



November 2, 2007

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VICE PRESIDENT, SOUTHEAST AREA OPERATIONS

SUBJECT: Audit Report – The Postal Service’s Violence Prevention and Response Programs in Three Southeast Area Performance Clusters (Report Number HM-AR-08-002)

This report presents the results of the U.S. Postal Service Office of Inspector General’s (OIG) self-initiated audit of the Postal Service’s violence prevention and response programs in three Southeast Area Performance Clusters (PC) (Project Number 06YG044HM003). The Southeast 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 Central Florida, South Florida, and Suncoast 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 second 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 Central Florida, South Florida, and Suncoast 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, Southeast 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 13 recommendations to help the Southeast 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 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 all 13 recommendations and the actions taken or planned should correct the issues identified. Management's comments and our evaluation of these comments are included in the report.

Background

The Postal Service has long recognized the importance of ensuring the safety of its employees by creating and maintaining a work environment that is violence-free. In addition, the agency is obligated under the Occupational Safety and Health Administration (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 Central Florida, South Florida, and Suncoast 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.

Two of the three PCs did not consistently ensure that facilities had appropriate security safeguards in place and that employees complied with them. The Central Florida, South Florida, and Suncoast PC security coordinators stated they took corrective actions on the security and safety deficiencies identified at the three PCs in fiscal year (FY) 2006. However, the [REDACTED] and [REDACTED] coordinators did not maintain the documents that showed the actions taken and how the actions corrected the deficiencies. The [REDACTED] security coordinator did maintain documentation.

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

In FY 2007, the Southeast Area security coordinator took corrective action to ensure that documentation was maintained. 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 three PCs disseminated copies of their current local zero tolerance policy to all PC employees in FY 2006 through stand-up talks and new employee orientation classes. However, management could improve their procedures for posting their zero tolerance policy, which sometimes was not posted at all or was not signed by the current lead plant manager at some of the facilities we visited.

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.

Recommendations

We recommend the Vice President, Southeast Area Operations:

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

Workplace Violence Awareness Training Needed for Some Employees

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

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

The Postal Service Headquarters Employee Assistance Program (EAP)/Workplace Environment Improvement (WEI) Office established a web-based TAT Membership and Meeting Tool to ensure TAT core members receive the required training in accordance with the TAT Guide. Effective March 2007, each PC is required to timely update the information for their TAT core members.

Recommendations

We recommend the Vice President, Southeast Area Operations:

3. Notify the Central Florida, South Florida, and Suncoast Performance Cluster managers that workplace violence awareness training is a fiscal year

³ 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.

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

mandatory requirement, and it is their responsibility to ensure training occurs, preferably during non-peak operational periods.

4. Direct the Central Florida, South Florida, and Suncoast Performance Cluster managers to determine which managers, supervisors, and 204b supervisors have not received the 8-hour (one-time) workplace violence awareness training, and provide the training as soon as possible.
5. Instruct the Central Florida, South Florida, and Suncoast District managers to:
 - Remind Human Resources managers of their responsibility to conduct periodic reviews (at least quarterly)⁵ to determine if management has met the mandatory workplace violence awareness training requirements for all employees (including 204b supervisors) 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 workplace violence awareness training.

Strategies to Enforce Postal Service Policy Not Fully Implemented

The [REDACTED] 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; [REDACTED]. We identified 26⁶ incidents reported to the three TATs in FY 2006 and determined that 17 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 violent incidents. In addition, management needs to appropriately and immediately respond to potentially violent incidents. For example, VOE Survey quarterly reports for the three PCs indicate many employees were concerned they were working in an unsafe environment and could be victims of physical violence.

Recommendations

We recommend the Vice President, Southeast Area Operations:

6. Remind the [REDACTED] Performance Cluster managers of their responsibility to ensure threat assessment teams comply with the *Threat Assessment Team Guide* when responding to and resolving incidents of violent and inappropriate behavior.

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

⁶ We reviewed 10 Central Florida, 10 South Florida, and six Suncoast PC incidents.

7. Direct the Central Florida, South Florida, and Suncoast 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 [REDACTED] threat assessment teams 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 three 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, numbers of grievances and Equal Employment Opportunity (EEO) complaints, EAP referrals data, the number of assaults and credible threats, workers' compensation claims filed, and fitness-for-duty request logs to identify events that could escalate the potential for violence. However, the [REDACTED] HR 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. The [REDACTED].

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

In addition, we reviewed 41 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, Southeast Area Operations:

9. Direct the [REDACTED] 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 three TATs had the requisite number and type of team members. However, the TATs did not consistently conduct quarterly⁷ 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 web-based TAT Membership and Meeting Tool will ensure management conducts and documents TAT meetings, and disseminates meeting minutes in accordance with the TAT Guide. Effective March 2007, each PC is required to timely update the information for their TAT.

Recommendation

We recommend the Vice President, Southeast Area Operations, direct the Central Florida, South Florida, and Suncoast Performance Cluster managers to:

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

TAT Performance Measures

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

⁷ The Postal Service modified the TAT Guide in March 2007 to require meetings twice a quarter.

measures suggested in the TAT Guide may provide more useful information to identify areas for TAT improvement.

Recommendation

We recommend the Vice President, Southeast Area Operations, direct the Central Florida, South Florida, and Suncoast Performance Cluster managers to:

11. Implement controls to ensure threat assessment teams document 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 Central Florida, South Florida, and Suncoast PC and Southeast Area HR managers did not provide adequate oversight of the violence prevention and response programs. The PC managers did not ensure the three TATs implemented many of the required policies and procedures to reduce the potential for violence related to security, communication of policy, and the environment and culture. The PC and HR managers also did not ensure that TATs followed appropriate processes and documented performance measures.

In addition, the [REDACTED] did not ensure the three PCs fully implemented the workplace violence prevention program even though the OIG recommended improvements to the programs in these three PCs in August 1999 and September 2000.⁸

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 Central Florida, South Florida, and Suncoast 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.

⁸ *Review of the Violence Prevention Program in the Suncoast District and the Impact on Workplace Climate and Operations* (Report Number ER-AR-99-002, dated August 24, 1999); *Review of the Violence Prevention and Response Programs in the Central Florida District* (Report Number LB-AR-00-008, dated September 29, 2000); and *Review of the Violence Prevention and Response Programs in the South Florida District* (Report Number LB-AR-00-006, dated September 29, 2000).

Recommendations

We recommend the Vice President, Southeast Area Operations:

12. Implement an internal control to ensure Southeast 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.
13. Determine if the findings in this report exist in the remaining Southeast Area Performance Clusters – Alabama, Atlanta, Mississippi, North Florida, South Georgia, and Tennessee – and, where necessary, take action to ensure management implements adequate controls.

Management's Comments

Management did not specifically agree or disagree with the findings. Management agreed, however, to implement all 13 recommendations in the report and provided completion dates for their corrective actions taken or planned.⁹ For example, management provided a copy of a March 5, 2007, memorandum from the Southeast Area HR Manager which transmitted a self-audit checklist to all district HR managers (with a copy to the district managers) asking them to certify the level of compliance with 21 controls (policies and procedures) to reduce the potential for violence by March 30, 2007. Management also stated they have no basis for disagreement with the non-monetary impact. Management's comments, in their entirety, are included in Appendix I.

Evaluation of Management's Comments

Management's comments are responsive, and the actions taken or planned should correct the issues identified in the findings. In addition, the OIG considers management's March 5, 2007, memorandum sufficient documentation to close significant recommendations 3, 4, and 13.

The OIG considers recommendations 1, 2, 5, 7, 8, 9, 11, and 12 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.

⁹ Management's formal comments indicate their disagreement with recommendation 2 and did not include the dates of corrective actions taken or planned. However, a subsequent discussion with management resulted in their agreement with recommendation 2 and the dates of corrective actions taken or planned.

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 Aproveit

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APPENDIX A. ACRONYMS

ASAP	Area Security Assessment Program
ASM	Administrative Support Manual
EAP	Employee Assistance Program
EEO	Equal Employment Opportunity
FOIA	Freedom of Information Act
FY	Fiscal Year
HR	Human Resources
NTD	National Training Database
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
WEI	Workplace Environment Improvement
WIA	Workplace Improvement Analyst

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

M-01242

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JOINT STATEMENT ON VIOLENCE AND BEHAVIOR IN THE WORKPLACE

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

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

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

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

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

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

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

D.C. Nurses Association

Federation of Postal Police
Officers

National Association of Letter
Carriers

National Postal Mail Handlers
Union

United States Postal Service

Dated: February 14, 1992

National Association of Postal
Supervisors

National Association of Postmasters
of the United States

National League of Postmasters of
the United States

PLEASE POST ON BULLETIN BOARDS IN ALL INSTALLATIONS

APPENDIX C. OBJECTIVES, SCOPE, AND METHODOLOGY

The overall objective of this audit was to determine if the Postal Service's violence prevention and response programs in selected locations were effective in reducing the potential for violence. Specifically, we determined whether (1) the Central Florida, South Florida, and Suncoast 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.¹⁰

To evaluate the workplace violence prevention and response program in the Southeast Area, we judgmentally selected the Central Florida, South Florida, and Suncoast PCs from the nine PCs in the Southeast Area. We selected these PCs based on an analysis of seven workplace environment climate indicators for FYs 2004 through 2006.¹¹ 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 list¹² and whether the OIG conducted prior workplace environment audits in the PC. Finally, we reviewed the FY 2006 Area Security Assessment Program (ASAP) reviews to determine the deficiencies identified and if the PCs took actions to correct them.¹³

We interviewed the PCs' HR, Labor Relations, and Training managers; the Workplace Improvement Analyst (WIA); and the area's HR manager and analyst to determine whether (1) the selected PCs had implemented required controls to reduce the potential for violence and (2) Postal Service internal controls existed to provide adequate oversight of the program at the area and PC levels. We also reviewed the TAT 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 and action plans.
- VOE Vital Few List.¹⁴
- Attendance records for required workplace violence awareness training.
- TAT incident reports and responses.

¹⁰ We will address oversight at the headquarters level in a separate report.

¹¹ 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.

¹² Troubled worksites are facilities where evidence exists of an ongoing history of behavioral factors that remain unresolved at the PC and area levels.

¹³ 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.

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

- Newsletter articles and stand-up talks related to the zero tolerance policies and action plans.
- Numbers of grievances and EEO complaints.
- Numbers of assaults and credible threats.
- HR managers' and staff roles and responsibilities in the workplace violence prevention and response programs.

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

We conducted this performance audit from January through November 2007 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances.¹⁵ 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 15, 2007, and included their comments where appropriate.

¹⁵ 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

Three OIG reports stated required controls were not fully implemented to reduce the potential for violence in the Central Florida, South Florida, and Suncoast Districts. These reports are the *Review of the Violence Prevention Program in the Suncoast District and the Impact on Workplace Climate and Operations* (Report Number ER-AR-99-002, dated August 24, 1999); *Review of the Violence Prevention and Response Programs in the Central Florida District* (Report Number LB-AR-00-008, dated September 29, 2000); and *Review of the Violence Prevention and Response Programs in the South Florida District* (Report Number LB-AR-00-006, dated September 29, 2000.) The reports also stated the Central Florida and South Florida Districts generally complied with the TAT Guide when reacting to incidents of violence but they did not fully implement proactive strategies to reduce the potential for violence in the workplace. The Suncoast District report stated district officials did not implement an effective violence prevention and response program. Specifically, the district did not conduct annual physical security reviews; monitor and evaluate climate indicators; mandate required violence awareness training for managers, supervisors, and craft employees; and measure the TATs' performance. We recommended the Vice President, Southeast Area, direct the Central Florida, South Florida, and Suncoast District managers to ensure they implement controls to improve the effectiveness of the districts' violence prevention programs. Management did not concur with the recommendations. However, we believed the districts' planned or implemented actions were responsive.

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

APPENDIX E. CENTRAL FLORIDA, SOUTH FLORIDA, AND SUNCOAST PERFORMANCE CLUSTERS' CONDITIONS AND CAUSES RELATED TO AUDIT OBJECTIVES

Objective 1 – Determine if the PCs implemented required controls (policies and procedures) to reduce the potential for violence.					
1. Security Strategy – Ensure appropriate safeguards for employees, customers, and property.					
Condition	PCs may not have ensured appropriate security safeguards were in place and complied with at many facilities.	X	✓	X	
	<ul style="list-style-type: none"> PC and area security coordinators did not maintain documentation that showed how the security deficiencies identified in 228 FY 2006 ASAP reviews were corrected. For example, the reviews identified that in the Central Florida and Suncoast PCs some exterior doors/access points to facilities were not secured (seven deficiencies), and unauthorized access to some facilities were not challenged (15 deficiencies). 	X	✓	X	
Cause	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	X	
	<ul style="list-style-type: none"> The zero tolerance policy was not posted in four of the 12 facilities visited. The zero tolerance policy was not signed by the lead plant managers. 	✓	X	X	
	X	✓	✓	X	
Cause	<ul style="list-style-type: none"> WIA did not know why the policy was not posted in the district building, and did not know where it was supposed to be posted.¹⁶ WIA did not know why the policy was not posted in the district office and co-located processing and distribution center. WIA believed it was an oversight the lead plant manager's signature was not on the zero tolerance policy. HR manager believed the district manager's signature was sufficient. 			X	
				X	
					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 – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.				
Condition	Workplace violence awareness training needed for some employees.	X	X	X
	• HR managers ensured most employees (32,355) 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	X
Cause	HR manager believed all managers, supervisors, and 204b supervisors completed the required 8-hour course as part of the Associate Supervisor Program.	X		
	*NTD exception reports for 8-hour course identified all employees as non-bargaining (including secretaries, technicians, and other non-managers). This made it difficult to discern which managers, supervisors, and 204b supervisors had not received training.		X	
	*The NTD does not identify 204b supervisors separate from their bargaining employee identification.		X	X
	Management turnover. ¹⁷			X
	██████████ did not receive training because in FY 2006 █████ was a contract employee and the PC does not provide contractors with TAT training.			X
Condition	TATs did not fully implement violence prevention strategies to ensure incidents of violent and inappropriate behavior were fully addressed in accordance with the TAT Guide.	X	X	✓
	• 17 of the 26 incidents reported to the TATs in FY 2006 were not properly addressed, while nine were.	X	X	✓
	➢ 17 did not receive proper case management (including documenting the assessment of the risk level), ¹⁸ and were not monitored and tracked to ensure resolution.	X	X	✓
	➢ Two had insufficient (or no) documentation which prevented us from determining how they were addressed and resolved (15 did).	X	X	✓
	➢ Three had no documented risk abatement plans (14 did).	X	X	✓
	➢ Seven were not immediately and firmly responded to (10 were).	X	X	✓
	• Incident tracking logs not properly maintained to show when 19 of the 26 incidents were reported and resolved.	X	X	X
Cause	HR managers did not fully understand the importance of TAT responsibilities.	X	X	X
	• WIAs believed that despite findings on 17 incidents, TATs handled incidents appropriately. ¹⁹	X	X	
	• WIAs believed the incident tracking logs were properly maintained.	X	X	X

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

¹⁷ The Suncoast x █████ position vacancies impacted the TAT's ability to ensure compliance with training requirements.

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 manager used the number of assaults and credible threats, fitness-for-duty request log, and workers' compensation claims as climate indicators to identify and follow-up on events that could escalate the potential for violence.	✓		
	Some improvements are needed.	✓	X	X
	• HR managers did not maintain documentation on how they used 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	X
	TATs had the requisite number and type of team members required by the TAT Guide.	✓	✓	✓
Cause	██████████ relied on █████ to ensure quarterly meetings were conducted, and minutes were properly prepared and disseminated.		X	
	██████████ the TAT meeting twice a year was cost effective due to the number of team members.	X		
	██████████ to disseminate minutes to the lead plant manager. ²⁰	X		
	██████████ did not ensure the TAT conducted quarterly meetings, or properly prepared and disseminated meeting minutes to required TAT members.			X
Condition	Measures to gauge TATs' success were not documented and may not have been adequate.	X	X	X
	• TAT informally discussed their teams' performance.		✓	
	• TAT used informal discussions with team members and installation heads or managers where the incident was reported.	✓		✓
	• TATs did not document informal measurements.	X	X	X
Cause	██████████ informal measures accomplished the intended purpose.	X	X	
	██████████ did not know why TAT requirements were not followed.			X

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Objective 2 – Determine the adequacy of oversight of the workplace violence prevention program at the area and PC levels.

Condition	[REDACTED]			
		X	X	X
	<ul style="list-style-type: none">PC managers 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.PC managers did not ensure that appropriate TAT processes were followed and performance measures were documented.[REDACTED] HR manager did not ensure the three PCs fully implemented the program even though the OIG recommended improvements to the Central Florida, South Florida, and Suncoast programs in August 1999 and September 2000.	X	X	X
Cause	[REDACTED] relied on [REDACTED] to ensure compliance with the TAT Guide requirements. [REDACTED] did not know why the former district manager did not provide oversight. ²¹		X	X

21 [REDACTED]

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

Redacted

* [REDACTED]
[REDACTED]

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

Redacted

* [REDACTED]
[REDACTED]

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

Redacted

* [REDACTED]
[REDACTED]

APPENDIX I. MANAGEMENT'S COMMENTS

TERRY J. WILSON
VICE PRESIDENT, AREA OPERATIONS
SOUTHEAST AREA



October 12, 2007

MEMORANDUM FOR: Kim H. Stroud
Director, Audit Reporting
1735 North Lynn Street
Arlington VA 22209-2020

SUBJECT: HR-AR-08-DRAFT
Postal Service's Violence Prevention and Response
Programs (Central Florida, South Florida and Suncoast)

We have reviewed the subject draft report and offer the following comments in response to the recommendations:

1. *Direct the Central Florida, South Florida, and Suncoast Performance Cluster managers to implement an internal control to ensure current zero tolerance policies are properly posted in all facilities, at least annually.*

Management Response: We have provided each district with a copy of the FY 2007 Zero Tolerance Policy signed by the Southeast Area Vice President and have requested that each district certify that they have updated, published and posted this policy.

2. *Direct the [REDACTED] Performance Cluster managers to update their zero tolerance policy to include the lead plant managers' signature.*

Management Response: Current policy does not require senior district executives to sign the Zero Tolerance statement. We would like to keep it that way. This allows Installation Heads to show their commitment to the Zero Tolerance Policy.

3. *Notify the Central Florida, South Florida, and Suncoast Performance Cluster managers that workplace violence awareness training is a fiscal year mandatory requirement.*

Management Response: We will require new Threat Assessment Team core members receive the required training and new managers, supervisors and 204b's receive the 8-hour (one-time) workplace violence awareness training. See our response to Recommendation No. 4.

4. *Direct the Central Florida, South Florida, and Suncoast 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.*

Management Response: We agree with your recommendation. We have reviewed each district's training records and will provide training to all managers, supervisors and current 204b supervisors as soon as possible, during our non-peak operational periods.

225 N HUMPHREYS BLVD
MEMPHIS TN 38166-9100

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5. *Instruct the Central Florida, South Florida, and Suncoast District Managers to:*

- *Remind Human Resources managers of their responsibility to conduct periodic reviews (at least quarterly) to determine if management has met the mandatory workplace violence awareness training requirements for all employees (including 204b supervisors) and threat assessment team members.*
- *Implement a control to ensure Human Resources Managers conduct periodic reviews.*

Management Response: The Southeast Area agrees with implementing this recommendation. The Area HR Analyst will implement quarterly control measures to ensure managers and supervisors have received the training and that all Threat Assessment Team core members have received the 16-hour orientation training.

6. *Remind the Central Florida, South Florida, and Suncoast 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.*

Management Response: The Southeast Areas agrees that supporting documentation and appropriate case management are needed when responding to and resolving incidents of violent and inappropriate behavior.

7. *Direct the Central Florida, South Florida, and Suncoast Performance Cluster managers to implement controls to ensure district threat assessment teams comply with the Threat Assessment Team Guide when responding to and assessing reports of potentially violent situations and inappropriate behavior.*

Management Response: We agree with this recommendation as indicated in our response to Recommendation No. 6.

8. *Direct the [REDACTED] 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.*

Management Response: We agree with this recommendation. We will request both districts provide our office notification that those incidents with insufficient supporting documentation were resolved in accordance with the Threat Assessment Team Guide.

9. *Direct the [REDACTED] Performance Cluster Managers to ensure the Threat Assessment Teams document their evaluation of climate indicators to identify trends, and workplace environments where events could escalate the potential for violence.*

Management Response: The Southeast Area has instructed the districts to use other data groups in addition to the VOE Survey as a gauge of the workplace environment.

10. *Remind the Human Resources managers of their responsibilities to conduct meetings, document the minutes and disseminate the minutes to the appropriate Threat Assessment Team members.*

Management Response: Headquarters has implemented a tracking and compliance website for each district to document and certify quarterly meetings, disseminate minutes and certify the type of team members. The Area HR Analyst will monitor this website for compliance.

11. *Implement controls to ensure threat assessment teams document 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 areas for improvement.*

-3-

Management Response: The Southeast Area will implement an internal control to ensure proper documentation and follow-up.

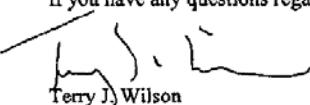
12. *Implement an internal control to ensure Southeast Area Performance Cluster managers provide adequate oversight of their threat assessment teams to improve the effectiveness of the violence prevention and response programs.*

Management Response: We agree with this recommendation. In March of this year, we submitted your Audit Checklist to all district managers, Human Resources, and asked that they review the checklist to ensure they were in compliance. We will implement quarterly certifications to ensure we maintain area oversight and have controls in place to maintain a safe work environment for all employees.

13. *Determine if the findings in this report exist in the remaining Southeast Area Performance Clusters - Alabama, Atlanta, Mississippi, North Florida, South Georgia, and Tennessee, and where necessary, take action to ensure adequate controls are implemented.*

Management Response: We agree with this recommendation. See our response to Recommendation No. 12.

If you have any questions regarding our response, please let me know.



Terry J. Wilson

Attachments

**The Postal Service's Violence Prevention and
Response Programs in Three Southeast Area
Performance Clusters**

HM-AR-08-002

LEONARD L. BROWN
Manager, Human Resources
SOUTHEAST AREA



March 5, 2007

MEMORANDUM FOR: Manager, Human Resources
SUBJECT: Violence and Prevention Response Program
Self-Audit

On September 13, 2006, the OIG met with Headquarters announcing its plan to conduct an Audit on Violence Prevention and Response in FY 2007. On January 24-26, 2007, the OIG conducted Audits in the Southeast Area to include Suncoast, Central Florida and South Florida Districts.

The purpose of the audits is to determine whether our violence and prevention response program is effective in reducing the potential for violence. The audits focused on implementation of required controls (policies and procedures) to reduce the potential for violence. Additional information on previous Audits can be found by accessing the OIG website at http://www.uspsoig.gov/audit_reports.cfm (type in 'Violence Prevention' on the Search line to view all Southeast Area previous Audit reports).

Although this year's initial audits focused on three of our nine districts, we would like to ensure that all districts are in compliance with the OIG Audit Checklist. Attached is the OIG (Revised) Audit Checklist to use as a guide in conducting a Self-Audit. Upon completion, please provide this office with copies of updated policy statements and guidelines that addresses violence in the workplace that have been implemented in your Cluster to include but not limited to:

- Zero Tolerance Policy
- Action Plan for Threats and Assaults and Workplace Incidents
- Incident Report Forms
- New Employee Orientation Package
- Other (Newsletter, Safety Talks, Posters, etc.)

A Statement of Completion is also included for your signature – deadline for completion is March 30, 2007. Please direct any questions to [REDACTED]

Employees have a right to perform his or her assigned duties in an atmosphere free of threats and assaults. We are committed to ensuring a safe working environment for all employees.

A handwritten signature of Leonard Brown in black ink.

Leonard Brown

Attachments

cc: District Managers

225 N HUMPHREYS BOULEVARD
MEMPHIS TN 38166-0640
901-747-7200
Fax: 901-747-7206

Audit of the Postal Service's Workplace Violence Prevention and
Response Program in Selected Locations
FY 2007 District Office Self-Audit (Revised) Checklist

District Human Resource Manager: Please conduct a Self-Audit to ensure that you have the following information and supporting documentation on file in your District. Please fill in the blanks for Item 3 and 21. Upon completion of the Self-Audit Checklist, please return the Checklist and complete a Certificate of Completion Statement to the Area Office, Attn.: [REDACTED] NLT March 30, 2007. Thank you.

1. District's zero tolerance policy statement and action plan.
2. District's policies and procedures used to reduce the potential for violence in the workplace.
3. The total number of credible threats and assaults reported to the Threat Assessment Team (TAT and Inspection Service during FY 2006 _____. YTD FY 2007 _____.
4. The TAT surveys, incident reports and post-analysis for FY 2006.
5. Copies of TAT case files for incidents reported to and responded by the TAT.
6. District's methods of communicating violence prevention awareness information to employees such as magazines, newsletters, pay envelope inserts, copy of safety talks, posters, direct mailings.
7. District's policy and procedures for how employees should report incidents of violence or potential violent situations.
8. Process and supporting documentation of how the district immediately and firmly responds to incidents of violence or potential violent situations.
9. Copy of the district's new employee orientation package with documentation/agenda to support that violence prevention awareness training is included in the training.
10. Names and titles of the district's TAT members during FY 2006. Please update website.
11. Climate indicators used to proactively monitor the district and facilities workplace climate.
12. Copies of FY 2006/2007 YTD minutes of staff meetings, conferences, or reports to support the district's methods of monitoring and enforcing policies and procedures to reduce violence in the workplace.
13. Fiscal Year 2006 reports used to monitor and identify trends in the workplace climate.
14. Total number of EEO complaints during FY 2004, 2005 and 2006.
15. Total number of grievances during FY 2004, 2005 and 2006.
16. Total number of EAP referrals during FY 2004, 2005 and 2006. *Area will forward information in separate email.*
17. Copy of a recent flash report.

19. List of the district's supervisors, managers, and postmasters names and titles (including 204b) during FY 2006 and YTD FY2007.

20. FY 2006 TAT core members training record to support that all core members have received the required violence prevention training course number 22203-00.

21. Please complete the following chart and ensure the supporting documentation is on file.

District's TAT and FY 06 Training Requirements (PLEASE ENSURE SUPPORTING DOCUMENTATION FOR THE TOTALS IS ON FILE)		
	Total	Total
Total number of <u>ALL employees</u> assigned to the district during FY 2006.		Total number of all employees who completed the FY 2006, 1 hour mandatory workplace violence awareness training course # 18201-21 .
Total number of <u>bargaining employees</u> assigned to the district during FY 2006.		Total number of bargaining employees who completed the FY 2006, 1 hour mandatory workplace violence awareness training course # 18201-21 .
Total number of <u>non-bargaining employees</u> assigned to the district during FY 2006.		Total number of non-bargaining employees who completed the FY 2006 additional 1 hour workplace violence awareness training course # 18201-24 .
Total number of <u>managers AND supervisors</u> assigned to the district during FY 2006.		Total number of managers and supervisors during FY 2006 who completed the one-time TAT workplace violence awareness training course #21558-00 .
Total number of <u>204b</u> assigned to the district during FY 2006.		Total number of 204b during FY 2006 that completed the TAT workplace violence awareness training course #21558-00 .
Total number of <u>new employees</u> assigned to the district in FY 2006.		Total number of <u>new employees</u> during FY 2006 that received workplace violence awareness training during their new employee's orientation.

**Workplace Violence Prevention and Response Program
Office of Inspector General
Self-Audit Checklist Certification**

District: _____ Manager, HR: _____

I certify that I have reviewed and completed the Self-Audit Checklist and found that we are in compliance on all twenty-one items. (If not in compliance, please indicate Item Number and Action Plan/date you will be in compliance.)

Completion Date: _____ / _____ / _____
Month Day Year

Forward to [REDACTED]

Last updated: 3/5/2007