

June 19, 2000

DEBORAH K. WILLHITE  
SENIOR VICE PRESIDENT, GOVERNMENT RELATIONS  
AND PUBLIC POLICY

JAMES C. TOLBERT  
MANAGER, STAMP SERVICES

SUBJECT: Review of the Citizens' Stamp Advisory  
Committee's Criteria and Process Used in  
Reviewing the William Holmes McGuffey  
Historical Society's Stamp Subject Proposal  
(Report Number MK-MA-00-001)

This management advisory report presents the results of our review of the process and criteria used by the Stamp Development Group and Citizens' Stamp Advisory Committee to review the William Holmes McGuffey Historical Society's stamp subject proposal (Project Number 00RR008RG000). The report responds to a congressional request to review the criteria used in selecting commemorative stamp subjects and determine whether the Postal Service provided all required documentation in response to the society's Freedom of Information Act request of January 1999.

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**Results in Brief**

Our review disclosed that the society's stamp proposal had been reviewed by the Stamp Development Group and the committee using publicly disclosed Postal Service criteria and that no additional criteria were used in evaluating stamp subject proposals. At the time of our review, the committee had categorized the society's stamp proposal as "under consideration." Stamp subjects may remain under consideration for years, until the subject is selected for issuance or removed from consideration.

Although the society's stamp proposal was still being considered, we noted that response letters to the society did

not fully explain the status of its stamp subject proposal or that stamp subjects may be grouped according to themes of national interest. Stamp subject proposals categorized into groups could also be considered for issuance in the future.

In addition, we noted that the Postal Service did not provide all of the required documentation to fully respond to the society's Freedom of Information Act request and appeal. According to Stamp Development officials, personnel handling the Freedom of Information Act request, mistakenly did not copy all of the relevant documents. We believe this may have occurred because the stamp proposal filing system did not contain a record of all documents received or actions taken in association with the society's stamp proposal.

We suggested that the senior vice president of Government Relations and Public Policy and the manager of Stamp Services: (1) tailor their standard response letters to include more detailed information, (2) advise the society that their stamp subject is still eligible for future issuance, (3) revise the pamphlet Creating U.S. Postage Stamps, (4) determine whether the society should receive additional correspondence, and (5) create a database for stamp subject proposals.

Management generally agreed with the report's suggestions and actions currently underway or planned should address the issues identified in this report.

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## Background

The committee, an independent committee of the Postal Service, was created in 1957 to select stimulating and educational subjects for stamps. The committee<sup>1</sup> is composed of members who are appointed by the postmaster general and represent a wide range of expertise in history, art, education, sports, science, and technology, and other subjects of public interest. A stated goal of the committee is to create a broad-based, well-rounded program with wide public appeal. To this end, the committee groups subjects together by theme such as musicians, inventors, submarines, and deep-sea creatures. The committee has the authority to transfer subjects

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<sup>1</sup> The committee may have as many as fifteen members, with no set minimum.

between categories and receives approximately 50,000 proposals for stamp subjects each year.

The Postal Service accepts proposals for commemorative stamp subjects, but not stamp designs, and the committee considers new stamp proposals at closed quarterly meetings. These new stamp proposals must meet three general and 12 specific criteria, as defined by the Postal Service (see Appendix A). At each meeting, the committee reviews and selects stamp proposals and provides guidance on designs and artwork. The committee presents selected subjects and corresponding designs for stamps and stationery to the postmaster general for final approval.

The Stamp Development Group of the Postal Service handles letters acknowledging receipt and consideration of stamp subject proposals and other administrative matters. Due to the large volume of stamp subject proposals, they are screened by the Stamp Development Group to expedite the stamp selection process.

Proposals for a stamp commemorating William Holmes McGuffey date back to 1949. Additionally, three bills have been presented before Congress for the issuance of such a stamp. Correspondence in support of this subject throughout the last three decades has come from businessmen, teachers, retired citizens, congressmen, and two historical societies.

William Holmes McGuffey is the author of an influential schoolbook, The McGuffey Reader, a graded series of six books. The McGuffey Reader was created to be an influence in forming the minds of nineteenth century American children, offering moral lessons along with practical knowledge. First published in 1836, it is estimated that over 100 million copies were sold, and schools in 37 states adopted The McGuffey Reader for use.

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**Prior Review  
Coverage**

We issued a report entitled Review of the Operations of the Citizens' Stamp Advisory Committee in July 1999. The objective of that review was to examine how new stamp proposals were evaluated and whether committee policy decisions were documented. We suggested that the committee record strategic policy decisions in a readily usable format and that committee membership should be

increased. Postal Service management agreed with both suggestions.

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**Objective, Scope, and  
Methodology**

This review was conducted in response to a congressional request. The objective of the review was to examine the processes and criteria used by the Stamp Development Group and the committee for screening and selecting stamp subjects. We reviewed correspondence between the Postal Service and the society pertaining to this stamp subject proposal.

We interviewed members of Stamp Services and the Stamp Development Group, observed the physical location of the file storage for stamp subject correspondence, and reviewed the processes and criteria used by the Stamp Development Group and the committee. With the assistance of the General Counsel of the Office of Inspector General, we obtained and analyzed all documentation related to the William Holmes McGuffey stamp subject proposal.

This review was conducted from February through June 2000 in accordance with the President's Council on Integrity and Efficiency, Quality Standards for Inspections. We discussed our conclusions and observations with appropriate management officials and included their comments, where appropriate.

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**Established Criteria  
and Processes**

All stamp subject proposals submitted to the committee are supposed to be reviewed by the Stamp Development Group. Using guidance from the committee, the Stamp Development Group determines whether stamp subject proposals have been issued in the past ten years, previously considered and not recommended by the committee, or are already under consideration for issuance. Subjects included in one of these three categories are eliminated from consideration. A letter acknowledging receipt of a subject proposal and its status is sent to the person(s) or organization recommending the subject. The remaining stamp subjects are evaluated using criteria<sup>2</sup> published in the Creating U.S. Postage Stamps pamphlet. If proposed stamp subjects meet these criteria, the subjects are presented to the committee for review.

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<sup>2</sup> The 12 published criteria can be found in Appendix A.

When reviewing new subjects, the committee takes one of two actions; stamp subjects are either categorized as "not recommended" for issuance or "under consideration." Subjects categorized as "not recommended" are those determined by the committee to be unsuitable for issuance because they may represent tragedies, disasters, or are otherwise negative in nature. Subjects categorized as "under consideration" are reviewed quarterly by the committee, which selects about 30 stamp subjects each year to recommend to the postmaster general for a national stamp program. The national stamp program is comprised of various themes of national interest.

Each year, the committee establishes several general themes for the national stamp program. Occasionally, stamp subjects are selected for individual issuance; however, subjects have a better chance for selection as part of a general theme. According to personnel in the Stamp Development Group, the William Holmes McGuffey proposal may be considered for an educational theme in the future.

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**Status of Stamp  
Proposal**

At the time of our review, the William Holmes McGuffey proposal had been included in the "under consideration" category for at least five years. According to Stamp Development officials this is not unusual, since stamp subjects can remain "under consideration" for an extended period of time before being selected for issuance. As examples, both the Audie Murphy stamp of the Distinguished Soldiers series issued in 2000 and the Royal Poinsettia stamp of the Tropical Flowers series issued in 1999 were selected for issuance after being under consideration for more than five years. Therefore, the William Holmes McGuffey subject can be selected for issuance as long as it remains in the "under consideration" category.

The society should have known the status of their stamp proposal, since the Stamp Development Group responds by letter to each proposal it receives. However, the letters are based on standard formats that are tailored to respond to each proposal and the letters did not completely explain the status of the society's proposal. Specifically, the letters stated that the proposal was "under consideration" but did

not explain that the proposal was still eligible for selection for future national stamp programs.

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**Freedom of  
Information Act  
Request**

In an effort to better determine the status of and criteria used to review its stamp subject proposal, the society submitted a Freedom of Information Act request on January 6, 1999. Under this request, the society only received 32 documents, which did not include all of the society's correspondence associated with its stamp proposal. As a result, the society filed an appeal requesting additional information on March 16, 1999, and received an additional 13 documents.

During our review, we identified 27 additional documents that we believe should have been considered responsive to the society that were not included as part of its Freedom of Information request or appeal. However, we were unable to determine why all the documents were not provided to the society. Officials in the Postal Service's Law Department stated that they provided all the documents on file in the Stamp Development Group to the society. Stamp Development Group officials stated that they provided the entire William Holmes McGuffey stamp proposal file, including the additional documents identified during our review, to the Law Department and could not explain why all the documents were not received by the society. In a subsequent conversation, an official in the Stamp Development Group agreed to ensure the society received any additional documentation identified through our review.

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**Record Control**

While Stamp Development Group officials did not raise it as an issue, we noted that the system used to track stamp subject proposals needed improvement and may have contributed to the mistake of all documents not being sent to the society. The current filing system in Stamp Development may benefit from enhancements to determine whether the files contain all relevant documents. The system does not include a record of all documents received or actions taken in connection with those documents. In addition, there is no record of the documents transferred to the Kansas City Fulfillment Center for storage. By maintaining a database, the Stamp Development Group would have a more accurate record of stamp subject proposals and all relevant correspondence.

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<b>Suggestion</b>	<p>We suggest that the senior vice president of Government Relations and Public Policy and manager of Stamp Services:</p> <ol style="list-style-type: none"><li>1. Provide guidance on tailoring the standard response letters generated by the Stamp Development Group to require more detailed information regarding the status of a stamp subject proposal.</li></ol>
<b>Management's Comments</b>	<p>Postal Service management agreed with this suggestion and stated that the customer response process is currently under review, language that addresses the timeframe for issuance of stamp subjects is regularly included, and applicable audit recommendations in this area will be incorporated where appropriate.</p>
<b>Suggestion</b>	<ol style="list-style-type: none"><li>2. Advise the William Holmes McGuffey Historical Society that its stamp subject proposal is currently categorized as "under consideration" and is still eligible to be selected as a commemorative stamp.</li></ol>
<b>Management's Comments</b>	<p>Postal Service management agreed with this suggestion and responded that the William Holmes McGuffey Historical Society will be advised that currently their stamp subject proposal is under consideration as a future stamp issuance.</p>
<b>Suggestion</b>	<ol style="list-style-type: none"><li>3. Revise the <u>Creating U.S. Postage Stamps</u> pamphlet to include a more detailed description of the status categories and the importance of the general themes of national interest.</li></ol>
<b>Management's Comments</b>	<p>Postal Service management agreed with this suggestion and responded that applicable recommendations in this area will be incorporated into the revised pamphlet, scheduled for reprint this year.</p>
<b>Suggestion</b>	<ol style="list-style-type: none"><li>4. Determine whether to provide the additional correspondence identified by the Office of Inspector General related to the William Holmes McGuffey stamp subject proposal as requested in the society's Freedom of Information Act request.</li></ol>

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<b>Management's Comments</b>	Management agreed with this suggestion and stated that the William Holmes McGuffey Society will receive any additional correspondence identified in this review that is responsive to their Freedom of Information Act request.
<b>Suggestion</b>	5. Create a database to record and monitor correspondence related to stamp subject proposals, including information such as the subject, proposal status, number of inquiries, dates of correspondence, and themes for which the proposal may be considered.
<b>Management's Comments</b>	Management agreed with this suggestion and responded that staff within the Public Policy group have been tasked with researching the creation of a stamp database.
<b>Overall Evaluation of Management's Comments</b>	<p>Management's comments are responsive to our suggestions and the actions taken or planned should correct the conditions identified in this report.</p> <p>We appreciate the cooperation and courtesies provided by your staff during this review. If you have any questions, please contact [REDACTED], or me at (703) 248-2300.</p> <p>Ronald K. Stith Acting Assistant Inspector General for Business Operations</p> <p>Attachments</p> <p>cc: Terrence W. McCaffrey John R. Gunnels</p>



## APPENDIX A. CRITERIA FOR STAMP SUBJECT SELECTION

The Postal Service and the members of the Citizens' Stamp Advisory Committee have set certain basic criteria for determining the eligibility of subjects for commemoration on U.S. stamps and stationery. These criteria were first formulated about the time of the Postal Reorganization in the early 1970's, and have been refined and expanded gradually since then.

The following are the 12 major criteria now guiding subject selection:

1. It is a general policy that U.S. postage stamps and stationery primarily will feature American or American related subjects.
2. No living person shall be honored on a U.S. postage stamp.
3. Commemorative stamps or postal stationery honoring individuals will be issued on, or in conjunction with, significant anniversaries of their birth, but no postal item will be issued sooner than ten years after the individual's death. The only exception to the ten-year rule is the issuance of stamps honoring deceased U.S. Presidents. They may be honored with a memorial stamp on the first birth anniversary following their death.
4. Event of historical significance shall be considered for commemoration only on anniversaries in multiples of 50 years.
5. Only events and themes of widespread national appeal and significance will be considered for commemoration. Events or themes of local or regional significance may be recognized by a philatelic or special cancellation, which may be arranged through the local postmaster.
6. Stamps or stationery items shall not be issued to honor fraternal, political, sectarian, or service/charitable organizations that exist primarily to solicit/distribute funds. Nor shall stamps be issued to honor commercial enterprise or products.
7. Stamps or stationery items shall not be issued to honor cities, towns, municipalities, counties, primary or secondary schools, hospitals, libraries, or similar institutions. Due to the limitations placed on annual postal programs and the vast number of such locales, organizations and institutions in existence, it would be difficult to single out one for commemoration.
8. Requests for observance of statehood anniversaries will be considered for commemorative postage stamps only at intervals of 50 years from the date of the state's first entry into the union. Requests for observance of other state-related or regional anniversaries will be considered only as subjects for postal stationery, and again only at intervals of 50 years from the date of the event.

9. Stamps or stationery items shall not be issued to honor religious institutions or individuals whose principle achievements are associated with religious undertakings or beliefs.
10. Stamps or postal stationery items with added values, referred to as "semi-postals," shall not be issued. Due to the vast number of worthy fund-raising organizations in existence, it would be difficult to single out specific ones to receive such revenue. There also is a strong U.S. tradition of private fund-raising for charities, and the administrative costs involved in accounting for sales would tend to negate the revenues derived.
11. Requests for commemoration of significant anniversaries of universities and other institutions of higher education shall be considered only in regard to Historic Preservation Series postal cards featuring an appropriate building on the campus.
12. No stamp shall be considered for issuance if one treating the same subject has been issued in the past 10 years. The only exceptions to this rule will be those stamps issued in recognition of traditional themes such as Christmas, U.S. Flags, Express Mail, Love, etc.

## APPENDIX B. MANAGEMENT'S COMMENTS

DEBORAH K. WILLHITE  
SENIOR VICE PRESIDENT  
GOVERNMENT RELATIONS AND PUBLIC POLICY



June 7, 2000

ROBERT L. EMMONS

SUBJECT: Transmittal of Draft Report—Review of the Citizens' Stamp Advisory  
Committee's Criteria and Process Used in Reviewing the William Holmes  
McGuffey Historical Society's Stamp Subject Request  
(Report Number MK-MA-00-DRAFT)

We have reviewed the subject report and generally agree with the audit recommendations. However, several suggestions require clarification:

- The customer response process utilized by Stamp Development is currently under review. Applicable audit recommendations will be incorporated where appropriate. Language that addresses the time frame for the issuance of stamp subjects is regularly included in customer responses. This information will also be included in the revised version of the *Creating U.S. Postage Stamps* pamphlet which will be reprinted later this year.
- The Citizens' Stamp Advisory Committee was established in 1957. Stamp Development does not maintain stamp proponent files or records dating back to 1949 (refer to page five of the audit report). Currently, the William Holmes McGuffey nomination is under consideration as a future stamp issuance. However, that has not always been the status as indicated in the April 21, 1977, letter from the Philatelic Information Branch. At that time, the Committee reviewed the proposal and did not recommend stamp issuance.

Based on audit recommendations, the William Holmes McGuffey Historical Society will be advised of the current status of the William Holmes McGuffey proposal. The Society will also be informed that the subject will remain an option to consider as future stamp programs are developed. Any additional correspondence identified by your office as responsive to the freedom of Information Act request will be included with the letter.

- Several years ago, a stamp database was developed by the Headquarters Information Systems staff. The database development was a major undertaking requiring funding, constant analysis, and staffing outside of our internal capabilities. The final version of the stamp database was cumbersome, time consuming, and was not user friendly. Due to a lack of available funding, the contract was cancelled and the project was discontinued. A renewed interest in this effort has been tasked within the Public Policy Group and a stamp database is being explored.

A handwritten signature in black ink, appearing to read "Deborah K. Willhite".

Deborah K. Willhite

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**Major Contributors to  
This Report**

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