosmetics and skincare products. On November 16, 2017, she announced her outside employment on Facebook as an “Independent Beauty Guide³ at LimeLight by Alcone.⁴” After the investigation by the Office of the Ohio Inspector General was initiated in February 2018, Ludwig filed her *Employment Outside of ODE* form on March 29, 2018.

From February 1, 2018, to February 26, 2018, Ludwig’s internet browsing history revealed she regularly visited Facebook, Twitter, YouTube, LimeLight by Alcone, and other internet web sites related to her outside employment. Investigators found Ludwig’s YouTube channel, “Shine Forth Beauty,” contained numerous videos related to the promotion of cosmetics and skin care products from LimeLight by Alcone. In one of the videos Ludwig created on her YouTube channel, titled “Why You Should Join LimeLight by Alcone,” she states,

Yes, I work on Facebook ... I work for the Department of Education at the state level. I am making over half of what I make there



³ “Independent Beauty Guide” is a position held within the direct sales leadership structure of the brand LimeLight by Alcone. Independent beauty guides utilize social media to market cosmetics and skin-care products for LimeLight by Alcone to earn commission from their direct sales. <https://www.limelifebyalcone.com/>

⁴ LimeLight by Alcone is a direct marketing sales company specializing in cosmetics and skincare. On May 14, 2018, “LimeLight” by Alcone changed its name to “LimeLife” by Alcone “to be in compliance with international regulations and trademark restrictions” to accommodate their expansion as a national business to international. <http://kristengwalsh.com/limelight-changes-name-to-limelife-by-alcone/>

in my second month, so I know I am well on my way to making this a career instead of corporate America.

In total, Ludwig's laptop contained 26 video files that totaled six hours and 54 minutes in which she promoted her outside employment.

Investigators identified Ludwig's work and non-work related websites and sorted them into separate browsing sessions. For this investigation, investigators defined "browsing sessions" as periods of user activity separated by a minimum of 10 minutes of user inactivity. An analysis of these browsing sessions revealed that Ludwig used her ODE laptop during her reported regular work hours for outside employment purposes. Furthermore, investigators determined Ludwig utilized state resources to further her outside employment during non-work hours.

ODE's *Information Security Policy; ISP-019* (Issued January 5, 2009) Section 5.3.4 allows for "... personal use of computer resources during breaks including lunch, totaling no more than 60 minutes per day." However, ODE HR Policy and Procedures Manual; 203.0, *Ethics* (Issued August 1, 2005), VIII. EMPLOYMENT OUTSIDE ODE prohibits "using any public resources in a private business."

Misuse of State Time and Resources

On December 1, 2017, at 7:58 a.m., Ludwig sent an email to ODE Program Administrator 2 Julie Dick for inclusion in the officewide announcements. [\(Exhibit 1\)](#) Dick was responsible for office communications, and at 8:47 a.m., Dick sent an officewide announcement via email with the invitation from Ludwig to "come watch or join in" on "a makeover with Limelight by Alcone" which Ludwig was presenting in the lunchroom. [\(Exhibit 2\)](#) Investigators asked Ludwig if anyone purchased products related to the December 1, 2017, lunch makeover event, to which Ludwig replied, "Yes."

A review of Ludwig's timesheet covering the week of December 1st showed that she claimed a 30-minute lunch on December 1, when the invitation stated that the makeover demonstration was scheduled from "Noon to 1p.m." Investigators noted that Ludwig did not claim any lunch breaks for the remainder of that week.

On February 7, Ludwig sent an email to a co-worker that stated, “I will not be in today because school was canceled. I’m home with my kids.” According to Ludwig’s timesheet, she claimed eight hours of regular scheduled work time on that day, noting her start time was at 8:00 a.m. and her end time was at 5:00 p.m. with a one-hour lunch break from 1:00 p.m. to 2:00 p.m. When investigators questioned Assistant Director of ODE’s Office of Curriculum and Assessment Kirk Ross, who was Ludwig’s direct supervisor, he stated that he could neither recall nor produce any record of communication between himself and Ludwig in which she requested to work from home on that day. The ODE Human Resources Policies and Procedures Manual call-in procedure requires employees to notify their supervisor if they are unable to report to work. Ludwig’s browser history on February 7, shown below, revealed almost six hours of activity related to her outside employment.

Wednesday, February 7, 2018		
Time		Event
		NO CARD SWIPE
8:00 AM		Timesheet Start
11:56 AM		Facebook Post - "Hope you love them as much as I do... Thank You for Your Order"
1:00 PM		Lunch Break Start
2:00 PM		Lunch Break End
2:55 PM		Browsing Session 1 Start
		- Sign in - LimeLight by Alcone
		- Fempire - Official Facebook Group for Limelight by Alcone - Facebook Group
		- Payment - LimeLight by Alcone
		- The Wander Tribe - Opportunity Page for Limelight by Alcone – Facebook Group
		- Orders - LimeLight by Alcone
5:00 PM		Timesheet End
		- The FACE Crew - Business Breakdown w/ LimeLight Ambassador – Facebook Group
		- Training: how to get the most out of an online event
		- Checkout - LimeLight by Alcone
		- Fempire - Official Facebook Group for Limelight by Alcone - Facebook Group
8:03 PM		Browsing Session 1 End
		Total: 5:08:40
8:18 PM		Browsing Session 2 Start
		- Stacy Ludwig - Updated her profile picture
8:24 PM		Browsing Session 2 End
		Total: 0:06:32
9:01 PM		Browsing Session 3 Start
		- Sign in - LimeLight by Alcone
		- Payment - LimeLight by Alcone
		- Orders - LimeLight by Alcone
		- Parties - LimeLight by Alcone
		- Facebook Messenger
9:33 PM		Browsing Session 3 End
		Total: 0:32:43

 Denotes Time Ludwig Reported as ODE Regular Work Time

On February 21, Ludwig emailed Ross requesting permission to work from home. She stated in her email, “Will you approve 10 hours max comp time for me this week to work on getting the model curriculum done?” Ross approved Ludwig’s request and replied, “Thank you for being willing to put in the OT on the project.” On February 21, Ludwig claimed 12.1 hours of ODE work time and on February 22, she claimed 13.7 hours of ODE work time. Investigators found that Ludwig’s browser history on her ODE-issued laptop showed more than 14 hours of activity related to her outside employment for the week of February 19 while being compensated by ODE. [\(Exhibit 3\)](#) Investigators also reviewed Ludwig’s timesheets and pay stubs and confirmed she received compensatory time for the hours she reported during this pay period.

The following chart illustrates the total time that Ludwig utilized state resources for outside employment from February 1 to February 26, 2018.

Category	Time
Ludwig Reported ODE Work Hours While Conducting Outside Employment (Using ODE laptop, network, facilities)	44 Hours 40 Minutes
Ludwig Used ODE Resources During Non-Working Hours (Using ODE laptop)	18 Hours 24 Minutes
TOTAL	63 Hours 04 Minutes

The Office of the Ohio Inspector General subpoenaed LimeLight by Alcone for financial records relating to Ludwig. The records showed Ludwig had earned \$6,995.15 in commission payments between November 16, 2017, and July 18, 2018. Additionally, Ludwig worked on numerous orders and payments for customers during hours she claimed to be working for the State of Ohio.

Date Accepted	Month Accounted For	Commission Total
1/1/2018	December-17	\$ 573.80
2/1/2018	January-18	1,067.12
3/1/2018	February-18	909.64
4/1/2018	March-18	907.74
5/1/2018	April-18	825.05
6/1/2018	May-18	891.48
7/1/2018	June-18	944.72
8/1/2018	July-18	875.60
	TOTAL	\$6,995.15

On September 14, Ludwig’s computer was again collected and analyzed to determine if Ludwig continued to utilize state resources to further her outside employment. Investigators did not find evidence of continued use of state resources to further her outside employment.

Additional Issues

During the course of the investigation, the Office of the Ohio Inspector General noted that Ludwig only claimed lunch breaks on three occasions from February 1 to February 26, 2018, and 10 percent of her workdays in 2017. ODE Human Resources Policies and Procedures Manual – 210.0 states that a 30, 45, or 60-minute lunch period is required to be recorded as uncompensated time and cannot regularly be omitted or reduced to shorten the workday. However, from Monday, February 5 to Friday, February 9, 2018, investigators discovered Ludwig had flexed her ODE work hours during the 40-hour week in order to minimize the eight hours of vacation time she would have needed to use on February 9, 2018. Specifically, Ludwig reported to have worked over eight hours for three days that week, subsequently reducing the amount of vacation leave she would have needed to use on Friday, February 9, 2018. Also, during that week, Ludwig did not report a lunch break on each of these three days and had left work early.

Table 2 illustrates how Ludwig flexed her ODE work hours during the week of February 5 – February 9, 2018, in order to reduce the amount of vacation time she would have needed to use on Friday, February 9, 2018.

Table 2

Date	Hours / Time Claimed	Flex Time +Earn/-Use	Flex Time Total	Regular Time In	Lunch Time Out	Lunch Time In	Regular Time Out
2/5/2018	8.1	+0.1	+0.1	7:15 AM			3:20 PM
2/6/2018	8.3	+0.3	+0.4	7:00 AM			3:20 PM
2/7/2018	8.0	0.0	+0.4	8:00 AM	1:00 PM	2:00 PM	5:00 PM
2/8/2018	8.2	+0.2	+0.6	7:05 AM			3:15 PM
2/9/2018	7.4	-0.6	0.0	Vacation			Vacation

Investigators reviewed screenshots from Ludwig's Facebook page where she posted pictures of herself from her work location at ODE on state time, promoting her outside employment. During Ludwig's interview, investigators asked if these pictures were taken in her modular work area. Ludwig's response was "Yes, they were"



Investigators questioned Ludwig about her lunch breaks and how she spent her time during her breaks. Ludwig responded, "No, I leave ... my supervisor knows when my break is and I'm not in the building during my break."

On April 2, 2018, investigators interviewed Assistant Director of ODE's Office of Curriculum and Assessment Kirk Ross, who was Ludwig's direct supervisor. Investigators asked Ross about his responsibility as a supervisor to Ludwig, and specifically about Ludwig's lunch breaks. Ross stated that at that time, Ludwig did not have permission to work through lunch. Investigators then asked if Ludwig left the building during her lunch breaks, and Ross stated that he "can't recall her leaving, no."

Investigators asked Ross why Ludwig did not regularly claim lunch breaks. Ross replied that he did not know if Ludwig was or was not claiming a lunch period, and explained that supervisors were required to approve timesheets that did not display the start and end times for an employee's workday or lunch period. However, investigators confirmed with ODE that employees entered their start and end times of the workday as well as lunch periods (Image 1). ODE policy states that "Each supervisor's approval of an employee's timesheet is a certification that the supervisor has exercised appropriate oversight of the employee's hours and the hours entered are an accurate representation of hours worked by the employee." Image 2

Image 1

Enter Working Hours:

July 30, 2018
[Jump to today](#)

IN	07:30 AM
BEGIN LUNCH	11:30 AM
END LUNCH	12:00 PM
OUT	04:00 PM
IN	

COMMENTS:

✖ Clear ✔ Save

Regular Working Total:	8.0
Leave Requests:	0.0
TOTAL:	8.0

illustrates what an ODE supervisor is able to see when approving an employee’s timesheet. Investigators noted the lack of detail in tracking lunch hours, start time, end time, etc. Therefore, the HRMS system that managers are required to use when approving an employee’s timesheet lacks sufficient details necessary for adequately reviewing an employee’s claimed workday.

Image 2

Pay Period: 07/08/2018 - 07/21/2018							
✓ Approve		✗ Reject		✗ Close		< Prev 1 of 1 selected timecards. Next >	
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Total
7/18/2018	7/19/2018	7/10/2018	7/11/2018	7/12/2018	7/13/2018	7/14/2018	Total hours: 40
	8-Regular Hours	8-Regular Hours	8-Regular Hours	8-Regular Hours	8-Regular Hours		
7/15/2018	7/16/2018	7/17/2018	7/18/2018	7/19/2018	7/20/2018	7/21/2018	Total hours: 49.5
	6-Regular Hours	8-Regular Hours	8-Regular Hours 1.5-Overtime Hours	8-Regular Hours 2-Overtime Hours	8-Regular Hours 0.5-Overtime Hours	2-Regular Hours 5.5-Overtime Hours	

CONCLUSION

The Office of the Ohio Inspector General received a complaint from the Ohio Department of Education alleging Stacy Ludwig was conducting outside employment during times she was being paid to work for ODE, and using state facilities, personnel, and resources. Contrary to ODE policy and Ohio Ethics Law 102.03, investigators found that Ludwig used ODE time, resources, and office space to market and sell cosmetics for her outside employment in excess of 63 hours in 26 days.

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

The *Employment Outside of ODE* form is required to be completed by ODE employees and approved prior to accepting outside employment. Ludwig failed to complete an *Employment Outside of ODE* form when she first began working for Limelight by Alcone. Ludwig filed her *Employment Outside of ODE* form on March 29th, 2018; however, Ludwig began working as an “Independent Beauty Guide” on November 16, 2017.

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

ODE Human Resources Policies and Procedures Manual – 210.0 requires that an employee “... takes a minimum of 30-minutes of uncompensated lunch.” Additionally, ODE Human Resources Policies and Procedures Manual – 41.0 states that time not claimed as a “break period” cannot result in overtime pay or compensatory time. Ludwig regularly omitted uncompensated lunch breaks and included the time as part of her regular ODE work hours.

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

ODE Human Resources Policies and Procedures Manual – 300.0 (Revised April 6, 2017) Workplace Expectations – VI. CALL-IN PROCEDURES requires an employee who is unable to report for work to give reasonable notification to his or her supervisor. Neither Ross nor Ludwig could produce a record of communication stating that Ludwig had requested to work from home on February 7, 2018.

Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

Although Ludwig did not accurately reflect her ODE hours worked, supervisors are required to apply appropriate oversight of the employee’s reported workday, as stated in ODE Human Resources Policies and Procedures Manual – 210.0 Section VI. PROCEDURES D.3. However, because ODE’s HRMS application is limited and does not provide ODE employees’ start and end times for supervisory review, ODE supervisors are unable to provide appropriate oversight of employees as required by this policy requirement.

Accordingly, the Office of the Ohio Inspector General does not find reasonable cause to believe a wrongful act or omission occurred in this instance.

RECOMMENDATION(S)

The Office of the Ohio Inspector General makes the following recommendations and asks the superintendent of the Ohio Department of Education to respond within 60 days with a plan detailing how the recommendations will be implemented. The Ohio Department of Education should:

1. Review the activity of Education Program Specialist Stacy Ludwig as detailed in this report and determine if administrative action is warranted.
2. Review timesheet approval processes and consider providing to supervisors the reported work hours of employees, specifically their start and end times, for evaluation and approval.

REFERRALS

This report of investigation has been provided to the Franklin County Prosecutor's Office, the City of Columbus Prosecuting Attorney, and the Ohio Ethics Commission for consideration.



STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

NAME OF REPORT: Ohio Department of Education

FILE ID #: 2018-CA00014

KEEPER OF RECORDS CERTIFICATION

This is a true and correct copy of the report which is required to be prepared by the Office of the Ohio Inspector General pursuant to Section 121.42 of the Ohio Revised Code.

Jill Jones
KEEPER OF RECORDS

CERTIFIED
December 6, 2018

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