

January 30, 2003

JERRY D. LANE
MANAGER, CAPITAL METRO OPERATIONS

SUBJECT: Audit Report – Sexual Harassment Prevention Measures in the Northern Virginia and Richmond Districts – Capital Metro Operations
(Report Number LH-AR-03-003)

This report presents the results of our audit of sexual harassment prevention measures in the Northern Virginia and Richmond Districts, Capital Metro Operations (Project Number 02YG010LH001). Our overall objective was to determine if the districts had adequate policies and procedures in place to prevent sexual harassment in the workplace, and to effectively address sexual harassment complaints to mitigate liability. This report is based on a self-initiated review, and is the third in a series of ten reports we will be issuing regarding sexual harassment prevention measures Postal Service-wide.

We found that the Northern Virginia and Richmond Districts' sexual harassment policies and procedures were adequate, employees found responsible for sexual harassment or inappropriate actions/comments were appropriately disciplined or corrective action was taken, and managers/supervisors were considered for exclusion from the Pay for Performance Program. In addition, although no Postal Service national policy existed regarding the retention time for informal complaint files, both districts were retaining files indefinitely and storage of files was adequate. We also found, however, that most sexual harassment complaints in both districts were not effectively addressed. The Northern Virginia district manager advised us some action has been taken to correct the deficiency in this district.

The report included two recommendations to help the Northern Virginia and Richmond Districts improve their sexual harassment prevention program. Management agreed with part of recommendation 1 and all of recommendation 2. The actions taken and planned should correct some of the issues identified in this report. Management disagreed, however, with the finding that most complaints were not effectively addressed, and disagreed with part of recommendation 1 to fully document detailed evidence of the actions taken to address complaints. The Office of Inspector General (OIG) considers that part of recommendation 1 as unresolved and will address it in a separate capping report to the senior vice president, Human Resources.

Management's comments and our evaluation of these comments are included in this report.

The OIG considers recommendations 1 and 2 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, please contact Chris Nicoloff, director, Labor Management, at (214) 775-9114, or me at (703) 248-2300.

B. Wayne Goleski
Assistant Inspector General
for Core Operations

Attachment

cc: Suzanne F. Medvidovich
Murry E. Weatherall
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EXECUTIVE SUMMARY

Introduction

This report presents the results of our audit of sexual harassment prevention measures in the Northern Virginia and Richmond Districts, located in Capital Metro Operations. This review was self-initiated to determine if the districts had adequate policies and procedures in place to prevent sexual harassment in the workplace, and to effectively address sexual harassment complaints to mitigate liability.

Results in Brief

The audit revealed that the Northern Virginia and Richmond Districts' sexual harassment policies and procedures were adequate and that employees found responsible for sexual harassment or inappropriate actions/comments were appropriately disciplined or corrective action was taken. We also found that managers/supervisors responsible for sexual harassment or inappropriate actions/comments were considered for exclusion from the Pay for Performance Program. In addition, although no Postal Service national policy existed regarding the retention time for informal complaint files, both districts were retaining files indefinitely and storage of files was adequate. Finally, we found that most sexual harassment complaints in both districts were not effectively addressed. The Northern Virginia district manager advised us some action has been taken to correct this deficiency in this district.

Summary of Recommendations

The report includes two recommendations to help the Northern Virginia and Richmond Districts improve their sexual harassment prevention program. We recommended management establish controls to ensure managers and supervisors effectively address all sexual harassment complaints and inappropriate actions/comments of a sexual nature and fully document detailed evidence of the actions taken to address complaints; and the Equal Employment Opportunity office notify district management of all complaints of sexual harassment or inappropriate actions/comments of a sexual nature.

**Summary of
Management's
Comments**

Management agreed with part of recommendation 1 that managers and supervisors must effectively address all sexual harassment complaints.

Management stated that they conducted fact-finding training for investigators and will send memorandums to all employees reiterating their obligations regarding sexual harassment in the workplace.

Management disagreed, however, with the finding that most sexual harassment complaints were not effectively addressed and with part of recommendation 1 that they fully document detailed evidence of the actions taken to address complaints. They stated this would require they depart from Postal Service policy. They said they fully recognized and supported their responsibilities and believe their managers fulfilled their obligations in that regard. Management also stated that because our report proposed changes to Postal Service policy, any changes to the policy should be addressed to Postal Service Headquarters.

Management agreed with recommendation 2 that the district Equal Employment Opportunity office notifies management of all complaints and this will be reiterated in a memorandum to all district managers by February 2003.

Finally, management was unable to confirm the expenditure of \$154,750 stated in the background of the report and further stated the report made determinations based on requirements that extended beyond Postal Service policy. Management's comments, in their entirety, are included in Appendix B of this report.

**Overall Evaluation of
Management's
Comments**

Management's actions taken or planned are responsive to the first part of recommendation 1 and recommendation 2. However, management's response is not responsive, and does not meet the full intent of the second part of recommendation 1, to fully document detailed evidence of the actions taken to address complaints. We believe that management's concern that following the recommendation would cause it to depart from Postal Service policy is unfounded. Postal Service policy is clear that serious complaints must be documented and further provides that "When in doubt, document." We believe the policy

does not limit management from documenting all actions. Additionally, we agree with management that a change to national policy should be referred to the headquarters level, and the report states we will address this in our capping report. The OIG considers recommendation 1 as unresolved and will address it in a separate capping report.¹

¹We will issue a capping report on the audit results for the nine areas we visited, including Capital Metro Operations, where recommendations regarding national policy will be made to the senior vice president, Human Resources.

INTRODUCTION

Background

Sexual harassment is defined by law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that becomes a term or condition of employment. According to a Postal Service Law Department report, in fiscal years (FY) 2000 and 2001, the Postal Service paid approximately \$154,750² for sexual harassment judgments and settlements in Capital Metro Operations.

Objective, Scope, and Methodology

Our overall objective was to determine if the districts had adequate policies and procedures in place to prevent sexual harassment in the workplace, and to effectively address sexual harassment complaints to mitigate liability. Our objective, scope, and methodology are discussed in Appendix A.

Prior Audit Coverage

We did not identify any prior audits or reviews related to the objective of this review in these two districts.

² This amount represents two complaints. Neither complaint was within the scope of our review.

AUDIT RESULTS

Policies and Procedures Adequate

We found that the Northern Virginia and Richmond Districts had adequate policies and procedures that should enable district management to identify and prevent sexual harassment or inappropriate actions/comments, and provide management with guidance to respond effectively to complaints, thus mitigating liability and costs.

We also found the districts:

- Established as district policies, Postal Service Publication 552, Manager's Guide to Understanding Sexual Harassment, and Publication 553, Employee's Guide to Understanding Sexual Harassment.
- Used Voice of the Employee surveys³ to monitor the work environment and when necessary provided additional training to raise awareness.

We also found:

- Capital Metro Operations issued a tool kit in February 1999, to internal investigative team members that provided a step-by-step guide for conducting a prompt and thorough investigation.
- The Richmond District introduced a program in April 2000, entitled, "Principled Leadership," to all employees. The program consisted of a video and pamphlet pledging six principled leadership skills including the prevention of sexual harassment.

³ The Voice of the Employee survey was a data collection instrument that the Postal Service had established to help improve workplace relationships and to ensure all employees were treated with fairness, felt safe in their workplace, had opportunities to participate in improvements, and took pride in being Postal Service employees.

Employees Appropriately Disciplined or Corrective Action Taken

We found that employees responsible for sexual harassment or inappropriate actions/comments were appropriately disciplined, or corrective action was taken.

Equal Employment Opportunity Commission 1990 and 1999 guidelines recommended agencies take immediate and appropriate corrective action, including discipline, when sexual harassment occurred. Postal Service policy stated employees engaged in sexual harassment would be subject to disciplinary action, up to and including removal. The policy also stated that disciplinary action might result even if the conduct was not sexual harassment as defined by the law, but was inappropriate and of a sexual nature.

Our review of formal and informal⁴ complaints in the Northern Virginia and Richmond Districts showed that:

- Of the nine formal and informal sexual harassment complaints filed in the Northern Virginia District, sexual harassment or inappropriate actions/comments were not substantiated in four, and substantiated in three. For the remaining two complaints, management did not conduct an inquiry or investigation to determine whether sexual harassment or inappropriate actions/comments had occurred, and thus no discipline or corrective action was considered or taken.
 - In the three substantiated complaints, three employees were involved--two were appropriately disciplined and the third employee resigned.
- Of the eight formal and informal complaints filed in the Richmond District, sexual harassment or inappropriate actions/comments were not substantiated in two, and substantiated in three. For the remaining three complaints, management did not conduct an inquiry or investigation to determine whether sexual harassment or inappropriate actions/comments had occurred, and thus no discipline or corrective action was considered or taken.

⁴ The term “informal” complaint refers to those not filed using the Equal Employment Opportunity process.

- In the three substantiated complaints, three employees were involved and all were appropriately disciplined or corrective action was taken.

- In response to an unsubstantiated anonymous complaint in the Richmond District, a climate assessment was conducted that resulted in the implementation of an action plan that included steps to reduce sexual harassment.

**Managers/
Supervisors
Considered for
Exclusion from Pay
for Performance**

We found that managers/supervisors found responsible for sexual harassment or inappropriate actions/comments were considered for exclusion from the Pay for Performance Program⁵ in the Northern Virginia and Richmond Districts.

Equal Employment Opportunity Commission guidelines included a reduction in wages as an effective corrective measure to stop harassment and ensure it does not reoccur. Postal Service policy stated an employee whose conduct was clearly unacceptable may be excluded from the Pay for Performance Program. The Postal Service described unacceptable behavior as “notoriously disgraceful or immoral conduct, or other conduct prejudicial to the Postal Service.”

We found:

- Three employees in the Northern Virginia District were found responsible for sexual harassment or inappropriate actions/comments. One was a manager/supervisor who was eligible for the Pay for Performance Program and was excluded.
- Three employees in the Richmond District were found responsible for sexual harassment or inappropriate actions/comments. Two were managers/supervisors who were eligible for the Pay for Performance Program and were considered for exclusion.
 - One manager/supervisor was given a “Notice of Proposed Reduction in Grade and Pay,” however; he took a voluntary downgrade and was excluded from the program for FY 2000.
 - The other manager/supervisor also took a voluntary downgrade but was not excluded, and received \$2,038 in Pay for Performance.

⁵ The Pay for Performance Program, formerly referred to as the Economic Value Added Program, was an incentive award program for nonbargaining employees. The amount of money received by each employee was based on a group achievement of performance targets and financial measurements.

- District management stated exclusions from the program were evaluated on a case-by-case basis, and in this case it was determined that since the manager/supervisor acknowledged wrongdoing, the voluntary downgrade more than compensated for the inappropriate action.

**Most Complaints Not
Effectively
Addressed**

Our audit disclosed that 12 of the 17 complaints were not effectively addressed in the Northern Virginia and Richmond Districts. Equal Employment Opportunity Commission guidelines defined an “effective” investigation as a prompt, thorough, and impartial review with documented evidence. Postal Service policy required managers to conduct sexual harassment inquiries promptly and investigate all complaints, and document “serious” complaints with detailed evidence.⁶

We found that:

- Postal Service national policy did not require that “all” complaints be documented—only those that managers believed were “serious.”
- Of the nine formal and informal complaints filed in the Northern Virginia District, two were effectively addressed and seven were not.
 - For the seven not effectively addressed, four were not prompt, one was not thorough, and two were not investigated.
 - District management provided several reasons why complaints were not effectively addressed. For example, they said for the two complaints not investigated, the complaints were filed directly with the Equal Employment Opportunity office and that office did not notify district management. This precluded them from conducting their own investigation.
- Of the eight formal and informal complaints filed in the Richmond District, three were effectively addressed and five were not.
 - For the five not effectively addressed, two were not prompt and three were not investigated.

⁶ Publication 552 was revised effective September 2001, and replaced the term “serious” with the statement “some complaints can be resolved simply and directly between the parties without the need for a formal written record.” The revised policy also provided that managers/supervisors needed to decide early in the process whether formal documentation was warranted, and that a good rule of thumb was when in doubt, document.

- District management stated they were not working in the district when the complaints were made and thus could not provide an explanation why complaints were not effectively addressed.

During this audit, the Northern Virginia District manager took action to correct the problem we identified. He stated he instructed the Equal Employment Opportunity office to notify the district Human Resources or Labor Relations manager of all sexual harassment complaints.

Complaints not effectively addressed could result in liability because the Postal Service cannot demonstrate it exercised reasonable care to prevent and promptly correct harassing behavior. We believe the lack of a Postal Service policy requiring documentation of all complaints and the lack of communication between the Equal Employment Opportunity office and district management may have been factors. We will address these issues in a separate report.

Recommendation

We recommend the manager, Capital Metro Operations, instruct the Northern Virginia and Richmond District managers to establish controls to ensure:

1. Managers and supervisors effectively address all sexual harassment complaints and inappropriate actions/comments of a sexual nature and fully document detailed evidence of the actions taken to address complaints.

**Management's
Comments**

Management agreed with the part of the recommendation that managers and supervisors must effectively address all sexual harassment complaints, consistent with the law and Postal Service policy. They disagreed, however, with the finding. They stated they firmly endorsed the concept that sexual harassment cannot, and will not, be tolerated. Management also said they recognized and supported their responsibility to make every reasonable effort to prevent sexual harassment and correct any sexual harassing behavior. They said they believe their managers fulfilled their obligations in that regard.

Management further stated that in support of their obligations, they conducted fact-finding training for Postal Service investigators in 2002, and will send in this fiscal

year, memorandums to both craft and Executive and Administrative Service employees, reiterating their obligations regarding sexual harassment in the workplace. They said the first memorandum will be mailed to Executive and Administrative Service employees in quarter 3; and the one to all employees, will be mailed in quarter 4.

Management disagreed with the part of the recommendation to fully document detailed evidence of the actions taken to address complaints stating this required management in some instances, to depart from Postal Service policy that “some complaints can be resolved simply and directly between parties without the need for a formal written record.” Management stated that Northern Virginia and Richmond Districts were consistent with Postal Service policy.

Management also stated that because our report proposed changes to Postal Service policy, any changes to the policy should be addressed at the national level, not area, and should be referred to Postal Service Headquarters.

**Evaluation of
Management’s
Comments**

Management’s actions are responsive to the first part of our recommendation, however, they are not responsive and do not meet the intent of the second part of the recommendation. We believe documentation plays an important role in determining credibility and mitigating liability. Specifically, it provides a record of the action management took to address and resolve sexual harassment complaints. We believe that management’s concern that following the recommendation would cause it to depart from Postal Service policy is unfounded. Postal Service policy is clear that serious complaints must be documented, and further provides that “When in doubt, document.” We believe the policy does not limit management from documenting all actions; it simply establishes a floor, not a ceiling for addressing complaints.

We agree with management that a change to national policy should be referred to the headquarters level, and the report states we will address this in our capping report to the senior vice president, Human Resources. We believe however, that by implementing the recommendation now, Capital Metro Operations would be at the forefront of enhancing their sexual harassment prevention program. We view the

disagreement on this recommendation as unresolved and it will be addressed in our capping report.

Recommendation

We recommend the manager, Capital Metro Operations, instruct the Northern Virginia and Richmond District managers to establish controls to ensure:

2. The Equal Employment Opportunity office notifies district management of all complaints of sexual harassment or inappropriate actions/comments of a sexual nature.

**Management's
Comments**

Management agreed with our recommendation and stated the district Equal Employment Opportunity office should notify management of all complaints of sexual harassment or inappropriate actions/comments. They stated this is consistent with current Capital Metro Operations policy and will send a memo to all district managers to reiterate the present policy by February 14, 2003.

**Evaluation of
Management's
Comments**

Management's actions taken or planned should correct the issues identified in the report.

**File Retention and
Storage Adequate**

Our audit found there was no Postal Service policy regarding the retention time for informal complaint files. However, both districts retained informal complaint files indefinitely and storage of files was also adequate.

Equal Employment Opportunity Commission guidance stated formal sexual harassment complaint files should be retained for at least 4 years after resolution of the complaint. Postal Service policy stated once an inquiry/investigation was conducted, files should be forwarded for storage, to the district Human Resources manager. According to a headquarters senior Postal Service manager, the intent of this policy was to centrally locate the files with the Human Resources manager.

Retaining and storing informal complaint files in a central location ensures file availability if needed to mitigate liability. We will address the need for a national retention policy in a separate report.

**Additional
Management's
Comments**

Management stated they were unable to confirm the referenced expenditure of \$154,750 noted in the background section of the report. Management further stated the report made determinations of whether complaints were effectively addressed based on requirements that extended beyond current Postal Service policy.

**Evaluation of
Management's
Comments**

The \$154,750 expenditure was contained in a report provided to us by the Postal Service Law Department. It was used in our report as background information only, and thus we did not conduct a verification of its accuracy. We have clarified, however, that it was Postal Service data.

We disagree with management's comment that the requirements we used to determine effectiveness were beyond current Postal Service policy. To determine promptness, we used a standard that if action was taken within 48-hours from when a complaint was received, it would be considered prompt. This standard was based on Equal Employment Opportunity Commission and Postal Service guidelines, the definitions of "prompt" and "immediate" (used in guidelines and policy), and discussions with Postal Service Headquarters officials. In addition, the standard was discussed with, and agreed to, by headquarters officials prior to audit work. One vice president told us he expected his managers or supervisors to respond to a complaint within 24 hours.

APPENDIX A. OBJECTIVE, SCOPE, AND METHODOLOGY

Our objective was to determine if the Northern Virginia and Richmond Districts, in Capital Metro Operations, implemented adequate policies and procedures to prevent sexual harassment⁷ in the workplace and to effectively address sexual harassment complaints to mitigate liability. Our district selections were based on interviews with the senior vice president, Human Resources; vice president, Diversity Development; and manager, Capital Metro Operations. We also considered the number of closed formal sexual harassment complaints in each of the four Capital Metro Operations districts.

To accomplish our objective, we reviewed applicable laws, policies, procedures, and other documents including Equal Employment Opportunity Commission guidelines; Postal Service national policies; and the Capital Metro Operations, Northern Virginia and Richmond District policies for preventing sexual harassment in the workplace. We also reviewed Postal Service national policy regarding the Pay for Performance Program. In addition, we reviewed previously issued OIG reports related to sexual harassment issues. Further, we interviewed Postal Service Headquarters, Capital Metro Operations, and Northern Virginia and Richmond District officials.

To determine if adequate policies and procedures were in place to prevent sexual harassment from occurring in the workplace, we identified Equal Employment Opportunity Commission key recommendations to agencies regarding policies and procedures that should be in place to prevent sexual harassment and reduce the risk of agency liability. We then reviewed the Postal Service national, Capital Metro Operations, and Northern Virginia and Richmond Districts' policies and procedures to determine if the recommendations were included.

To determine whether district managers effectively addressed informal sexual harassment complaints to mitigate liability, we analyzed the documentation contained in formal and informal complaint files that were filed and closed⁸ in FYs 2000 and 2001,⁹ for the two districts we selected. We recorded information related to promptness, thoroughness, impartiality, and the level of documentation. These fiscal years were chosen because they were the most recent and complete fiscal years at the time of our fieldwork. The number of formal and informal closed complaints was obtained from the Postal Service Equal Employment Opportunity case file database and district management, respectively. We then excluded those complaints where the employees filed their complaints directly with the Equal Employment Opportunity office and requested confidentiality. These were excluded because honoring the request for

⁷ For the purpose of this report, we used the legal definition of sexual harassment as unwelcome sexual conduct that is a term or a condition of employment (29 C.F.R. § 1604.11(a)). In addition, we included the Postal Service policy regarding inappropriate actions/comments of a sexual nature when reviewing sexual harassment complaint files.

⁸ Sexual harassment complaints may be considered closed for a number of reasons including (1) the inquiry/investigation was completed, (2) a settlement had been reached, (3) the complaint was withdrawn, or (4) discipline or corrective action was taken.

⁹ We used Postal Service fiscal years that started September 11, 1999, and ended September 7, 2001.

confidentiality precluded the Equal Employment Opportunity office from notifying district management that a complaint had been made. This in turn precluded management from conducting an investigation. We determined there were 17 closed complaint files as follows:

District	Complaints		Total Complaints Per District
	Formal	Informal	
Northern Virginia	4	5	9
Richmond	3	5	8
Total	7	10	17

We also determined if the retention and storage of informal files were adequate using Postal Service national, area, and district policies as well as Equal Employment Opportunity Commission guidelines.

In addition, we determined whether employees found responsible for sexual harassment received appropriate discipline using Equal Employment Opportunity Commission guidelines, Postal Service policies and procedures, and some elements of the Douglas Factors.¹⁰ We included in this determination whether or not managers or supervisors found responsible for sexual harassment or inappropriate actions/comments were considered for exclusion from the Pay for Performance Program.

This audit was conducted from February 2002 through January 2003 in accordance with generally accepted government auditing standards and included such tests of internal controls as were considered necessary under the circumstances. We discussed our conclusions and observations with appropriate management officials and included their comments, where appropriate.

¹⁰ The Douglas Factors were developed as a result of case law (*Douglas v. Veterans' Administration*) where the Merit Systems Protection Board ruled that management must document certain factors to be considered in making a determination of appropriate disciplinary action.

APPENDIX B. MANAGEMENT'S COMMENTS

MANAGER
CAPITAL METRO OPERATIONS



January 13, 2003

B. WAYNE GOLESKI

SUBJECT: Draft Audit Report: Sexual Harassment Prevention Measures in the Northern Virginia and Richmond Districts, Capital Metro Operations (Report Number LH-AR-03-DRAFT)

Thank you for the opportunity to submit this revised response to the above-referenced draft audit report dated December 10, 2002. Capital Metro Operations shares your interest in ensuring that we have an exceptional sexual harassment prevention program, and we hope that we will be regarded as a model employer in the area of sexual harassment prevention.

With regard to the conclusions reached in the above-referenced audit, Capital Metro Operations agrees with your conclusions that our two districts had adequate sexual harassment policies and procedures in place; that employees who were found to be responsible for sexual harassment or inappropriate action were appropriately disciplined and appropriate action was taken; and that responsible management officials were considered for exclusion or excluded from the "pay for performance" program. We also agree with your conclusion that our district document storage and file retention practices were adequate. However, we are not able to agree with your conclusion that most sexual harassment complaints in both districts were not adequately addressed, because we believe that our managers are generally fulfilling their obligations under the law and postal policy.

With regard to the specific recommendations contained within the draft audit report, we respond as follows.

Recommendation # 1

Managers and supervisors effectively address all sexual harassment complaints and fully document detailed evidence of the actions taken to address complaints.

Response

We agree with the part of the recommendation that managers and supervisors must effectively address all sexual harassment complaints, consistent with the law and Postal Service policy. Capital Metro Operations firmly endorses the concept that sexual harassment can not, and will not, be tolerated in the workplace. We fully recognize and support management's responsibility to make every reasonable effort to prevent sexual harassment and correct any sexually harassing behavior. We believe our managers are fulfilling their obligation in that regard.

In support of our obligations we conducted fact-finding training for postal investigators in 2002. To continue our focus on preventing sexual harassment and addressing employee complaints in that regard, we decided to send memos to every EAS and craft employee this fiscal year. A memo will be sent each quarter alternating between memos to EAS only and memos to all employees, EAS and craft. The memos to EAS employees will reiterate our obligation to take allegations of sexual harassment seriously; to conduct an investigation of allegations; and to undertake remedial measures when appropriate based upon the circumstances and results of the investigation. The memos to all employees, EAS and craft, will remind all employees of their obligations and rights. The first memo to EAS employees will be mailed in Quarter 3; the memo to all employees, EAS and craft, will be sent in Quarter 4.

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We disagree with the part of the recommendation to fully document detailed evidence of the actions taken to address complaints because this requires management in some instances to depart from the postal service investigatory protocol as set forth in the relevant publication and policy. Postal Service Publication 552 states, "some complaints can be resolved simply and directly between parties without the need for a formal written record." The actions of Northern Virginia and Richmond Districts are consistent with this policy.

Recommendation # 2

The Equal Employment Opportunity office notifies district management of all complaints of sexual harassment or inappropriate actions/comments.

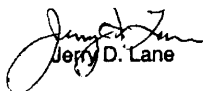
Response

We agree with the recommendation that the district Equal Employment Opportunity office should notify district management of all complaints of sexual harassment or inappropriate actions/comments; this is consistent with current policy in Capital Metro Operations. We will send a memo to all District Managers to reiterate the present policy by February 14, 2002.

We believe the overall quality of the report would be improved by the following.

1. Accurate use of data:
The first footnote of the draft states that \$154,750 was paid for two complaints that were not within the scope of your review. Additionally, our review of our records was unable to confirm the referenced expenditure.
2. Addressing and assigning responsibility to the appropriate organizational level:
Capital Metro Operations is complying with the requirements of postal policy to prevent sexual harassment and to correct sexually harassing behavior. The audit proposes changes to policy. Such a change in policy would be a national matter, not area, and need to be referred to postal headquarters.
3. Avoiding subjective assertions that are not supported or supportable within the context of the audit report:
The report states that complaints were not adequately addressed based upon requirements that extend beyond those currently required by postal policy.

Thank you for the opportunity to respond to the draft audit report.


Jerry D. Lane

cc: Murray Weatherall
Susan Ducheck