August 29, 2000

KENNETH C. WEAVER CHIEF POSTAL INSPECTOR

SUBJECT: Audit of the Postal Inspection Service Self-Referral Counseling Program (Report Number OV-AR-00-001)

This report presents the results of our audit of the Postal Inspection Service's Self-Referral Counseling Program (Project Number 00CA002OV000). Our objective was to evaluate the management and operation of the Inspection Service's Self-Referral Counseling Program.

We concluded that the management and operation of the Self-Referral Counseling Program was generally effective in supporting program objectives. However, a program contingency plan was not prepared until after the audit was initiated. The report contains no recommendations. Management provided comments to the report and stated that the audit supports their views regarding the benefits of the program and ensures that the administration of the program is consistent with good business practices. Management's comments, in their entirety, are included in an Appendix B of this report.

We appreciate the cooperation and courtesies provided by your staff during the audit. If you have any questions, please contact Dennis Riley, acting director, Oversight, or me at (703) 248-2300.

Debra D. Pettitt Acting Assistant Inspector General for Oversight and Business Evaluations

Attachment cc: James K. Belz John R. Gunnels

TABLE OF CONTENTS

Executive Summary	
Part I	
Introduction	1
Background Objective, Scope, and Methodology	1 2
Part II	
Audit Results	4
Self-Referral Counseling Program Audit Comment Management's Comments	4 5 5
Appendix A. Details of Audit Results	6
Appendix B. Management's Comments	8

EXECUTIVE SUMMARY

Introduction	This report presents the results of our audit of the Postal Inspection Service's Self-Referral Counseling Program (Project Number 00CA002OV000). Inspection Service management suggested this audit topic for inclusion in our annual audit plan.
Results in Brief	Our audit disclosed that the management and operation of the Self-Referral Counseling Program was generally effective in supporting program objectives. Specifically, Inspection Service management provided oversight of program operations while maintaining inspector confidentiality; management controls were sufficient to ensure correct payments to participating psychologists and the program coordinator; and inspectors using the program were generally pleased with it. In addition, the Self-Referral Counseling Program provided benefits not provided by Employee Assistance Programs at the Postal Service and other federal law enforcement agencies surveyed. Although the management and operation of the Self- Referral Counseling Program was generally effective, a program contingency plan was not prepared until after the audit was initiated.
Summary of Recommendations	This report contains no recommendations since the program coordinator submitted a program contingency plan to the Inspection Service coordinator and the deputy chief inspector for Administration during the course of the audit.
Management's Comments	Although the report contains no recommendations, the deputy chief inspector, Security and Technology, provided comments to the report. The deputy chief inspector identified that the audit supports management views regarding the benefits of the program and ensures that the administration of the program is consistent with good business practices. Management's comments, in their entirety, are included in Appendix B of this report.

Background The Self-Referral Counseling Program is a confidential counseling program through which postal inspectors can request and obtain counseling from preapproved clinical psychologists located throughout the country. The program was created to assist inspectors experiencing work-related stress that could impact work performance. Work-related stress includes marital and family problems, bereavement, supervisory and performance problems, alcohol abuse, and other similar issues. The purpose of the program is to provide therapy and not determine fitness for duty. The Self-Referral Counseling Program is designed to support postal inspectors. However, Inspection Service support personnel and postal police officers may participate in the program by requesting authorization from the deputy chief inspector for Administration. The program served 98 clients during fiscal year (FY) 1998 at a cost of \$75,352, and 81 clients during FY 1999 at a cost of \$79,934. Process The Inspection Service Manual, Section 149, July 30, 1999, governs the operation of the Self-Referral Counseling Program. Inspectors, as part of the program, are authorized to obtain therapy from approved state licensed clinical psychologists at Postal Service expense. All psychologists have experience working with law enforcement personnel and have undergone background and reference checks before being accepted into the program. An inspector contacts the program coordinator, a licensed police psychologist who is not an employee of the Inspection Service, to initiate the referral process. The program coordinator verifies that the inspector is a current employee of the Inspection Service, discusses the inspector's needs, and provides the inspector with a billing number to provide to the psychologist at the initial visit. The inspector selects a local psychologist from a listing of participating psychologists maintained at each division and domicile. Inspectors are authorized to receive up to ten hourly therapy sessions. The program coordinator and deputy chief inspector for Administration may authorize up to an additional ten sessions during a 12-month period.

INTRODUCTION

	Psychologists send invoices to the program coordinator who reviews, signs, and forwards them to the Bala Cynwyd Operations Support Group for payment. Operations Support Group personnel review the invoices, and reject or process the invoice for payment.
Program Responsibilities	The program coordinator assists inspectors with referrals, acts as a liaison between inspectors and program psychologists, updates referral sources, responds to complaints or concerns with the program, and coordinates program activities with the Inspection Service coordinator. Due to confidentiality requirements, the program coordinator is the only person who knows the identity of the inspector participating in the program other than the participating psychologist.
	The manager, Inspection Service Operations Support Group, Bala Cynwyd, Pennsylvania, is the Inspection Service coordinator for the program. The Inspection Service coordinator monitors program activities through coordination with the program coordinator and inspector surveys. The Inspection Service coordinator also reviews and approves program therapist invoices for payment.
Objective, Scope, and Methodology	Our objective was to evaluate the management and operation of the Inspection Service's Self-Referral Counseling Program. Specifically, we evaluated program management, management controls, and client satisfaction. We also compared the program to Employee Assistance Programs at the Postal Service and selected federal law enforcement agencies.
	To accomplish our objective, we reviewed documentation supporting provider payments for 20 randomly selected billing numbers for FY 1998 and 1999. We also reviewed documentation supporting payments to the program coordinator and program surveys returned by program participants during FY 1998 and 1999. We interviewed the deputy chief inspector for Administration, Inspection Service coordinator, and program coordinator. We also interviewed Employee Assistance Program officials at the U.S. Postal Service; Secret Service; Bureau of Alcohol, Tobacco and Firearms; and the Federal Bureau of Investigation. ¹

¹ Information provided by agency representatives was self-reported and was not independently verified.

We conducted the audit from February through August 2000 in accordance with generally accepted government auditing standards and included such tests of internal controls as were considered necessary. We discussed our conclusions and observations with appropriate management officials and included their comments, where appropriate.

AUDIT RESULTS

Self-Referral Counseling Program	The management and operation of the Self-Referral Counseling Program was generally effective in supporting program objectives. Specifically, Inspection Service management provided oversight of program operations while maintaining inspector confidentiality; management controls were sufficient to ensure correct payments to participating psychologists and the program coordinator; and inspectors using the program were generally pleased with it. In addition, the Self-Referral Counseling Program provided benefits not provided by Employee Assistance Programs at the Postal Service and other federal law enforcement agencies surveyed. Although the management and operation of the Self-Referral Counseling Program was generally effective, a program contingency plan was not prepared until after the audit was initiated. See Appendix for detailed results related to our review of program management, management controls, client satisfaction, and benefits offered by Employee Assistance Programs at the Postal Service and federal law enforcement agencies surveyed.
Contingency Plan	A program contingency plan, which explains the steps to be taken if the program coordinator was suddenly unable to continue in their role, was not prepared when the audit was initiated. We believe that a contingency plan is essential to ensure the continued operation of the program in the event that the program coordinator, who has significant responsibilities in ensuring the operation of the program, leaves the position. The absence of a written plan could have resulted in inspectors delayed entrance into the program. A delay in securing entrance to the program presents an increased risk to the Postal Service that inspectors are not receiving appropriate service. The program coordinator stated that he developed a program in the Western Region. However, neither the deputy chief inspector for Administration nor the Inspection Service coordinator was aware that a contingency plan existed.

Audit Comment	During the course of the audit, the program coordinator submitted a contingency plan, detailing the actions to be taken in the event the program coordinator was unable to continue in their role, to the Inspection Service coordinator and deputy chief inspector for Administration. We believe that this contingency plan adequately addresses the actions required to ensure continued program operation.
Management's Comments	Although the report contains no recommendations, the deputy chief inspector, Security and Technology, provided comments to the report. The deputy chief inspector expressed appreciation to Office of Inspector General for the review. The deputy chief inspector further identified that the audit supports management views regarding the benefits of the program and ensures that the administration of the program is consistent with good business practices. Management's comments, in their entirety, are included in Appendix B of this report.

APPENDIX A. DETAILS OF AUDIT RESULTS

Program Management. Inspection Service management provided oversight of program operations while maintaining inspector confidentiality. Specifically, the Inspection Service coordinator maintained frequent contact with the program coordinator to monitor program operations, payments, and client satisfaction. The Inspection Service coordinator and program coordinator discussed and resolved various program issues including requests for increases in rates made by practitioners. The Inspection Service coordinator also worked with the program coordinator to measure customer satisfaction with the program through client surveys. Once a year, the Inspection Service coordinator prepared and forwarded client surveys to the program coordinator, who forwarded them to program participants citing the billing number to maintain confidentiality. Program participants returned the completed surveys to the program coordinator, who provided the surveys to the Inspection Service coordinator, who provided the surveys to the Inspection Service coordinator, who provided the surveys to the Inspection Service coordinator, who provided the surveys to the Inspection Service coordinator, who provided the surveys to the Inspection Service coordinator, who provided the surveys to the Inspection Service coordinator, who provided the surveys to the Inspection Service coordinator, who provided the surveys to the Inspection Service coordinator for review.

Management Controls. Management controls were sufficient to ensure that psychologists were paid the agreed upon rate and were not paid for sessions in excess of the authorized number. Sufficient controls also existed to ensure psychologists were not paid for services not rendered and payments to the program coordinator were correct.

Program participants mailed their invoices to the program coordinator who verified that the billing rate was correct and that the number of sessions received did not exceed the authorized number. After this initial review, the program coordinator forwarded the invoices to the Inspection Service coordinator who reviewed and resolved any discrepancies in the billing rates or number of sessions noted by the program coordinator. Bala Cynwyd Operations Support Group staff also conducted an independent review of invoices to ensure the correct billing rate was used and the number of sessions attended did not exceed the maximum number of sessions allowed before the Inspection Service coordinator certified them for payment. We identified that Bala Cynwyd Operations Support Group staff rejected payments to psychologists in some instances because the number of visits exceeded the authorized number or the psychologists were charging an incorrect rate.

Sufficient controls also existed to ensure psychologists were not paid for services not rendered and payments to the program coordinator were correct. Specifically, the Inspection Service coordinator requested that inspectors participating in the program verify the number of visits they had with the psychologist in their responses to the client surveys. In addition, the program coordinator, based on a separate review of psychologist invoices, researched and resolved instances of excess billings. The Inspection Service coordinator and Bala Cynwyd Operations Support Group staff also reviewed payments to the program coordinator, who tracked their own time spent on the program, for reasonableness.

Client Satisfaction. Inspectors using the Self-Referral Counseling Program were generally pleased with the services provided. The results of the client surveys completed by inspectors using the program during FY 1998 and FY 1999 indicated that 70 of the 71 inspectors completing the surveys gave the program favorable numeric ratings. Some inspectors completing the surveys provided narrative comments in addition to the numeric ratings. An inspector who used the program during FY 1998 expressed appreciation for the program and identified that they found the program to be insightful and important to their personal and professional well being. Another inspector who used the program during FY 1999 responded that they benefited from their involvement in the program and would continue to benefit as they applied what they had learned.

Employee Assistance Programs. The Secret Service; Bureau of Alcohol, Tobacco, and Firearms; and Federal Bureau of Investigation do not have a program similar to the Inspection Service's Self-Referral Counseling Program. Rather, these agencies, like the Postal Service, have established Employee Assistance Programs that provide short-term counseling and assistance in locating outside resources for longer-term counseling, if required.

While postal inspectors can use the Postal Service's Employee Assistance Program, the Self-Referral Counseling Program provides benefits not provided by Employee Assistance Programs at the Postal Service or federal agencies surveyed. Specifically, the Self-Referral Counseling Program utilizes clinical psychologists who have experience counseling law enforcement personnel. The Employee Assistance Programs at the Postal Service and federal agencies surveyed are not required to utilize clinical psychologists with law enforcement experience. Rather, these programs may use licensed professional counselors who may or may not have experience counseling law enforcement personnel. In addition, postal inspectors can obtain up to 20 counseling sessions under the Self-Referral Counseling Program while the Postal Service's Employee Assistance Program provided up to 12 sessions. Employee Assistance Programs at the federal agencies surveyed provided from three to eight sessions. Finally, the Self-Referral Counseling Program provided postal inspectors an increased assurance of anonymity that may not have been achieved through the Postal Service's Employee Assistance Program.

APPENDIX B. MANAGEMENT'S COMMENTS



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UNITED STATES POSTAL INSPECTION SERVICE

DEPUTY CHIEF INSPECTOR - SECURITY/TECHNOLOGY

August 8, 2000

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Billy Sauls Assistant Inspector General For Oversight and Business Evaluations Office of the Inspector General

SUBJECT: Response of Draft Audit Report – Audit of the Postal Inspection Service Self-Referral Counseling Program (Report Number OV-AR-00-DRAFT)

Please express my appreciation to the members of the OIG's staff responsible for this review. Inspection Service management views the Self Referral Counseling Program as being beneficial to the Service, but more importantly to the inspectors who request these services. The review conducted not only supports this position, but ensures that the administration of this program is consistent with good business practices.

Thank you.

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