



November 7, 2007

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VICE PRESIDENT, SOUTHWEST AREA OPERATIONS

SUBJECT: Audit Report – The Postal Service’s Violence Prevention and Response Programs in Three Southwest Area Performance Clusters
(Report Number HM-AR-08-003)

This report presents the results of the U.S. Postal Service Office of Inspector General’s (OIG) self-initiated audit of the Postal Service’s violence prevention and response programs in three Southwest Area Performance Clusters (PC) (Project Number 06YG044HM004). The Southwest Area was one of five areas judgmentally selected from the nine Postal Service areas of operation.¹ Our overall objective was to determine if the violence prevention and response programs in the Albuquerque, Dallas, and Fort Worth PCs effectively reduced the potential for violence. Specifically, we determined whether (1) the PCs implemented required controls (policies and procedures) to reduce the potential for violence and (2) oversight of the workplace violence prevention program at the area and PC levels was adequate.

This report is the third in a series of six reports we will issue on the violence prevention and response programs in 15 PCs. The sixth report will summarize the conditions reported in all 15 PCs, management’s actions to correct the conditions, and issues identified with nationwide impact.

We concluded the Albuquerque, Dallas, and Fort Worth PCs established threat assessment teams (TAT) and took some positive steps to reduce the potential for violence such as conducting climate assessments and Voice of the Employee (VOE)² focus groups. However, the PCs’ violence prevention and response programs may not be fully effective in reducing the potential for violence because the district and plant managers (PC managers) and the TATs did not implement many of the required policies and procedures to reduce the potential for violence. In addition, the Southwest Area and PC managers did not provide adequate oversight of the violence prevention and response programs to ensure compliance with policies and procedures.

This report includes 14 recommendations to help the Southwest Area, its PCs, and its TATs improve the effectiveness of the violence prevention and response program.

¹ The five areas reviewed were Capital Metro, Northeast, Pacific, Southeast, and Southwest.

² The VOE Survey is a data collection instrument used to obtain information from career employees regarding how they feel about their workplace environment. The Postal Service uses this information in a number of ways, to include ensuring employees feel safe in their workplaces.

Implementation of these recommendations will also improve the safety and security of employees and prevent harm to the Postal Service's reputation (goodwill). We will report these non-monetary impacts in our *Semiannual Report to Congress*.

Management agreed to implement all 14 recommendations, and the actions taken or planned should correct the issues identified. Management's comments and our evaluation of these comments are included in the report.

Background

The Postal Service has long recognized the importance of ensuring the safety of its employees by creating and maintaining a work environment that is violence-free. In addition, the agency is obligated under the Occupational Safety and Health Administration's (OSHA) "General Duty" clause to provide a safe and healthful working environment for all workers covered by the Occupational Safety and Health Act (the OSH Act) of 1970. To prevent violence in the workplace and minimize the potential risk the Postal Service established the following criteria:

- The *Administrative Support Manual (ASM)* requires security control officers or their designees to conduct annual facility security reviews.
- The Joint Statement on Violence and Behavior in the Workplace (Joint Statement) signed by union and management association presidents and the Deputy Postmaster General in 1992 states the Postal Service will not tolerate violent and inappropriate behavior by anyone, at any level. (See Appendix B for a copy of the Joint Statement.)
- The *Threat Assessment Team Guide* (Publication 108) requires TATs to assess and respond to violent and potentially violent situations. The guide outlines six strategies designed to assist the TATs: (1) selection, (2) security, (3) communication of policy, (4) environment and culture, (5) employee support, and (6) separation.

The strategies are an integral part of the Postal Service's *Strategic Transformation Plan 2006 - 2010* which identifies engaging and motivating the workforce as one of its goals. A key transformation strategy for achieving this goal is maintaining a safe work environment for all employees. This audit reviewed implementation of three of the six strategies—security, communication of policy, and environment and culture.

Objectives, Scope and Methodology

We discuss our objectives, scope and methodology in detail in Appendix C.

Prior Audit Coverage

We discuss prior audit coverage in Appendix D.

Results

The following summarizes our findings and recommendations regarding the Albuquerque, Dallas, and Fort Worth PCs' violence prevention and response programs. Additional details regarding our findings are in Appendix E.

Security Strategy - Ensure appropriate safeguards for employees, customers, and property.

The three PCs may not have ensured that facilities had appropriate security safeguards in place. The Albuquerque, Dallas, and Fort Worth PC security coordinators stated that corrective actions were taken on the security and safety deficiencies identified at facilities within the three PCs in fiscal year (FY) 2006. However, [REDACTED] did not maintain documentation regarding the actions taken or how the actions corrected the deficiencies.

Appropriate security safeguards assist in preventing violence in the workplace. One such safeguard is preventing unauthorized individuals from gaining access to postal facilities by securing doors. The FY 2006 VOE Survey results for the Albuquerque, Dallas, and Fort Worth PCs indicate that numerous employees were concerned that unauthorized individuals could gain access to facilities in their PCs. (See Appendices F, G, and H for additional details regarding VOE Survey responses.)

In FY 2007, the Southwest Area security coordinator took corrective action to ensure documentation was maintained. We are making no recommendations in this area since management's corrective actions addressed the security issues.

Communication of Policy Strategy - Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.

Zero Tolerance Policy Postings Could be Improved

The three PCs disseminated copies of their current local zero tolerance policy to all PC employees in FY 2006 through stand-up talks and new employee orientation classes. However, management could improve their procedures for posting their zero tolerance policy, which sometimes was not posted at all, was not current, or was not complete.

Properly posting the zero tolerance policy may reduce the potential for violence in the workplace. For example, posting the current policy makes important information available on the workroom floor, where employees may need it most.

Corrective Action

As a result of this audit, [REDACTED] PC updated its zero tolerance policy on March 15, 2007. The policy included procedures for employees to report incidents and instructions for posting the policy in PC facilities. In addition, [REDACTED] the policy was mailed on March 30, 2007, to all PC employees. The policy did not, however, include the lead plant manager's signature. When both PC managers sign the zero tolerance policy, it reaffirms to all employees the managers' commitment to a violence free workplace.

Recommendations

We recommend the Vice President, Southwest Area Operations:

1. Direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to implement an internal control to ensure their current zero tolerance policy is properly posted in all facilities, at least annually. For example, facility managers could provide written annual certifications to the performance cluster threat assessment teams.
2. Direct [REDACTED] Performance Cluster managers to update their zero tolerance policy to include the lead plant manager's signature.

Workplace Violence Awareness Training Needed for Some Employees

The Albuquerque, Dallas, and Fort Worth PC and Human Resources (HR) managers ensured most employees and TAT core members³ received the required training. However, the HR managers did not ensure that all managers, supervisors, and 204b supervisors⁴ received the required 8-hour (one-time) workplace violence awareness training.

Postal Service employees who do not receive this training may not be effective in recognizing, preventing, and responding to violent and potentially violent situations.

Recommendations

We recommend the Vice President, Southwest Area Operations:

3. Notify the Albuquerque, Dallas, and Fort Worth Performance Cluster managers that workplace violence awareness training is a fiscal year mandatory requirement, and it is their responsibility to ensure that training occurs, preferably during non-peak operational periods.

³ TAT core members include the HR manager or designee, labor relations manager, medical director or occupational health nurse administrator, district manager or designee, and lead plant manager or designee.

⁴ A 204b supervisor is a bargaining employee detailed to an acting supervisor position.

4. Direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to determine which managers, supervisors, and 204b supervisors have not received the 8-hour (one-time) workplace violence awareness training, and provide the training as soon as possible.
5. Instruct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to:
 - Remind Human Resources managers of their responsibility to conduct periodic reviews (at least quarterly)⁵ to determine if management has met the mandatory workplace violence awareness training requirements for all employees (including 204b supervisors).
 - Implement a control to ensure Human Resources managers conduct periodic reviews to determine which managers and supervisors did not receive the violence awareness training.

Strategies to Enforce Postal Policy Not Fully Implemented

The Albuquerque, Dallas, and Fort Worth TATs did not fully implement violence prevention strategies to ensure incidents of violent and inappropriate behavior were fully addressed in accordance with the TAT Guide. We identified 14⁶ incidents reported to the [REDACTED] TATs in FY 2006 and determined these incidents were not properly addressed in accordance with the TAT Guide. Incidents reported to the Albuquerque TAT were not documented (no incident case files) and may not have been addressed.

Opportunities to prevent a violent incident from occurring diminish when management does not fully implement violence prevention strategies to properly address potentially violent incidents. In addition, management needs to appropriately and immediately respond to potentially violent incidents. For example, VOE Survey quarterly reports for the three PCs indicate many employees were concerned they were working in an unsafe environment and could be victims of physical violence.

Recommendations

We recommend the Vice President, Southwest Area Operations:

6. Remind the Albuquerque, Dallas, and Fort Worth Performance Cluster managers of their responsibility to ensure threat assessment teams comply with the *Threat Assessment Team Guide* when responding to and resolving incidents of violent and inappropriate behavior.

⁵ Quarterly reviews would provide sufficient time to schedule employees for training within the fiscal year it is required.

⁶ We reviewed seven [REDACTED] and seven [REDACTED] PC incidents.

7. Direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to implement a control to ensure threat assessment teams comply with the *Threat Assessment Team Guide* when responding to and assessing reports of potentially violent situations and inappropriate behavior.
8. Direct the Albuquerque, Dallas, and Fort Worth threat assessment teams to review the incidents that had insufficient or no supporting documentation and determine if they were resolved in accordance with the *Threat Assessment Team Guide*.

Environment and Culture Strategy - Create a work setting and maintain an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.

Monitoring and Evaluating Workplace Climate Indicators

The three PC HR managers took positive steps toward creating an atmosphere perceived to be fair and free from unlawful and inappropriate behavior. For example, two HR managers disseminated zero tolerance policies to all employees and all three HR managers provided some formal employee training. The HR managers also monitored and evaluated VOE Survey scores and focus groups, numbers of grievances and Equal Employment Opportunity (EEO) complaints, climate assessments, and Flash Reports⁷ to identify events that could escalate the potential for violence. However, the managers did not document how (or how often) they monitored and evaluated climate indicators, other than their quarterly monitoring and evaluation of the VOE Survey results.

Effective monitoring can create a work setting and atmosphere that is perceived to be fair and free from unlawful and inappropriate behavior. For example, documenting the evaluation of climate indicators from previous quarters allows management to identify trends and hotspots to reduce the potential for violence. While the VOE Survey is an important indicator of the workplace climate, it only reports results at the facility level when 10 or more employees respond. In that regard, the VOE Survey should not be the only climate indicator documented because it does not represent all facilities.

In addition, we reviewed 35 complaints the OIG Hotline received during FY 2006 and found that some employees in these PCs reported workplace environment issues. Some of these employees sent their workplace environment complaints to the OIG because they believed they had exhausted all avenues for resolution in their workplace. We believe employees could view work sites where management proactively moderates the risk of violent situations as the agency's commitment to the zero tolerance policy.

⁷ A Flash Report is an operations report for a specific facility that shows workhour usage, productivity, sick leave, and overtime rates for that facility.

Recommendation

We recommend the Vice President, Southwest Area Operations:

9. Direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to ensure the threat assessment teams document their evaluations of climate indicators to identify trends and hotspots.

Team Process and Performance Measures Could be Improved

TAT Members, Meetings, and Minutes

The three TATs had the requisite number and type of team members. [REDACTED] TAT consistently conducted quarterly⁸ meetings, and properly prepared and disseminated meeting minutes to the required TAT members, per the TAT Guide. However, the [REDACTED] TATs did not consistently conduct quarterly meetings and properly prepare and disseminate minutes.

A TAT not conducting and properly documenting meetings runs the risk of not achieving the TAT's primary mission—preventing workplace violence.

Corrective Action

The Postal Service Headquarters Employee Assistance Program (EAP)/Workplace Environment Improvement (WEI) office established a web-based TAT Membership and Meeting Tool to ensure management conducts and documents TAT meetings, and disseminates meeting minutes in accordance with the TAT Guide. Effective March 2007, each PC is required to timely update the information for their TAT.

Recommendation

We recommend the Vice President, Southwest Area Operations, direct the Albuquerque and Dallas Performance Cluster managers to:

10. Remind the Human Resources managers of their responsibility to conduct meetings, and properly document and disseminate the minutes to the appropriate threat assessment team members.

TAT Performance Measures

The [REDACTED] HR managers stated they implemented performance measures such as verbal feedback from employees and informal TAT discussions to gauge whether the TATs were successful or needed to change their processes. However, management did not document the measures and the measures may not be

⁸ The Postal Service modified the TAT Guide in March 2007 to require meetings twice a quarter.

adequate. The [REDACTED] TAT did not discuss or establish measures to evaluate the team's performance.

TATs cannot provide assurance that their efforts to prevent violent incidents in the workplace were successful or needed improvement when the measures used are not documented. In addition, using the primary measures suggested in the TAT Guide may provide more useful information to identify areas for TAT improvement.

Recommendations

We recommend the Vice President, Southwest Area Operations, instruct the Albuquerque Performance Cluster managers to:

11. Direct the threat assessment team to implement performance measures to gauge whether the team's efforts and processes to prevent violent incidents in the workplace are successful or need improvement.

We also recommend the Vice President, Southwest Area Operations, direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to:

12. Implement controls to ensure threat assessment teams document the processes used to measure the teams' performance, as required by the *Threat Assessment Team Guide*, and ensure the measurements used are adequate for determining success and identifying areas for improvement.

Oversight of the Workplace Violence Prevention Program

Our review of TAT activities indicated the Albuquerque, Dallas, and Fort Worth PC and Southwest Area HR managers did not provide adequate oversight of the violence prevention and response programs. The PC managers did not ensure the three TATs implemented many of the required policies and procedures to reduce the potential for violence related to security, communication of policy, and the environment and culture. The PC and HR managers also did not ensure TATs followed appropriate processes and documented performance measures.

Adequate oversight at the area and PC levels could reduce the potential for violence. Specifically, when TATs do not follow important workplace violence prevention and response program policies and procedures, the teams may not be fully effective in reducing the potential for violence.

The internal controls recommended in this report for the Albuquerque, Dallas, and Fort Worth PC managers, if implemented, should provide sufficient oversight of the TATs at the PC level. As a result, we have no additional recommendations for PC managers regarding communication of policy and environment and culture strategies.

Recommendations

We recommend the Vice President, Southwest Area Operations:

13. Implement an internal control to ensure Southwest Area Performance Cluster managers provide adequate oversight of their threat assessment teams to improve the effectiveness of the violence prevention and response programs. For example, performance cluster managers could provide the area Vice President with an annual certification that the teams are conducting business in accordance with the *Threat Assessment Team Guide* and related Postal Service policies.
14. Determine if the findings in this report exist in the remaining Southwest Area Performance Clusters - Arkansas, Houston, Louisiana, Oklahoma, and Rio Grande - and, where necessary, take action to ensure management implements adequate controls.

Management's Comments

Management agreed with all but one of the findings. Specifically, management stated in the response for recommendation 2 there was no requirement in either the 2002 or 2007 TAT Guides for the lead plant manager to sign the zero tolerance policy. Management acknowledged, however, that the sample policy statements in both guides provide a place for that signature, and they agreed to implement the recommendation.

Management agreed to implement the other 13 recommendations but did not provide completion dates for their corrective actions taken or planned.

In subsequent correspondence, management also agreed with the non-monetary impact we reported. Management's comments, in their entirety, are included in Appendix I.

Evaluation of Management's Comments

Management's comments are responsive, and the actions taken or planned should correct the issues identified in the findings. We encourage management to establish completion dates for corrective actions, which will help to ensure actions are taken.

We disagree with management's statement that there is no requirement in the TAT Guides for the lead plant manager's signature on the local zero tolerance policy. While there is not a specific statement in the TAT Guides that the lead plant manager must sign, the guides direct the reader to the sample policy statements, which refer to leadership as "we" in several locations and include space at the bottom of the statements for the signatures of both the district and lead plant managers.

The OIG considers recommendations 1 through 5, 7 through 9, and 11 through 14 significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These recommendations should not be closed in the follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

We appreciate the cooperation and courtesies provided by your staff during the audit. If you have any questions or need additional information, please contact Chris Nicoloff, Director, Human Capital, or me at (703) 248-2100.

E-Signed by Darrell E. Benjamin, 
VERIFY authenticity with ApproveIt

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Attachments

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APPENDIX A. ACRONYMS

ASAP	Area Security Assessment Program
ASM	Administrative Support Manual
EAP	Employee Assistance Program
EEO	Equal Employment Opportunity
FOIA	Freedom of Information Act
FY	Fiscal Year
HR	Human Resources
NTD	National Training Database
OIG	U.S. Postal Service Office of Inspector General
OSHA	Occupational Safety and Health Administration
OSH Act	Occupational Safety and Health Act
PC	Performance Cluster
TAT	Threat Assessment Team
VOE	Voice of the Employee
WebEIS	Web-Enabled Enterprise Information System
WEI	Workplace Environment Improvement
WIA	Workplace Improvement Analyst

APPENDIX B. JOINT STATEMENT ON VIOLENCE AND BEHAVIOR IN THE WORKPLACE

M-01242

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JOINT STATEMENT ON VIOLENCE AND BEHAVIOR IN THE WORKPLACE

We all grieve for the Royal Oak victims, and we sympathize with their families, as we have grieved and sympathized all too often before in similar horrifying circumstances. But grief and sympathy are not enough. Neither are ritualistic expressions of grave concern or the initiation of investigations, studies, or research projects.

The United States Postal Service as an institution and all of us who serve that institution must firmly and unequivocally commit to do everything within our power to prevent further incidents of work-related violence.

This is a time for a candid appraisal of our flaws and not a time for scapegoating, fingerpointing, or procrastination. It is a time for reaffirming the basic right of all employees to a safe and humane working environment. *It is also the time to take action to show that we mean what we say.*

We openly acknowledge that in some places or units there is an unacceptable level of stress in the workplace; that there is no excuse for and will be no tolerance of violence or any threats of violence by anyone at any level of the Postal Service; and that there is no excuse for and will be no tolerance of harassment, intimidation, threats, or bullying by anyone.

We also affirm that every employee at every level of the Postal Service should be treated at all times with dignity, respect, and fairness. The need for the USPS to serve the public efficiently and productively, and the need for all employees to be committed to giving a fair day's work for a fair day's pay, does not justify actions that are abusive or intolerant. *"Making the numbers" is not an excuse for the abuse of anyone.* Those who do not treat others with dignity and respect will not be rewarded or promoted. Those whose unacceptable behavior continues will be removed from their positions.

We obviously cannot ensure that however seriously intentioned our words may be, they will not be treated with winks and nods, or skepticism, by some of our over 700,000 employees. But let there be no mistake that we mean what we say and we will enforce our commitment to a workplace where dignity, respect, and fairness are basic human rights, and where those who do not respect those rights are not tolerated.

Our intention is to make the workroom floor a safer, more harmonious, as well as a more productive workplace. We pledge our efforts to these objectives.

D.C. Nurses Association

Federation of Postal Police Officers

National Association of Letter Carriers

National Postal Mail Handlers Union

United States Postal Service

National Association of Postal Supervisors

National Association of Postmasters of the United States

National League of Postmasters of the United States

National Rural Letter Carriers' Association

Dated: February 14, 1992

PLEASE POST ON BULLETIN BOARDS IN ALL INSTALLATIONS

APPENDIX C. OBJECTIVES, SCOPE, AND METHODOLOGY

The overall objective of this audit was to determine if the Postal Service's violence prevention and response programs in selected locations were effective in reducing the potential for violence. Specifically, we determined whether (1) the Albuquerque, Dallas, and Fort Worth PCs implemented required controls (policies and procedures) to reduce the potential for violence and (2) oversight of the workplace violence prevention program at the area and PC levels was adequate.⁹

To evaluate the workplace violence prevention and response program in the Southwest Area, we judgmentally selected the Albuquerque, Dallas, and Fort Worth PCs from the eight PCs in the Southwest Area. We selected these PCs based on an analysis of seven workplace environment climate indicators for FYs 2004 through 2006.¹⁰ We took steps to ensure the sample was representative of PCs where the indicators show the climate was good and where the climate was troubled. We also considered whether the PC appeared on the Postal Service's troubled worksite list¹¹ and whether the OIG conducted prior workplace environment audits in the PC. Finally, we reviewed the FY 2006 Area Security Assessment Program (ASAP) reviews to determine the deficiencies identified and if the PCs took actions to correct them.¹²

We interviewed the PCs' HR, Labor Relations, and Training Managers; the Workplace Improvement Analysts (WIA); and the area's HR manager and analyst to determine whether (1) the selected PCs had implemented required controls to reduce the potential for violence and (2) Postal Service internal controls existed to provide adequate oversight of the program at the area and PC levels. We also reviewed the TAT and safety meeting minutes, conference agendas, and reports used to monitor and enforce policies and procedures to reduce violence in the workplace. In addition, we reviewed the TAT Guide, the ASM, the Joint Statement, and the OSHA "General Duty" clause to provide a safe and healthful working environment for all workers covered by the OSH Act of 1970.

We reviewed the following data and information pertaining to the PCs' activities related to the violence prevention and response program:

- Zero tolerance policies and action plans.
- VOE Vital Few List.¹³
- Attendance records for required workplace violence awareness training.

⁹ We will address oversight at the headquarters level in a separate report.

¹⁰ The seven climate indicators are the VOE Survey scores, grievances, EEO complaints, EAP referrals, climate assessments, OIG Hotline complaints, and OIG congressional inquiries regarding workplace environments.

¹¹ Troubled worksites are facilities where evidence exists of an ongoing history of behavioral factors that remain unresolved at the PC and area levels.

¹² The ASAP was a broad facility review of about 16 yes/no questions regarding core national and area security items. The OIG report titled *Postal Inspection Service Security Controls and Processes - Area Security Assessment Program* (Report Number SA-AR-07-004, dated July 10, 2007) identified that ASAPs were duplicative of security reviews performed by the Postal Inspection Service and the reviews have been discontinued.

¹³ The VOE Vital Few List identifies PC facilities with the largest opportunity for VOE Survey score improvement.

- TAT incident reports and responses.
- Safety talks.
- Numbers of grievances and EEO complaints.
- Numbers of assaults and credible threats.
- HR managers' and staff roles and responsibilities in the workplace violence prevention and response programs.

Although we relied on data obtained from the EEO Complaints Tracking System, Grievance Arbitration Tracking System, Inspection Service Integrated Information System, National Training Database (NTD), payroll database, and the Web-Enabled Enterprise Information System (WebEIS), we did not test the validity of the data and controls over the systems. We believe the computer-generated data was sufficiently reliable to support the opinions and conclusions in this report.

We conducted this performance audit from January through November 2007 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances.¹⁴ Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management officials on August 17, 2007, and included their comments where appropriate.

¹⁴ For example, we reviewed internal controls related to the posting and dissemination of PC zero tolerance statements, FY 2006 workplace violence awareness training records, TAT incident case files, climate indicators used to monitor and evaluate PC workplace environments, TAT meeting frequency and minutes, and performance measures used to evaluate TAT performance.

APPENDIX D. PRIOR AUDIT COVERAGE

The OIG report titled *Postal Inspection Service Security Controls and Processes - Area Security Assessment Program* (Report Number SA-AR-07-004, dated July 10, 2007) indicated that management did not effectively and efficiently use the ASAP to assess Postal Service security and compliance with security policies and procedures. Specifically, management developed and implemented the national standardized ASAP without guidance or approval from the Postal Inspection Service, which has primary responsibility for security at the Postal Service. As a result, Postal Service management used its own personnel to conduct ASAP reviews, the results of which the Postal Inspection Service did not take into account when assessing security operations. Additionally, Postal Service management expended approximately \$144,000 on the ASAP database, however, the information in the database was not reliable. We recommended and management agreed to discontinue the use of the ASAP given that the Postal Inspection Service does not use the results to assess security operations in the Postal Service, and it is similar to security reviews the Postal Inspection Service currently performs.

APPENDIX E. ALBUQUERQUE, DALLAS, AND FORT WORTH PERFORMANCE CLUSTERS' CONDITIONS AND CAUSES RELATED TO AUDIT OBJECTIVES

Objective 1 – Determine if the PCs implemented required controls (policies and procedures) to reduce the potential for violence.				
1. Security Strategy - Ensure appropriate safeguards for employees, customers, and property.				
Condition	PCs may not have ensured that appropriate security safeguards were in place and complied with at many facilities.	X	X	X
	<ul style="list-style-type: none"> PC and area managers did not maintain documentation that showed the actions taken and how the actions corrected the 137 security deficiencies identified in 79 FY 2006 ASAP reviews. For example, the reviews identified that in the Albuquerque and Dallas PCs some exterior doors/access points to facilities were not secured (three deficiencies), and unauthorized access to some Fort Worth facilities was not challenged (three deficiencies). 	X	X	X
Cause	Management did not require installation heads to certify they had corrected deficiencies.	X	X	X
2. Communication of Policy Strategy – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.				
Condition	PCs disseminated FY 2006 current local zero tolerance policies to all PC employees through stand-up talks and new employee orientation classes.	✓	✓	✓
	Some communication improvements are needed.	X	X	X
	<ul style="list-style-type: none"> The zero tolerance policy was not posted in four of the 12 facilities visited. 	✓	X	X
	<ul style="list-style-type: none"> The zero tolerance policy was not current in one of the eight facilities that posted it. 	X	✓	✓
	<ul style="list-style-type: none"> The zero tolerance policy was not complete.¹⁵ 	✓	X	✓
Cause	HR and facility managers believed the current policy was posted.	X	X	X
	HR manager considered the threats and assaults action plan as the local zero tolerance policy.		X	

Note: X indicates the PC was not in compliance, and the cause for non-compliance.
 ✓ indicates the PC was in compliance.
 no symbol indicates not applicable.

¹⁵ The Dallas PC zero tolerance policy did not include procedures for employees to report incidents of violent and inappropriate behavior in the workplace.

2. Communication of Policy Strategy (Continued) – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.				
Condition	Workplace violence awareness training needed for some employees.	X	X	X
	• HR managers ensured most employees (26,110) and TAT core members received the required training.	✓	✓	✓
	• [REDACTED] managers did not ensure all managers, supervisors, and 204b supervisors received the required 8-hour (one time) workplace violence awareness training.	X	X	X
Cause	*Numbers and locations of 204b supervisors not known, making it difficult [REDACTED] to track their training.	X		
	[REDACTED] were not aware of the requirement for the 8-hour training course.	X		X
	[REDACTED] did not periodically review the NTD exception reports to determine the names of the managers and supervisors that did not receive the training.		X	
Condition	TATs did not fully implement violence prevention strategies to ensure incidents of violent and inappropriate behavior were fully addressed in accordance with the TAT Guide.	X	X	X
	• 14 incidents reported to two TATs in FY 2006 were not properly addressed.		X	X
	➢ 14 did not receive proper case management (including documenting the assessment of the risk level), ¹⁶ and were not monitored and tracked to ensure resolution.		X	X
	➢ 14 had insufficient (or no) documentation which prevented us from determining how they were addressed and resolved.		X	X
	➢ Nine had no documented risk abatement plans (five did).		X	X
	➢ 14 had insufficient (or no) documentation which prevented us from determining if they were immediately and firmly responded to.		X	X
	• Incidents reported to one TAT in FY 2006 were not documented and may not have been addressed (no incident case files existed). ¹⁷	X		
	• Incident tracking logs not properly maintained to show when the incidents were reported and resolved.	X	X	X
Cause	[REDACTED] did not fully understand the importance of TAT responsibilities.		X	
	• [REDACTED] believed that, despite findings on the seven incidents, the TAT handled incidents appropriately.		X	
	• [REDACTED] believed maintaining follow-up emails on the computer was sufficient [REDACTED].		X	
	Significant management turnover. ¹⁸	X		
	[REDACTED] believed cases were not properly managed and the incident log was not maintained because the WIA position was vacant [REDACTED]. ¹⁹			X

* This is a headquarters issue we will address in a capping report.

¹⁶ The TAT Guide defines the priority risk levels as priority 1 - extreme risk; priority 2 - high risk; priority 3 - low or moderate risk; and priority 4 - no risk.

¹⁷ For example, in September 2003, the [REDACTED] Manager issued a memorandum to all Executive and Administrative Schedule employees expressing the Inspection Service's concern that the PC was failing to meet notification requirements for alleged incidents of violence and threats. The memorandum emphasized the importance of notifying the Inspection Service when incidents occur.

¹⁸ During FY 2006, the [REDACTED] appointed new district, senior plant, HR and labor relations managers, and a new [REDACTED] Postmaster.

¹⁹ [REDACTED].

3. Environment and Culture Strategy – Create a work setting and maintain an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.				
Condition	██████████ took positive steps toward creating an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.	✓	✓	✓
	<ul style="list-style-type: none"> ██████████ used VOE Survey results and focus groups, grievances, EEO complaints, climate assessments, and Flash Reports to identify and follow up on events that could escalate the potential for violence. 	✓	✓	✓
	Some improvements are needed.	X	X	X
	<ul style="list-style-type: none"> ██████████ did not maintain documentation on how they used other climate indicators to monitor and evaluate the workplace environment (including the frequency) except for the VOE Survey results. 	X	X	X
Cause	██████████ considered evaluations of the VOE Survey results sufficient documentation of workplace climate indicators.	X	X	X
Condition	TATs did not always consistently conduct quarterly meetings, properly prepare meeting minutes, and disseminate minutes to required TAT members.	X	X	✓
	TATs had the requisite number and type of team members required by the TAT Guide.	✓	✓	✓
Cause	██████████ was not knowledgeable of TAT responsibilities and how the team should operate.	X		
	██████████ believed informal meetings were sufficient to keep potential violence in the workplace incidents from escalating.		X	
Condition	Measures to gauge TATs' success were not documented and may not have been adequate.		X	X
	<ul style="list-style-type: none"> TATs informally discussed their performance during team meetings. 			✓
	<ul style="list-style-type: none"> TATs informally used TAT discussions, climate assessments, VOE team office visits,²⁰ and VOE Survey scores. 		✓	
	<ul style="list-style-type: none"> TATs did not document informal measurements. 		X	X
	TATs did not discuss or establish measures to evaluate the team's performance.	X		
Cause	██████████ was not aware of the requirement to measure team's performance.	X		
	██████████ believed the informal measures accomplished the intended purpose.		X	X

²⁰ The PC created a VOE team that would visit and discuss workplace climates with facility employees.

Objective 2 – Determine the adequacy of oversight of the workplace violence prevention program at the area and PC levels.				
Oversight of the Workplace Violence Prevention and Response Program				
Condition	██████████ managers did not provide adequate oversight of the violence prevention and response programs.	X	X	X
	• ██████████ did not ensure TATs implemented many required policies and procedures to reduce the potential for violence related to security, communication of policy, and the environment and culture.	X	X	X
	• ██████████ did not ensure that appropriate TAT processes were followed and performance measures were documented.	X	X	X
	• ██████████ provided assistance to the PCs when requested for incidents that could not be resolved at the PC level.	✓	✓	✓
Cause	██████████ relied on ██████████ to ensure compliance with the TAT Guide requirements.	X	X	X
	██████████ relied on the ██████████ to ensure compliance with the TAT Guide.	X	X	X

**APPENDIX F. ALBUQUERQUE PERFORMANCE CLUSTER
FISCAL YEAR 2006 VOICE OF THE EMPLOYEE SURVEY RESULTS
FOR QUESTIONS RELATED TO THE WORKPLACE ENVIRONMENT**

Redacted

* [REDACTED]

[REDACTED]

**APPENDIX G. DALLAS PERFORMANCE CLUSTER FISCAL YEAR
2006 VOICE OF THE EMPLOYEE SURVEY RESULTS FOR QUESTIONS
RELATED TO THE WORKPLACE ENVIRONMENT**

Redacted

* [REDACTED]

[REDACTED]

**APPENDIX H. FORT WORTH PERFORMANCE CLUSTER FISCAL
YEAR 2006 VOICE OF THE EMPLOYEE SURVEY RESULTS FOR
QUESTIONS RELATED TO THE WORKPLACE ENVIRONMENT**

Redacted

* [REDACTED]
[REDACTED]

APPENDIX I. MANAGEMENT'S COMMENTS

ELLIS A. BURGOYNE
VICE PRESIDENT, SOUTHWEST AREA OPERATIONS



October 25, 2007

Kim Stroud
Director, Audit Reporting
1735 North Lynn Street
Arlington, Virginia 22209-2020

SUBJECT: Transmittal of Draft Audit Report – Postal Service's Violence Prevention and Response Programs in Three Southwest Area Performance Clusters (Report Number HM-AR-08-DRAFT)

This is in response to the OIG Audit report dated September 26, 2007 and recommendations concerning the Workplace Violence Prevention Program. This response addresses the purpose of the audit as stated in the October 5, 2006 Engagement Announcement, which was to "determine if selected locations have implemented required controls (policies and procedures) to reduce the potential for violence."

It also provides the Southwest Area's actions to address each recommendation. The Southwest Area is committed to providing a safe and secure work environment for all its employees. We agree that this audit has provided us areas of opportunity to improve our processes and follow up to make sure we are providing such an environment.

Following are our responses to the recommendations.

Communication of Policy Strategy:

Recommendation [1]:

We recommend the Vice President, Southwest Area Operations:

Direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to implement an internal control to ensure their current zero tolerance policy is properly posted in all facilities, at least annually. For example, facility managers could provide written annual certifications to the performance cluster threat assessment teams.

Response: We have directed the Districts to implement a control process to ensure that the zero tolerance policy is properly posted in all facilities annually. They will certify to the Area HR Office that this has been done.

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Recommendation [2]:

Direct the Dallas Performance Cluster managers to update their zero tolerance policy to include the lead plant manager's signature.

Response: Although the sample letters in the PUB 108 show a signature line for Lead Plant Managers, the compliance items shown on page 31 of Publication 108 do not include a requirement that the Lead Plant Manager be included on the policy statement. However, in spite of this not being a requirement, we will direct Dallas to update the communication with both signatures.

Workplace Violence Awareness Training:

Recommendation [3]:

We recommend the Vice President, Southwest Area Operations:

Notify the Albuquerque, Dallas, and Fort Worth Performance Cluster managers that workplace violence awareness training is a fiscal year mandatory requirement, and it is their responsibility to ensure that training occurs, preferably during non-peak operational periods.

Response: We have notified the Districts of their responsibility to ensure that the mandatory training occurs and they track and document that it has been done.

Recommendation [4]:

Direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to determine which managers, supervisors, and 204b supervisors have not received the 8-hour (one-time) workplace violence awareness training, and provide the training as soon as possible.

Response: We have notified the Districts and they will review the records and provide the training to all current supervisors and 204Bs that have not had the one time training and conduct the training during non-peak operational periods.

Recommendation [5]:

Instruct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to:

- Remind Human Resources managers of their responsibility to conduct periodic reviews (at least quarterly) to determine if management has met the mandatory workplace violence awareness training requirements for all employees (including 204b supervisors).
- Implement a control to ensure Human Resources managers conduct periodic reviews to determine which managers and supervisors did not receive the violence awareness training.

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Response: We have notified the Districts Managers to follow up and instruct Human Resources to set up periodic reviews quarterly to verify that mandatory training has been conducted. They will set up the control and provide written certification to the District Manager on a quarterly basis.

Strategies to Enforce Postal Service Policy Not Fully Implemented:

Recommendation [6]:

Remind the Albuquerque, Dallas, and Fort Worth Performance Cluster managers of their responsibility to ensure that threat assessment teams comply with the Threat Assessment Team Guide when responding to and resolving incidents of violent and inappropriate behavior.

Recommendation [7]:

Direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to implement a control to ensure threat assessment teams comply with the Threat Assessment Team Guide when responding to and assessing reports of potentially violent situations and inappropriate behavior.

Recommendation [8]:

Direct the Albuquerque, Dallas, and Fort Worth threat assessment teams to review the incidents that had insufficient or no supporting documentation and determine if they were resolved in accordance with the Threat Assessment Team Guide.

Response to 6, 7 & 8: The Districts have been directed to comply with the provisions, policies and processes as written in the Threat Assessment Team Guide. The Human Resources Managers for the Albuquerque, Dallas and Fort Worth Districts have committed to ensuring that their Threat Assessment Teams follow the procedures outlined in Publication 108, including the compliance items. They will document all of their efforts to demonstrate compliance.

Environment and Culture Strategy – Create a work setting and maintain an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.

Monitoring and Evaluating Workplace Climate Indicators

Recommendation [9]:

We recommend the Vice President, Southwest Area Operations:

Direct the Albuquerque, Dallas, and Fort Worth Performance Cluster managers to ensure the threat assessment teams document their evaluations of climate indicators to identify trends and hotspots.

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Response: We have directed the Districts to ensure they document their evaluations of climate indicators, identify trends and hotspots and follow up as appropriate.

Team Process and Performance Measures Could Be Improved

Recommendation [10]:

We recommend the Vice President, Southwest Area Operations, direct the [REDACTED] Performance Cluster managers to:
Remind the Human Resources managers of their responsibility to conduct meetings, and properly document and disseminate the minutes to the appropriate threat assessment team members.

Response: We have reminded the Districts to conduct the appropriate number of meetings and properly document them in the EAP/Workplace Environment Improvement (WEI) Office web-based TAT Membership & Meeting Tool. This tool was designed to ensure management conducts, documents, and disseminates PC TAT meetings in accordance with the *TAT Guide*.

Threat Assessment Team Performance Measures

Recommendation [11 & 12]:

We recommend the Vice President, Southwest Area Operations, instruct the [REDACTED] Performance Cluster managers to:
Direct the threat assessment team to implement performance measures to gauge whether the team's efforts and processes to prevent violent incidents in the workplace are successful or need improvement.

Implement controls to ensure threat assessment teams document the processes used to measure the teams' performance, as required by the Threat Assessment Team Guide, and ensure the measurements used are adequate for determining success and identifying areas for improvement.

Response: We have directed the Districts to document the follow up and review their actions and the results achieved and act accordingly to ensure improvement in the work place. We have also directed them to put controls in place to measure the performance as called for in the guide.

Oversight of the Workplace Violence Prevention Program

Recommendation [13 & 14]:

We recommend the Vice President, Southwest Area Operations:
Implement an internal control to ensure Southwest Area Performance Cluster

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managers provide adequate oversight of their threat assessment teams to improve the effectiveness of the violence prevention and response programs. For example, performance cluster managers could provide the Area Vice President with an annual certification that the teams are conducting business in accordance with the Threat Assessment Team Guide and related Postal Service policies.

Determine if the findings in this report exist in the remaining Southwest Area Performance Clusters - Arkansas, Houston, Louisiana, Oklahoma, and Rio Grande - and, where necessary, take action to ensure management implements adequate controls.

Response: We will establish an Area control point to provide oversight and periodic reviews to ensure that the TAT guide is being complied with in all appropriate situations. The Districts have been instructed to provide the AVP with annual certifications that the teams are conducting business in accordance with the TAT guide.

We will implement this recommendation for the entire Southwest Area as well as have the un-audited Districts review their activities and ensure that they are complying with the policies and procedures of the guide. Each of the un-audited Districts will provide written certification that they are following the requirements of the TAT guide.

This concludes our responses. The Southwest Area appreciates the opportunity for input into this draft report. If you need anything further, please contact the Southwest Area Manager, Human Resources.


Ellis A. Burgoyne
Area Vice- President
Southwest Area