



November 13, 2007

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VICE PRESIDENT, PACIFIC AREA OPERATIONS

SUBJECT: Audit Report – The Postal Service’s Violence Prevention and Response Programs in Two Pacific Area Performance Clusters (Report Number HM-AR-08-004)

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 two Pacific Area Performance Clusters (PC) (Project Number 06YG044HM002). The Pacific 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 Sacramento and San Diego 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 fourth 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 the 15 PCs, management’s actions to correct the conditions, and issues identified with nationwide impact.

We concluded the Sacramento and San Diego 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, Pacific 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 Pacific Area, its PCs, and its TATs improve the effectiveness of the violence prevention and response program. Implementation of these recommendations will also improve the safety and security of

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 all 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.

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 recommendations 1, 3, 6 through 8, and 10 through 14, and the actions taken or planned should correct the issues identified. Management partially agreed to implement recommendations 5 and 9, did not agree to implement recommendation 4, and did not address recommendation 2. In regards to recommendations 2, 4, 5, and 9 we view management's comments as unresponsive and plan to pursue these recommendations through the formal audit resolution process. 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 (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 the 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 Sacramento and San Diego 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 two PCs did not consistently ensure that facilities had appropriate security safeguards in place and that employees complied with them. Our May 2007 report disclosed management needed to make improvements to protect employees, customers, the mail, and critical assets.³

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 fiscal year (FY) 2006 VOE Survey results for the Sacramento and San Diego PCs indicate that numerous employees were concerned that unauthorized individuals could gain access to facilities in their PCs. (See Appendices F and G for additional details regarding VOE Survey responses.)

The Pacific Area took corrective actions prior to and after issuance of our May 2007 report. We are not making 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 Sacramento and San Diego 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 its procedures for posting their zero tolerance policy, which sometimes was not posted at all, or was not signed by the current lead plant manager at some of the facilities we visited.

³ *Postal Service Security Controls and Processes for the Pacific Area* (Report Number SA-AR-07-003, dated May 9, 2007).

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. In addition, when both PC managers sign the zero tolerance policy, it reaffirms to all employees the managers' commitment to a violence free workplace.

Corrective Action

As a result of this audit, the Sacramento PC updated their zero tolerance policy in August 2007 to include the current lead plant manager's signature.

Recommendation

We recommend the Vice President, Pacific Area Operations:

1. Direct the Sacramento and San Diego 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.

Workplace Violence Awareness Training Needed for Some Employees

The Sacramento and San Diego PC and Human Resources (HR) managers ensured most employees and TAT core members⁴ received the required training. However, the HR managers did not ensure all managers, supervisors, and 204b supervisors⁵ 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. In addition, TAT members that are not adequately trained may not be effective in establishing or administering a violence prevention and response program to reduce the risk of violence in the workplace.

Corrective Actions

Since December 2006, the Sacramento PC has trained 579 of their 656 managers, supervisors, and 204b supervisors in the required 8-hour workplace environment training.

The Postal Service Headquarters Employee Assistance Program (EAP)/Workplace Environment Improvement Office established a web-based TAT Membership and Meeting Tool to ensure TAT core members receive the required training in accordance

⁴ TAT core members include the HR manager or designee, labor relations manager, medical director or occupational health nurse administrator (OHNA), district manager or designee, and lead plant manager or designee.

⁵ A 204b supervisor is a bargaining employee detailed to an acting supervisor position.

with the TAT Guide. Effective March 2007, each PC is required to timely update the information for their TAT core member.

Recommendations

We recommend the Vice President, Pacific Area Operations:

2. Notify the Sacramento and San Diego 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. Direct the San Diego 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.
4. Direct the Sacramento Performance Cluster managers to ensure the remaining 77 managers, supervisors, and 204b supervisors receive the 8-hour (one-time) workplace violence awareness training as soon as possible.
5. Instruct the Sacramento and San Diego District managers to:
 - Remind Human Resources managers of their responsibility to conduct periodic reviews (at least quarterly)⁶ to determine if management has met the mandatory workplace violence awareness training requirements for all employees (including 204b supervisors) and threat assessment team members.
 - 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 Sacramento and San Diego 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 25⁷ incidents reported to the two TATs in FY 2006 and determined that 20 of them were not properly addressed in accordance with the TAT Guide.

Opportunities to prevent a violent incident from occurring diminish when management does not fully implement violence prevention strategies to properly address potentially

⁶ Quarterly reviews would provide sufficient time to schedule employees for training within the fiscal year it is required.

⁷ We reviewed seven Sacramento and 18 San Diego PC incidents.

violent incidents. In addition, management needs to appropriately and immediately respond to potentially violent incidents. For example, VOE Survey quarterly reports for the two 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, Pacific Area Operations:

6. Remind the Sacramento and San Diego 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.
7. Direct the Sacramento and San Diego 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 San Diego threat assessment team to review the incidents that had insufficient 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 two PC HR managers took positive steps toward creating an atmosphere perceived to be fair and free from unlawful and inappropriate behavior. For example, they disseminated zero tolerance policies to all employees and 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, EAP referrals, and Flash Reports⁸ 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

⁸ A Flash Report is an operations report for a specific facility that shows workhour usage, productivity, sick leave, and overtime rates for that facility.

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 19 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.

Recommendation

We recommend the Vice President, Pacific Area Operations:

9. Direct the Sacramento and San Diego Performance Cluster managers to ensure the threat assessment teams document their evaluations of climate indicators to identify trends and potential hotspots.

Team Process and Performance Measures Could be Improved

TAT Members, Meetings, and Minutes

The Sacramento TAT had the requisite number and type of team members, but the San Diego team did not. In addition, both TATs did not consistently conduct quarterly⁹ meetings, properly prepare meeting minutes, and disseminate minutes to the required TAT members, per the TAT Guide.

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 TAT Membership and Meeting Tool should help to ensure that 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.

Recommendations

We recommend the Vice President, Pacific Area Operations, direct the Sacramento and San Diego 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.

⁹ The Postal Service modified the TAT Guide in March 2007 to require meetings twice a quarter.

We also recommend the Vice President, Pacific Area Operations, direct the San Diego Performance Cluster managers to:

11. Ensure the threat assessment team has the requisite number and type of threat assessment team members.

TAT Performance Measures

The San Diego TAT used surveys to measure the teams' performance as suggested by the TAT Guide, and maintained documentation. The Sacramento HR manager stated the TAT implemented informal performance measures such as verbal feedback from employees to gauge whether the TAT was successful or needed to change its processes. However, the HR manager did not document the measures and the measures may not be adequate.

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

Recommendation

We recommend the Vice President, Pacific Area Operations, direct the Sacramento Performance Cluster managers to:

12. Implement controls to ensure the threat assessment team documents the processes used to measure the team's 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 indicates the Sacramento and San Diego PC and Pacific Area HR managers did not provide adequate oversight of the violence prevention and response programs. The PC managers did not ensure the two 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 that TATs followed appropriate processes and the Sacramento PC and HR managers did not ensure the TAT documented performance measures.

In addition, the former Pacific Area HR manager did not ensure the two PCs fully implemented the workplace violence prevention program even though the OIG recommended improvements to the Sacramento program in November 2000.¹⁰

¹⁰ *Review of the Violence Prevention and Response Programs in the Sacramento District* (Report Number LB-AR-01-004, dated November 28, 2000).

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 Sacramento and San Diego 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, Pacific Area Operations:

13. Implement an internal control to ensure Pacific 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 Pacific Area Performance Clusters – Bay-Valley, Honolulu, Los Angeles, San Francisco, Santa Ana, and Sierra Coastal – and, where necessary, take action to ensure management implements adequate controls.

Management's Comments

Management did not clearly state whether they agreed or disagreed with the report findings. However, management agreed to implement recommendations 1, 3, 6 through 8, and 10 through 14, and provided descriptions of actions taken and planned.

Management partially agreed to implement recommendations 5 and 9, did not agree to implement recommendation 4, and did not address recommendation 2. Specifically, management stated that recommendation 5 repeated recommendations 2, 3, and 4, and that the TAT Membership and Meeting Tool will confirm TAT members' training. For recommendation 9, management stated the San Diego PC would document their climate indicator evaluations, but did not address the Sacramento PC's documentation efforts. For recommendation 4, management stated they provided training reports and sign-in rosters to the OIG on August 10, 2007, as support for the 77 managers and supervisors receiving the one-time training as required.

Management agreed that any improvement in the workplace environment can improve the Postal Service's reputation (goodwill), and stated they had no basis for disagreement with the non-monetary impact.

Other management comments included that our statement in Appendix E that the HR Managers did not fully understand the importance of TAT responsibilities was not supported by audit findings. Management further stated that the report cited deficiencies in areas that were not required by the TAT Guide, such as the zero tolerance postings and how and when managers evaluate and monitor climate indicators. Management stated that they considered these to be contradictions and inaccuracies, and as such the report should not be disclosed in response to Freedom of Information Act (FOIA) requests. Management's comments, in their entirety, are included in Appendix H.

Evaluation of Management's Comments

Management's comments are responsive to recommendations 1, 3, 6 through 8, and 10 through 14, and the actions taken or planned should correct the issues identified. Their comments are partially responsive to recommendations 5 and 9, and are not responsive to recommendations 2 and 4. Finally, management's comments regarding the contradictions and inaccuracies in the report are without merit.

We agree that management's use of the TAT Membership and Meeting Tool will help to ensure that TAT core members receive the required training. We have revised the report to add management's use of this tool as a corrective action, since it was effective before the report was issued. We disagree with management that recommendation 5 repeats recommendations 2, 3, and 4. Recommendation 5 addresses the need to implement a control to ensure that the deficiencies specifically addressed by recommendations 2, 3, and 4 do not reoccur.

Management's agreement to implement recommendation 9 in the San Diego PC, but not the Sacramento PC, indicates there may have been a misunderstanding regarding the intent of the recommendation. Specifically, the recommendation was for the vice president to direct the PC managers to ensure the TATs document the evaluations. It is not clear why one PC would be required to document their evaluations of climate indicators, and the other would not.

The absence of management's comments for recommendation 2 may have been an oversight because the area vice president agreed in an August 2007 meeting that the districts needed to provide better oversight of the violence prevention program.

We disagree with management's response to recommendation 4, that the training reports and sign-in rosters provided to the OIG support the 77 managers and supervisors received the one-time training. The referenced documents supported that 579 of Sacramento's 656 managers, supervisors, and 204b supervisors received the required 8-hour workplace environment training. In fact, the area's correspondence to

us specifically states that 579 were trained. This was shown in the report as corrective action. No additional documentation was provided to show that the remaining 77 managers and supervisors received the training.

We do not agree with management that our statement that HR managers did not fully understand the importance of TAT responsibilities was not supported by audit findings. Appendix E lists the deficiencies we found related to the 25 incidents and the HR managers' response that despite the deficiencies they believed the TATs responded appropriately. In our opinion, such a response indicates the HR managers did not fully understand the importance of the TAT Guide requirements.

We also do not agree with management that posting the zero tolerance policy was not required by the TAT Guide. The guide requires that employees be educated on their local TAT systems and processes to support zero tolerance. The guide lists a number of methods that can be used, including wall postings. According to Sacramento and San Diego District management, posting the zero tolerance policy in all facilities was a requirement.

Finally, we do not agree with management that the TAT Guide did not require that evaluating and monitoring climate indicators be documented. The guide does not specifically state that this must be documented, however, it does state that the TAT is responsible for evaluating the climate indicators and that TAT responsibilities including incident work site monitoring must be discussed at quarterly meetings. The guide further requires that quarterly meetings be documented (minutes). Management's comments, in their entirety, are included in Appendix H.

We plan to pursue the resolution of recommendations 2, 4, 5, and 9 through the formal audit resolution process. The OIG considers recommendations 1 through 5, 7 through 9, and 11 through 14 significant; therefore, they require 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

Darrell E. Benjamin, Jr.
Deputy Assistant Inspector General
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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
FSS	Facility Security Surveys
FY	Fiscal Year
HR	Human Resources
NTD	National Training Database
OHNA	Occupational Health Nurse Administrator
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

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, fingerprinting, 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.*

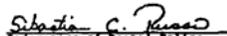
We openly acknowledge that in some places or units there is an unacceptable level of stress in the workplace; that there is no excuse for and will be no tolerance of violence or any threats of violence by anyone at any level of the Postal Service; and that there is no excuse for and will be no tolerance 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 objectives of this audit were 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 Sacramento and San Diego PCs implemented required controls (policies and procedures) to reduce the potential for violence and (2) the level of oversight of the workplace violence prevention program at the area and PC levels was adequate.¹¹

To evaluate the workplace violence prevention and response program in the Pacific Area, we judgmentally selected the Sacramento and San Diego PCs from the eight PCs in the Pacific Area. We selected these PCs based on an analysis of seven workplace environment climate indicators for FYs 2004 through 2006.¹² 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 list¹³ and whether the OIG conducted prior workplace environment audits in the PC. Finally, we included PCs where the OIG Inspection Service and Facilities Directorate was auditing the Postal Service's security controls and processes to determine if the PCs complied with the key strategy related to security.

We interviewed the PCs' HR, Labor Relations, and Training managers; the Workplace Improvement Analysts; and the area's HR manager 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 meeting minutes and reports used to monitor and enforce policies and procedures to reduce violence in the workplace. In addition, we reviewed the TAT Guide, ASM, 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.
- VOE Vital Few List.¹⁴
- Attendance records for required workplace violence awareness training.
- TAT incident reports and responses.
- Newsletter articles, advertisements and stand-up talks related to the zero tolerance policies.

¹¹ We will address oversight at the headquarters level in a separate report.

¹² 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.

¹³ Troubled worksites are facilities where evidence exists of an ongoing history of behavioral factors that remain unresolved at the PC and area levels.

¹⁴ The VOE Vital Few List identifies PC facilities with the largest opportunity for VOE Survey score improvement.

- 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.
- Area Security Assessment Program (ASAP)¹⁵ review results.

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 December 2006 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.¹⁶ 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 9, 2007, and included their comments where appropriate.

¹⁵ 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.

¹⁶ 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, *Review of the Violence Prevention and Response Programs in the Sacramento District* (Report Number LB-AR-01-004, dated November 28, 2000), stated that required controls were not fully implemented to reduce the potential for violence in the Sacramento District. The report also stated the district's ability to respond to crisis situations could be improved. Although the district generally complied with the *TAT Guide* when reacting to incidents of violence, it did not comply with other violence prevention requirements. Specifically, the district did not monitor and evaluate climate indicators, provide the required 2-day orientation training for all TAT members, engage in case management for all threats that occurred within the district, measure TAT team performance, mandate violence awareness training and develop an action plan for district management to deal with acts of workplace violence. We recommended the Vice President, Pacific Area, direct the Sacramento District Manager to implement controls to improve the effectiveness of the district's violence prevention program and strengthen the district's ability to respond in a crisis. Management did not concur with the recommendations. However, we believed the district's planned or implemented actions were responsive.

The OIG report titled, *Postal Service Security Controls and Processes for the Pacific Area* (Report Number SA-AR-07-003, dated May 9, 2007), concluded the Postal Service and the Postal Inspection Service have opportunities to improve security controls and processes to more effectively and efficiently protect employees, customers, the mail, and critical assets. Specifically, responsible security personnel did not always conduct facility security surveys (FSS)¹⁷ accurately and annually as required. In addition, security personnel did not always sufficiently address and resolve FSS deficiencies, 66 percent of security personnel did not receive security control officer training, and management did not efficiently assess security operations to identify areas for improvement. Management generally agreed with the two recommendations.

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

¹⁷ The FSS is an in-depth checklist of 273 yes/no questions covering various areas of security. Postal Service and Inspection Service security officers in the field complete the survey annually.

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. SACRAMENTO AND SAN DIEGO 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 did not consistently ensure appropriate security safeguards were in place and complied with at many facilities.	X	X
	• Security personnel did not establish internal or management controls requiring FSS approval to ensure accuracy and timeliness.	X	X
	• Security personnel did not always conduct FSSs accurately and annually.	X	X
	• Security personnel did not always sufficiently address and resolve FSS deficiencies.	X	X
	• 66 percent of security personnel did not receive security control officer training.	X	X
	• Management did not effectively assess security operations to identify areas for improvement.	X	X
Cause	Management did not establish consolidated standard operating procedures and guidance.	X	X
	Management did not implement appropriate internal and management controls.	X	X
	Management did not require installation heads to certify they had corrected deficiencies.	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
	• The zero tolerance policy was not posted at four of the eight facilities visited.	X	X
	• The zero tolerance policy was not signed by the lead plant manager.	X	
Cause	██████ did not know why policy was not posted.	X	X
	██████ did not know why the policy was not posted.		X
	██████ signature was not required.	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.

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
	• HR managers ensured most employees (23,011) and TAT core members received the required training.	✓	✓
	• PC and HR managers did not ensure all managers, supervisors, and 204b supervisors received the required 8-hour (one time) workplace violence awareness training.	X	X
Cause	*The NTD does not identify 204b supervisors separate from their bargaining employee identification.		X
	██████ not aware of the 8-hour workplace violence awareness training requirement for supervisors, managers, and 204b supervisors.	X	
	██████ managers relied on ██████ managers to ensure compliance with TAT training requirements.	X	X
	██████ the training for managers and supervisors was completed in Associate Supervisor Program (for new supervisors), and Postmaster meeting training (for current managers/supervisors).		X
	██████ the OHNA was a required TAT core member.		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 <i>TAT Guide</i> .	X	X
	• 25 incidents reported to TATs in FY 2006 were immediately and firmly responded to (when reported).	✓	✓
	➤ 20 incidents were not fully addressed (five were).	X	X
	○ Two did not receive proper case management (including documenting the assessment of the risk level) ¹⁸ and were not monitored and tracked to ensure resolution, while 18 received case management and were monitored.	X	X
	○ 16 had insufficient (or no) documentation which prevented us from determining how they were addressed and resolved (four did).	✓	X
	○ 11 had no documented risk abatement plans (nine did).	X	X
	• Incident tracking logs not maintained to show when the 25 incidents were reported and resolved.	X	X
Cause	██████ did not fully understand the importance of TAT responsibilities.	X	X
	• ██████ believed that despite findings on 25 incidents, TATs handled incidents appropriately.	X	X

* These are headquarters issues we will address in a capping report.

¹⁸ 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.

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	HR managers took positive steps toward creating an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.	✓	✓
	• HR managers used VOE Survey results, grievances, EEO complaints, and EAP referrals as climate indicators to identify and follow up on events that could escalate the potential for violence	✓	✓
	• HR managers assisted facility managers in developing action plans for improving low VOE Survey scores. Some improvements are needed.	✓	✓
	• ████████ did not maintain documentation on how they used other climate indicators to monitor and evaluate the workplace environment (including the frequency) except for VOE Survey results.	X	X
Cause	██████ considered evaluations of the VOE Survey results sufficient documentation of workplace climate indicators.	X	X
Condition	TATs did not 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 <i>TAT Guide</i> .	✓	X
Cause	██████ was not knowledgeable of TAT responsibilities and how team should operate.	X	X
	• ████████ believed the TAT informal meetings held periodically throughout the year were sufficient.	X	X
	• ████████ did not prepare meeting minutes due to the confidentiality of cases.	X	
	• ████████ did not know the OHNA was a required TAT core member.		X
Condition	Measures to gauge TATs' success were not documented and may not have been adequate.	X	✓
	• TAT informally obtained verbal feedback from employees and used VOE Surveys and Flash Reports.	✓	
	• TAT used surveys as identified in the <i>TAT Guide</i> and maintained documentation.		✓
	• TAT did not document informal measurements.	X	✓
Cause	TAT believed the informal measures accomplished the intended purpose.	X	

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	PC and area HR managers did not provide adequate oversight of the violence prevention and response programs.	X	X
	• [REDACTED] 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
	• [REDACTED] did not ensure that appropriate TAT processes were followed.	X	X
	• [REDACTED] did not ensure that performance measures were documented.	X	✓
	• [REDACTED] did not ensure the two PCs fully implemented the program even though the OIG recommended improvements to the Sacramento program in November 2000.	X	X
Cause	[REDACTED] relied on [REDACTED] to ensure compliance with the <i>TAT Guide</i> requirements.	X	X
	[REDACTED] relied on the [REDACTED] to ensure compliance with the TAT requirements.	X	X

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

Redacted

* [REDACTED]

[REDACTED]

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

Redacted

* [REDACTED]

[REDACTED]

APPENDIX H. MANAGEMENT'S COMMENTS

MICHAEL J. DALEY
VICE PRESIDENT, PACIFIC AREA OPERATIONS



October 15, 2007

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

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

This is in response to the OIG Audit report dated October 1, 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 Pacific Area's actions to address each recommendation. The following are our responses to the recommendations. Included in this management response are noted areas where Headquarters, who partnered in our response, disagreed with findings. We have no basis for disagreement with the non-monetary impact of the recommendations. We agree that any improvement in the workplace environment can improve the Postal Service's reputation (goodwill).

Communication of Policy Strategy:

Recommendation [1]:

We recommend the Vice President, Pacific Area Operations:

Direct the Sacramento and San Diego 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: The newly revised publication 108 states in the compliance chapter on page 31 that 'TAT policy information is to be issued, at a minimum, annually. This information includes the zero tolerance policy statement and reporting procedures for all employees'. The December 2002 edition of Publication 108 states the same policy. This requirement was included to ensure policies are communicated to employees. It is the communication, not necessarily the posting that ensures that employees are informed of the agencies zero tolerance policies. It is clear from the audit that efforts to ensure such communications were documented and met the requirements of the Headquarters policies and procedures for the Workplace Violence Prevention Program.

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The Pacific Area went beyond the requirements with the following action in response to recommendation 1:

Sacramento – On August 13, 2007 Human Resources sent out an email instructing all facility managers to utilize the UCSS Required Communications System to certify no later than COB on August 17, 2007 that they have conducted an Employee Communication Briefing to EAS and craft employees of the Zero Tolerance Policy, post it and provide the location of the posting in their facility. Additionally, the cluster will include the validation of the certification through office visits, during Building inspections and PEG.

San Diego – Within the first month of Fiscal Year 2008, Threat Assessment Team (TAT) will coordinate with the District Manager that the Zero Tolerance Policy will again be posted in a prominent location at all installations. Written certification of compliance will be required. This process will be repeated each fiscal year.

Workplace Violence Awareness Training:

Recommendation [2, 3, & 4]:

We recommend the Vice President, Pacific Area:

Notify the Sacramento and San Diego 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.

Direct the San Diego 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.

Direct the Sacramento Performance Cluster managers to ensure the remaining 77 managers, supervisors, and 204b supervisors receive the 8-hour (one-time) workplace violence awareness training as soon as possible.

Response: The 1 hour workplace violence awareness training courses #18201-21 and #18201-24 were a FY 2006 training requirement. According to Appendix E of the report, the HR managers had ensured that most employees (23,011) and TAT core members received the required training. The training course titled "Workplace Violence Awareness Training", course number 21558-00 is required for every manager and supervisor. Publication 108 reflects the original step with the training, where 64,000 or more supervisors were trained, and then the Associate Supervisor Program was tasked with providing the WVA training to new supervisors.

In addition, for recommendation 2 the Pacific Area responds: San Diego – The TAT will identify those few postmasters, managers, and supervisors that have not had the Workplace Violence Prevention Training and schedule classes accordingly.

In addition, for recommendation 4 the Pacific Area responds: Sacramento-The OIG requested the total number of managers and supervisors during FY2006 who completed the one-time TAT workplace violence awareness training. On August 10, 2007 training reports and sign in rosters for those classes as documentation, were provided to the OIG to substantiate our abatement of this item.

Recommendation [5]:

- Instruct the Sacramento and San Diego District managers to:
- Remind Human Resources managers of their responsibility to conduct

periodic reviews (at least quarterly) 6 to determine if management has met the mandatory workplace violence awareness training requirements for all employees (including 204b supervisors) and threat assessment team members.

- Implement a control to ensure Human Resources managers conduct periodic reviews to determine which managers and supervisors did not receive the violence awareness training.

This recommendation is redundant to the recommendation listed in 2,3, and 4. Directing the Human Resources to provide this training as soon as possible will include use of organizational training databases and summaries. Further, the threat assessment team members are required to take orientation training course #22203-00 and there is already a tool to use for review. The EAP/Workplace Environment Improvement (WEI) Office web-based TAT Membership & Meeting Tool provides for confirmation of team members' training.

Strategies to Enforce Postal Service Policy Not Fully Implemented:

Recommendation [6]:

Remind the Sacramento and San Diego 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.

Recommendation [7]:

Direct the Sacramento and San Diego 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 San Diego threat assessment team to review the incidents that had insufficient supporting documentation and determine if they were resolved in accordance with the Threat Assessment Team Guide.

Response: It is difficult to ascertain from the audit and Appendix E what requirements were not met which equate to improper case management. The lack of documentation does not automatically equate to the lack of action or a failing to meet a requirement. It is unclear as to how the audit is measuring whether the TAT team "immediately and firmly" responded. It is also uncertain as to the scope of the deficiencies and the real impact to the process. However, the Pacific Area has taken the following action for recommendations 6, 7 and 8:

Sacramento- As a result of the OIG audit the TAT team is reviewing Publication 108 March 2007 to ensure we are following all measures. As a part of our commitment to the Workplace Violence Prevention Program we are going to implement new forms in addition to what we currently use. This will improve the documentation of our activities we currently perform on a regular basis in response to each incident.

San Diego-Through various methods (training; direct e-mailing and presentations) will inform Postmaster and managers of their roles and responsibilities; as well as the zero tolerance policy.

Sacramento- The TAT currently takes the appropriate action steps when addressing an incident. The MHR, MLR and WIA discuss the situation and determine whether a TAT meeting needs to be called. The Team is then called. We arrange for the postal inspector and onsite manager to participate in the TAT meeting. We ask the local manager to collect information, such as witness statements. The TAT gathers all relevant information from all team members in order to make an informed assessment. After reviewing all risk factors we assign a Priority risk rating to the case. We then list the action steps that will take place and who is the responsible party. Risk abatement action items were listed under "action taken" on the old form. Follow up activity is also assigned appropriately. Our deficiency in the past was "enough" documentation of activities and resolution of cases to show the effectiveness of the TAT. This will not only support our record keeping but clarify, for future reference, the incident, actions, and history of the case and individuals involved. A copy of the old form (2 pages) and the new form which is a bit more extensive (9 pages) provided to substantiate our abatement of this item.

San Diego-TAT evaluates compliance of the TAT Guide and develops a check list to monitor compliance when responding to and assessing reports of potentially violent situations.

San Diego-TAT will reconsider the four incidents that the OIG believes had insufficient supporting documentation. TAT will review those incidents and determine the appropriate documentation.

Monitoring and Evaluating Workplace Climate Indicators

Recommendation [9]:

We recommend the Vice President, Pacific Area to:

Direct the Sacramento and San Diego Performance Cluster managers to ensure the threat assessment teams document their evaluations of climate indicators to identify trends and potential hotspots.

Response: The section focuses on responses from the HR Manager and how they review climate indicators. The section then cites 19 employee complaints and makes a speculation that those complaints are significant to the district's moderation of risk to violent situations. This number of employees do not represent a viable sample to extrapolate to a deficiency in the commitment to the zero tolerance policy. In the two districts of this area, this equates to an average of approximately 10 per district for a fiscal year that called the hotline about workplace environment issues. Nevertheless, The Pacific Area has responded to recommendation 9 by:

Sacramento – The District presently monitors climate indicators such as EEO complaints, sick leave usage, grievances, EAP utilization, issues brought up in labor management meetings and District EAP Advisory Committee meeting. We conduct climate assessments for offices the District considers as a potential hot spot. Controls associated with identifying and assessing indicators are being used to reduce the potential for violence in the workplace. OIG Hotline complaints regarding an employee's workplace environment does not constitute that all avenues were exhausted by the employee. It may be that matters are not resolved to that employee's satisfaction which is an individual perception.

San Diego – TAT will document their evaluations of climate indicators to identify trends and troubled worksites at minimum once (1) per quarter.

Team Process and Performance Measures Could Be Improved

Recommendation [10]:

We recommend the Vice President, Pacific Area Operations, direct the Sacramento and San Diego 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: The EAP/Workplace Environment Improvement (WEI) Office web-based TAT Membership & Meeting Tool was designed to ensure management conducts, documents, and disseminates PC TAT meetings in accordance with the *TAT Guide*, effective March 2007. The Pacific Area further responds to recommendation 10 with the following:

Sacramento- The Threat Assessment Team (TAT) meets more frequently than the required bi quarterly (per Pub 108 March 2007) meetings. In accordance with the new Publication our district has been entering the TAT Quarterly meetings for each quarter and verifying minutes are disseminated to the District Manager and Postal Inspector. A copy of Threat Assessment Report (tool) online and copies of quarterly meeting minutes were provided to the OIG to substantiate our abatement of this item.

Our district has been providing minutes to Postal Inspector Bob Stephens, Team Leader for the San Francisco Division Sacramento Domicile for forwarding to the Inspector in Charge in San Francisco. Per Publication 108 March 2007 on page 22 minutes are sent to the District Manager and Inspector in charge. On page 31 under Compliance measures it indicates those minutes are sent to the District Manager and local Postal Inspector.

San Diego- TAT is currently in compliance with this recommendation as of January 2007.

Threat Assessment Team Performance Measures

Recommendation [11]:

We also recommend the Vice President, Pacific Area Operations, direct the San Diego Performance Cluster managers to:

- Ensure the threat assessment team has the requisite number and type of threat assessment team members.

Response: The Pacific Area responds to recommendation 11 with the following:

San Diego- TAT is currently in compliance with this recommendation and has been documented on the Headquarters' WEI Threat Assessment database.

Recommendation [12]:

We recommend the Vice President, Pacific Area Operations, direct the Sacramento Performance Cluster managers to:

- Implement controls to ensure the threat assessment team documents the processes used to measure the team's 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: This recommendation is vague and provides no reference to a requirement that was not met, nor does it indicate how a TAT would measure and provide assurance

that their efforts to prevent violent incidents in the workplace were successful or needed improvement. The measures already suggested in Publication 108 may provide more useful information to identify areas for TAT improvement. Publication 108 outlines different evaluation types, districts are required to conduct post analysis on Priority 1 & 2, but no standard is set as to other cases. We have processes, procedures, priority ratings; and compliance measures, as well as processes for documenting the teams' activities. This recommendation fails to take into account that it is impossible to measure success because we cannot measure the incidents that did not happen. Regardless of our concerns as to the ability of TATs to provide assurances that their efforts are successful or need improvement, the Pacific Area has taken the following action in response to recommendation 12:

Sacramento- We have taken the questions on page 108 of Publication 108 March 2007 and put them into a survey format to be used either as a phone interview or a mail in survey. The TAT team will determine the appropriate party to request feedback from. The TAT will then discuss the responses in our Quarterly meetings. A sample form provided to substantiate our abatement of this item.

San Diego- TAT is currently in compliance using the debriefing model outlined in Pub108, March 2007 (required for Level 1 & 2 incidents), and incorporates and documents the activity in quarterly TAT meetings.

Oversight of the Workplace Violence Prevention Program

Recommendation [13]:

We recommend the Vice President, Pacific Area Operations:

Implement an internal control to ensure Pacific 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.

Response: This recommendation does not relate to any additional findings or failures to meet a requirement in the Postal Service's Violence Prevention and Response Program, but recommends another internal documentation process for all offices in the Pacific Area. In their continued effort to make every effort toward a workplace free of violence, the Pacific Area has agreed to the following with regard to recommendation 13: .

The HR Manger for Pacific Area will ensure that districts are in compliance with Threat Assessment Guide, Pub 108 March 2007 (see page 31), by working with the Pacific Area Manager of Work Place Environment to conduct random audits with the District TAT teams and verify that the districts are in compliance. The Pacific Area Manager of Workplace Environment will provide a report of audit findings to the Pacific Area HR Manager, which will be forwarded to the Area Vice President.

Recommendation [14]:

Determine if the findings in this report exist in the remaining Pacific Area Performance Clusters – Bay-Valley, Honolulu, Los Angeles, San Francisco, Santa Ana, and Sierra Coastal – and, where necessary, take action to ensure management implements adequate controls.

Response: The Pacific Area further responds to recommendation 14 with the following:

There will be randomly selected District TAT team audits conducted with in the Pacific Area throughout the Fiscal year to ensure stated compliance measures above.



A handwritten signature in black ink, appearing to read "Michael J. Daley", is positioned above the printed name.

Michael J. Daley

cc: Manuel Botello