



May 2, 2008

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VICE PRESIDENT, LABOR RELATIONS

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IMPROVEMENT PROGRAMS

SUBJECT: Audit Report – Violence Prevention and Response Programs in Selected  
Locations (Report Number HM-AR-08-006)

This report presents the summary results of the U.S. Postal Service Office of Inspector General's (OIG) self-initiated audits of the U.S. Postal Service's violence prevention and response programs in five areas and 15 performance clusters (PCs) (Project Number 08YG011HM000).

Our overall objective was to determine if the violence prevention and response programs in the 15 judgmentally selected PCs shown in Table 1 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 programs at the headquarters, area, and PC levels was adequate to ensure compliance with these controls.

**Table 1: Judgmentally Selected Locations**

<b>Capital Metro Area</b>	<b>Northeast Area</b>	<b>Pacific Area</b>	<b>Southeast Area</b>	<b>Southwest Area</b>
<b>1. Capital</b> <b>2. Greater South Carolina</b> <b>3. Richmond</b>	<b>4. Albany</b> <b>5. Boston</b> <b>6. Massachusetts</b> <b>7. New Hampshire/Vermont</b>	<b>8. Sacramento</b> <b>9. San Diego</b>	<b>10. Central Florida</b> <b>11. South Florida</b> <b>12. Suncoast</b>	<b>13. Albuquerque</b> <b>14. Dallas</b> <b>15. Fort Worth</b>

This is the final report in a series of six reports on the violence prevention and response programs. This report summarizes the conditions reported in the 15 PCs, management's actions to correct the conditions, issues identified with nationwide impact, and the level of oversight of the workplace violence prevention programs at the headquarters level.

We concluded that all 15 PCs established threat assessment teams (TATs) and took many positive steps to reduce the potential for violence such as conducting climate assessments and Voice of the Employee (VOE) Survey<sup>1</sup> 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. In addition, headquarters, area, and district personnel did not provide adequate oversight of the violence prevention and response programs to ensure compliance with policies and procedures. Although we cannot state with certainty that following policies and procedures will prevent violence in the workplace, compliance with them can provide management with valuable information about the existing workplace climate. Management can then use this information to assess actions needed to reduce the potential for violence.

We issued reports to five area vice presidents and made 69 recommendations to assist the areas, the 15 PCs, and their TATs with improving the effectiveness of the violence prevention and response programs. Management's comments to the recommendations were responsive and the corrective actions should resolve the issues identified.

This report includes four recommendations to assist the Vice President, Labor Relations, and the Manager, Contract Administration National Postal Mail Handlers Union and Employee Assistance Program/Workplace Environment Improvement (EAP/WEI) Programs, to further improve the workplace violence prevention and response programs. Implementation of these recommendations should also improve the safety and security of 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 four recommendations, and the actions taken or planned should correct the issues identified. Management also stated they were concerned that the review's objective was flawed and inconsistent with workplace violence research. 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:

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<sup>1</sup> 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 workplace.

- 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 (TAT Guide)*<sup>2</sup> requires TATs to assess and respond to violent and potentially violent situations. The guide outlines the following six organizational strategies to enhance the development of TATs and reduce violence: (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.

The Postal Service Headquarters EAP/WEI Programs Office provides oversight of the Postal Service's Workplace Violence Prevention and Response Programs and TAT processes both at headquarters and in the field. The EAP/WEI Programs Office function also includes developing the workplace environment manager and analyst roles at the area and PC levels and communicating policies and procedures to improve the workplace environment.

This audit reviewed implementation of required controls related to three of the six organizational strategies for reducing workplace violence — security, communication of policy, and environment and culture — and oversight of the violence prevention and response programs at the headquarters, area, and PC levels.

### **Objectives, Scope, and Methodology**

See [Appendix C](#) for details on our objectives, scope, and methodology.

### **Prior Audit Coverage**

See [Appendix D](#) for a list of prior audit reports.

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<sup>2</sup> Publication 108, dated March 2007.

## Results

The following summarizes our findings and recommendations regarding the 15 PCs' violence prevention and response programs and headquarters, area, and PC oversight. (See [Appendix E](#) for details regarding our findings.)

### **Security Strategy – Ensure appropriate safeguards for employees, customers, and property.**

Fourteen of the 15 PCs may not have ensured appropriate safeguards for employees, customers, and property. Five of the 14 PCs did not consistently ensure appropriate security safeguards because management did not establish consolidated standard operating procedures and guidance, implement appropriate internal and management controls, and require installation heads to certify they had corrected deficiencies. Our March and May 2007 reports regarding these five PCs disclosed that management needed to make improvements to protect employees, customers, the mail, and critical assets.<sup>3</sup> The area offices took corrective actions prior to and after issuance of our reports.

Nine of the PCs may not have ensured appropriate security safeguards were in place and complied with at many facilities. The nine PC security coordinators stated they took corrective actions on the security and safety deficiencies identified in fiscal year (FY) 2006 Area Security Assessment Program (ASAP) reviews,<sup>4</sup> however, they did not maintain documentation regarding the actions taken or how the actions corrected the deficiencies. This occurred because management did not require installation heads to certify they had corrected deficiencies. In FY 2007, the nine area security coordinators took corrective action to ensure documentation was maintained.

Appropriate security safeguards assist in preventing violence in the workplace. One such safeguard is preventing unauthorized individuals from gaining access to Postal Service facilities by securing doors. The FY 2006 VOE Survey results for the 15 PCs indicate that numerous employees<sup>5</sup> were concerned that unauthorized individuals could gain access to facilities in their PCs.

We are not making further recommendations since management's actions addressed the security issues.

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<sup>3</sup> *Postal Service Security Controls and Processes for the Capital Metro Area* (Report Number SA-AR-07-002, dated March 30, 2007) and *Postal Service Security Controls and Processes for the Pacific Area* (Report Number SA-AR-07-003, dated May 9, 2007).

<sup>4</sup> 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.

<sup>5</sup> Of the 78,923 employees that responded to the survey, 15,663 responded negatively to the statement that access to their building is allowed through a system or procedure that keeps unauthorized individuals from entering.

## **Communication of Policy Strategy – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.**

### Local Zero Tolerance Policy Postings Could be Improved

The 15 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 the zero tolerance policy, which sometimes was not posted at all, was not visible, or was not signed by the lead plant managers at some of the facilities we visited.

Human Resources (HR) managers provided various reasons for why the policies were not properly posted, including assertions that it was an oversight or that they were not aware that lead plant managers' signatures were required on the policy.

Properly posting the zero tolerance policy in all facilities was a local requirement at all 15 PCs, based on the TAT Guide, which allows PCs to disseminate information through a number of communication methods. We agree that posting the current zero tolerance policy may reduce the potential for violence in the workplace because it makes important information available on the workroom floor, where employees may need it most. In addition, while the TAT Guide does not specifically state that both PC managers must sign the policy statement, it does require the commitment of both managers to the policy, and provides two sample policy statements that indicate both managers should sign it. When both PC managers sign the zero tolerance policy, it reaffirms to all employees the managers' commitment to a violence-free workplace.

In response to our recommendations, all five area vice presidents implemented internal controls requiring all district managers to submit an annual written certification to their respective area vice presidents that zero tolerance policies are posted, visible, and updated in all facilities.

### Workplace Violence Awareness Training Needed for Some Employees

The 15 PC HR managers ensured most employees received the FY 2006 WEI training that is mandatory for all Postal Service employees. Thirteen of the 15 PC HR managers also ensured all TAT core members<sup>6</sup> received the required 2-day TAT orientation class training; however, two did not. In addition, the 15 PC HR managers did not ensure all managers, supervisors, and 204b supervisors<sup>7</sup> received the required 8-hour (one-time) workplace violence awareness training.

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<sup>6</sup> At the time of our review, TAT core members included the HR manager or designee, labor relations manager, medical director or occupational health nurse administrator, district manager or designee, and lead plant manager or designee.

<sup>7</sup> A 204b supervisor is a bargaining employee detailed to an acting supervisor position.

HR managers provided a number of reasons why the required training was not provided:

- Training was cancelled due to operational needs.
- HR managers were not aware of the 8-hour training requirement because it did not appear on the headquarters' list of FY 2006 mandatory training requirements.
- The National Training Database (NTD) exception reports for the 8-hour course did not identify which non-bargaining employees were supervisors or managers.<sup>8</sup>
- The NTD did not identify bargaining employees detailed to 204b supervisor positions.

We confirmed with a Headquarters Training Development Specialist<sup>9</sup> that the headquarters list of FY 2006 mandatory training represents annual training requirements and, therefore, the 8-hour course did not appear. The specialist stated that the TAT Guide communicates the requirement for the 8-hour course to HR managers.

We also verified that the NTD exception report for the 8-hour course does not identify which non-bargaining employees are supervisors or managers. However, HR managers could use the NTD executive administrative service report to identify the managers and supervisors who have not completed the one-time course.

We further verified that the NTD does not identify 204b supervisors and management manually tracks their training to ensure it is completed as required. This is because the NTD identifies employees by their occupational code and there is no occupational code for the 204b supervisor position.

According to the EAP/WEI Programs Manager, her office is re-evaluating the requirement that all 204b supervisors receive the 8-hour training. She explained that management does not believe it is a good business decision to require 204b supervisors detailed for short periods (a week or less) to complete the training. She also stated the 8-hour training is incorporated into the Associate Supervisors Program (ASP)<sup>10</sup> to ensure supervisors receive the training and policy requires that all new supervisors attend the ASP.

Postal Service employees who do not receive the required workplace violence awareness training may not effectively recognize, prevent, and respond to violent and

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<sup>8</sup> The non-bargaining employee category also includes secretaries, technicians, and other non-managers who are not required to take the 8-hour training.

<sup>9</sup> The Headquarters Training Development Specialist works for the Vice President, Employee Development and Diversity, who is responsible for disseminating employee annual training requirements to the areas and PCs.

<sup>10</sup> The ASP is a 16-week program used to attract, select, and train the best possible candidates for first-line supervisory positions. The program provides the trainees with the critical knowledge and skills necessary to become highly effective Postal Service leaders.

potentially violent situations. In addition, TAT members who are not adequately trained may not effectively establish or administer violence prevention and response programs to reduce the risk of violence in the workplace.

We believe 204b supervisors detailed for extended periods (more than a week) or frequently over time would benefit from training that includes communication skills and how to identify potentially threatening situations and behavioral warning signs of at-risk employees. Management could give a 204b supervisor detailed for a shorter period (a week or less) modified training or instructions on responding to threatening situations.

In response to our recommendations, all five area vice presidents directed their PCs to ensure all employees completed the required workplace violence awareness training. For example, the Capital Metro Area Vice President directed district managers to identify all managers, supervisors, and 204b supervisors and ensure they took the 8-hour course. The Southwest Area district managers were directed to conduct quarterly periodic reviews to ensure mandatory training is received.

### **Corrective Actions**

In November 2006, the Postal Service Headquarters EAP/WEI Programs 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 Manager, Contract Administration National Postal Mail Handlers Union and Employee Assistance Program/Workplace Environment Improvement Programs:

1. Instruct all area and performance cluster Human Resources managers to use the National Training Database Executive Administrative Service Report to identify supervisors and managers who have not received the 8-hour (one-time) workplace violence awareness training.

We also recommend the Vice President, Labor Relations:

2. Ensure 204b supervisors detailed for extended periods (more than a week) or frequently detailed over time receive workplace violence awareness training on communications skills, how to identify potentially threatening situations, and behavioral warning signs of at-risk employees. Management could modify training for 204b supervisors detailed for shorter periods (a week or less) to include written instructions or a point paper on how to respond to threatening situations.

3. Coordinate with the Vice Presidents, Employee Development and Diversity, and Employee Resource Management to determine the most efficient way for area and performance cluster Human Resources managers to identify 204b supervisors and their completion of workplace violence awareness training or other mandatory training required for their position.<sup>11</sup>

### Strategies to Enforce Postal Service Policy Not Fully Implemented

Two of the 15 TATs fully implemented violence prevention strategies to ensure incidents of violent and inappropriate behavior were fully addressed in accordance with the TAT Guide; however, 13 did not. This occurred because HR managers did not fully understand the importance of TAT responsibilities. For example, the incidents reported to one TAT were not documented and may not have been addressed. Other HR managers believed that despite the findings on the 123 incidents, the TAT handled the incidents appropriately. In addition, one HR manager believed the TAT requirement to monitor and track incidents to ensure resolution was a suggestion.

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.

In response to our recommendations, all five area vice presidents implemented internal controls to ensure TATs comply with the TAT Guide when responding to and assessing reports of potentially violent situations and inappropriate behavior. For example, the Southeast Area developed a checklist for district HR managers to certify the level of compliance with 21 controls (policies and procedures) to reduce the potential for violence. The Northeast Area required each PC to annually certify that their TAT is conducting business in accordance with the TAT 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

All 15 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 identified events that could escalate the potential for violence by monitoring and evaluating VOE Survey scores, numbers of grievances, Equal Employment Opportunity (EEO) complaints, EAP referral data, and the number of assaults and credible threats. However, 14 of the 15 HR managers did not document how (or how often) they monitored and evaluated these climate

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<sup>11</sup> According to the Headquarters Training Development Specialist, the Postal Service is currently designing SAP to track employee training and there may be an opportunity to include an identifier for 204b supervisors.

indicators, other than their quarterly monitoring and evaluation of the VOE Survey results (one PC did). This occurred because the managers considered evaluations of the VOE Survey results sufficient documentation of the workplace climate indicators.

Effective monitoring can help 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, our review of 139 complaints the OIG Hotline received during FY 2006 indicates that some employees at the 15 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.

In response to our recommendations, all five area vice presidents required that PC managers ensure TATs 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

Thirteen of the 15 PC TATs had the requisite number and type of team members; however, two did not. This occurred because the HR managers were not aware of the TAT Guide requirement. In addition, 13 of the 15 TATs did not consistently conduct quarterly<sup>12</sup> meetings, properly prepare meeting minutes, and disseminate minutes to the required TAT members (also required by the TAT Guide), while two did. HR managers told us they believed the informal TAT meetings held periodically throughout the year met the requirement, or they were not knowledgeable of some of the TAT responsibilities and how the team should operate.

There is increased risk that TATs will not achieve their primary mission of preventing workplace violence when they do not conduct meetings regularly and properly document the meeting information.

In response to our recommendations, all five area vice presidents reminded district managers of their responsibility to conduct meetings and properly document and disseminate the minutes to the appropriate TAT members.

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<sup>12</sup> The Postal Service modified the TAT Guide in March 2007 to require meetings twice a quarter.

## **Corrective Actions**

The TAT Membership and Meeting Tool the Headquarters EAP/WEI Programs Office implemented in November 2006 should help to ensure that management conducts and documents TAT meetings and disseminates meeting minutes in accordance with the TAT Guide. Further, effective March 2007, each PC is required to timely update the information for their TAT.

### TAT Performance Measures

Fourteen of the 15 HR managers stated they implemented performance measures such as verbal feedback from employees, informal TAT discussions, and surveys to gauge whether the TATs were successful or needed to change their processes. However, 14 HR managers did not document the measures they used and those measures may not have been adequate. One HR manager did not implement any performance measures.

TATs cannot provide assurance that their efforts to prevent violent incidents in the workplace are successful or whether they need improvement when they do not document these efforts. In addition, using the primary measures suggested in the TAT Guide may provide more useful information to identify areas for TAT improvement.

In response to our recommendations, all five area vice presidents agreed to implement controls to ensure the TATs document the processes used to measure their performance and ensure the measures used are adequate for gauging their success and identifying areas for improvement.

## **Oversight of the Workplace Violence Prevention Program**

### Area and PC Oversight

Our review of TAT activities in the 15 PCs indicated the five area vice presidents and PC and HR managers did not provide adequate oversight of the workplace violence prevention and response programs. The area PC and HR managers did not ensure the 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 area PC and HR managers also did not ensure that TATs followed appropriate processes and documented performance measures. Most of the area HR managers stated they relied on the PC managers, and the PC managers stated they relied on the PC HR managers to ensure compliance with the TAT Guide requirements.

In addition, six former area HR managers did not ensure their PCs fully implemented the workplace violence prevention programs even though the OIG recommended improvements to the programs in 1999 and 2000. (See [Appendix D](#) for a list of these audit reports.)

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.

In response to our recommendations, all five area vice presidents required annual certifications from district managers, confirming that TATs are conducting business in accordance with the TAT Guide.

### **Recommendation**

We recommend the Manager, Contract Administration National Postal Mail Handlers Union and Employee Assistance Program/Workplace Environment Improvement Programs:

4. Determine if the findings related to the five areas and 15 performance clusters exist in the remaining Postal Service Areas of Operations – Eastern, Great Lakes, New York Metro, and Western – and their performance clusters, and where necessary, take action to ensure management implements adequate controls.

### **Headquarters Oversight**

The Headquarters EAP/WEI Programs Office did not provide adequate oversight of the area and district workplace violence prevention and response programs to ensure compliance with policies and procedures. The activities of the 15 TATs were not monitored and TAT processes were not reviewed to determine compliance with the TAT Guide, and whether the processes were effective or needed improvement. The transition of the Headquarters EAP/WEI Programs Office from the Vice President, Employee Resource Management, to the Vice President, Labor Relations, in May 2005<sup>13</sup> and a change in EAP/WEI Programs managers in FY 2007 may have contributed to a reliance on the areas and PCs to provide oversight of the programs. For example, the Headquarters EAP/WEI Programs managers (former and current) needed time to identify the specific violence prevention and response program areas needing improvement and oversight.

However, since the start of our audit work in October 2006, the EAP/WEI Programs Office implemented the following initiatives to provide oversight and to improve the violence prevention and response programs:

- As previously stated, in November 2006, a web-based TAT Membership and Meeting Tool was established to ensure TAT core members receive required workplace violence training and to ensure that management conducts and documents TAT meetings and disseminates meeting minutes in accordance with

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<sup>13</sup> In May 2005, the Manager, Contract Administration National Postal Mail Handlers Union, assumed the added responsibility for the EAP/WEI Programs Office.

the TAT Guide. Beginning in March 2007, each PC was also required to timely update information on their TAT core members.

- In December 2006, the Postal Service established a National Committee on Workplace Violence Prevention<sup>14</sup> to oversee the violence prevention and response programs and enhance the policies and procedures that guide the programs.
- In March 2007, the Postal Service updated the TAT Guide with new information and compliance measures for the TATs.
- In October 2007, the Postal Service created workplace environment manager positions at the nine area offices and the PC workplace environment analysts now report to the area workplace environment managers. The agency made these changes so areas could monitor the PCs' compliance with the violence prevention and response programs and share best practices.
- In FY 2008, management implemented an online training course for interim and new TAT members to take during the first 30 days of their TAT assignment. The intent of this course is to provide immediate training to TAT core members while they are waiting for the next available 2-day orientation training.

The internal controls outlined above should provide sufficient headquarters oversight of TAT activities and improve the workplace violence prevention and response programs at the area and PC levels. This oversight should also help ensure the TAT teams are effective in comprehensively implementing the Postal Service's workplace violence prevention program strategies to reduce the potential for violence. As a result, we have no additional recommendations regarding headquarters oversight.

### Management's Comments

Management concurred with all four recommendations and provided a description of planned actions and implementation dates. Management also stated they were concerned that the review's objective to determine if violence prevention and response programs were effective to reduce the potential for violence was flawed and inconsistent with workplace violence research. Management stated that the objective should be consistent with the activities and compliance measures of the auditors. Management further stated that the objective in the OIG's previous violence prevention work, to determine if districts implemented violence prevention and response program policy, was more reflective of the activities reviewed in this audit.<sup>15</sup> Management's comments, in their entirety, are included in [Appendix F](#).

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<sup>14</sup> The committee members include 18 area and/or district employees and seven Headquarters EAP/WEI Programs Office employees. In addition, involvement from the Postal Inspection Service and outside professionals is solicited. The EAP/WEI Programs Manager appoints a committee chairperson.

<sup>15</sup> *National Capping Report on the Postal Service Violence Prevention and Response Programs* (Report Number LB-AR-01-020, dated August 23, 2001).

## Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations and management's corrective actions should resolve the issues identified in the report. We do not agree that the review's objective was flawed, inconsistent with workplace violence research, or dissimilar from previous OIG work. The objectives in this and the previous reviews were based on the Postal Service's criteria for reducing workplace violence. Specifically, the Postal Service's TAT Guide states the most effective way to respond to the problem of violence in the workplace is to develop strategies to prevent it. Our objective in this review involved assessing management's strategies to reduce the potential for such violence. Specifically, we reviewed (1) the PCs' implementation of required controls (policies and procedures) to reduce the potential for violence and (2) oversight of the workplace violence prevention programs at the headquarters, area, and PC levels. Assessing these strategies logically gives insight into the Postal Service's overall effectiveness in reducing the potential for such violence. Our findings that managers and TATs did not implement many required policies and procedures and that personnel did not provide adequate oversight to ensure compliance, led us to conclude that the violence prevention and response programs may not be fully effective in reducing the potential for violence. Finally, our work was not an academic research project, but rather an audit in compliance with Government Accountability Office standards for performance audits. As such, our audit objective was not intended to mirror what may be used in academic research.

The OIG considers recommendations 1 through 4 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 or need additional information, please contact Chris Nicoloff, Director, Human Capital, or me at (703) 248-2100.

E-Signed by Darrell E. Benjamin,   
VERIFY authenticity with ApproveIt

Darrell E. Benjamin, Jr.  
Deputy Assistant Inspector General  
for Support Operations

### Attachments

cc: Mary Anne Gibbons  
Susan M. LaChance  
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**APPENDIX A: ACRONYMS**

ASAP	Area Security Assessment Program
ASP	Associate Supervisor 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
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
WEI	Workplace Environment Improvement

**APPENDIX B: JOINT STATEMENT ON VIOLENCE AND  
BEHAVIOR IN THE WORKPLACE**

M-01242

POSTAL BULLETIN

21811, 3-19-92, Page 3



**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

National Association of Postal Supervisors

National Association of Postmasters of the United States

National League of Postmasters of the United States

National Rural Letter Carriers Association

Dated: February 14, 1992

**PLEASE POST ON BULLETIN BOARDS IN ALL INSTALLATIONS**

## APPENDIX C: OBJECTIVES, SCOPE, AND METHODOLOGY

The overall 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 PCs implemented required controls (policies and procedures) to reduce the potential for violence and (2) the level of oversight of the workplace violence prevention programs at the headquarters, area, and PC levels was adequate to ensure compliance with these controls.

To evaluate the workplace violence prevention and response programs in selected locations, we judgmentally selected five of the nine Postal Service areas of operation and 15 of the 40 PCs located in these areas.<sup>16</sup> We selected these areas and PCs based on an analysis of seven workplace environment climate indicators for FYs 2004 through 2006.<sup>17</sup> 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 list<sup>18</sup> and whether the OIG conducted prior workplace environment audits in the PC. We also included PCs where the OIG's Inspection Service and Facilities Directorate was auditing the Postal Service's security controls and processes to determine if the PCs complied with the key strategy related to security. For those PCs where no security audits were occurring, we reviewed the FY 2006 ASAP reviews to determine the deficiencies identified and whether the PCs took actions to correct them.

We interviewed the PCs' HR, Labor Relations, and Training managers; the workplace environment analyst; the areas' HR managers and analysts; and the former and current Headquarters' EAP/WEI Programs Managers 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 programs at the headquarters, area, and PC levels. We also interviewed a Headquarters Training Development Specialist and the EAP/WEI Programs Manager to determine how the NTD is used to help ensure all employees complete workplace violence prevention awareness training requirements. In addition, we reviewed the TAT meeting minutes and reports used to monitor and enforce policies and procedures to reduce violence in the workplace. We also 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 programs:

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<sup>16</sup> The five Postal Service areas of operation and 15 PCs are listed in Table 1.

<sup>17</sup> The seven climate indicators were the VOE Survey scores, grievances, EEO complaints, EAP referrals, climate assessments, OIG Hotline complaints, and OIG congressional inquiries regarding workplace environments.

<sup>18</sup> Troubled worksites are facilities where evidence exists of an ongoing history of behavioral factors that remain unresolved at the PC and area levels.

- Zero tolerance policies and action plans.
- VOE Vital Few List.<sup>19</sup>
- Attendance records for required workplace violence awareness training.
- TAT incident reports and responses.
- 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.
- Safety talks and direct mailings related to the zero tolerance policies and action plans.
- Existence of TAT Hotline numbers.

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

We conducted this performance audit from December 2007 through May 2008 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances.<sup>20</sup> 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 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 March 11, 2008, and included their comments where appropriate. We also issued reports to five area vice presidents. See [Appendix D](#) for a list of the five reports.

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<sup>19</sup> The VOE Vital Few List identifies PC facilities with the largest opportunity for VOE Survey score improvement.

<sup>20</sup> 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**

<b>Report Title</b>	<b>Report Number</b>	<b>Final Report Date</b>	<b>Monetary Impact</b>
1. <i>Postal Service's Violence Prevention and Response Program in Four Northeast Area Performance Clusters</i>	HM-AR-08-005	January 14, 2008	NA
2. <i>Postal Service's Violence Prevention and Response Program in Two Pacific Area Performance Clusters</i>	HM-AR-08-004	November 13, 2007	NA
3. <i>Postal Service's Violence Prevention and Response Program in Three Southwest Area Performance Clusters</i>	HM-AR-08-003	November 7, 2007	NA
4. <i>Postal Service's Violence Prevention and Response Program in Three Southeast Area Performance Clusters</i>	HM-AR-08-002	November 2, 2007	NA
5. <i>Postal Service's Violence Prevention and Response Program in Three Capital Metro Area Performance Clusters</i>	HM-AR-08-001	October 16, 2007	NA
6. <i>Postal Inspection Service Security Controls and Processes – Area Security Assessment Program</i>	SA-AR-07-004	July 10, 2007	\$144,000
7. <i>Postal Service Security Controls and Processes for the Pacific Area</i>	SA-AR-07-003	May 9, 2007	NA
8. <i>Postal Service Security Controls and Processes for the Capital Metro Area</i>	SA-AR-07-002	March 30, 2007	NA
9. <i>National Capping Report on the Postal Service Violence Prevention and Response Programs</i>	LB-AR-01-020	August 23, 2001	NA

This capping report summarizes the overall findings for the first five reports listed above. The remaining reports were used to evaluate whether the PCs ensured appropriate safeguards for employees, customers, and property. There are a number of other related reports that are referenced in the issued reports listed above.

**APPENDIX E: SUMMARY OF HEADQUARTERS', AREAS', AND PERFORMANCE CLUSTERS'  
CONDITIONS RELATED TO AUDIT OBJECTIVES**

<b>Objective 1 – Determine if the PCs implemented required controls (policies and procedures) to reduce the potential for violence.</b>																
		<b>Capital Metro Area</b>			<b>Northeast Area</b>				<b>Pacific Area</b>		<b>Southeast Area</b>		<b>Southwest Area</b>			
<b>1. Security Strategy – Ensure appropriate safeguards for employees, customers, and property.</b>																
<b>Condition</b>	PCs did not consistently ensure appropriate security safeguards were in place and complied with at many facilities.	X	X	X					X	X						
	PCs may not have ensured appropriate security safeguards were in place and complied with at many facilities.				X	X	X	X			X	✓	X	X	X	X
	<ul style="list-style-type: none"> <li>Area and PC managers did not maintain documentation that showed how the security deficiencies identified in 1,216 FY 2006 ASAP reviews were corrected. For example, the reviews identified that exterior doors/access points to facilities were not secured (89 deficiencies), and authorized access to the facilities was not challenged (47 deficiencies).</li> </ul>				X	X	X	X			X	✓	X	X	X	X
<b>2. Communication of Policy Strategy – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.</b>																
<b>Condition</b>	PCs disseminated FY 2006 current local zero tolerance policies to all PC employees.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	<ul style="list-style-type: none"> <li>The zero tolerance policy was not posted in 23 of the 54 facilities visited.</li> </ul>	X	✓	X	X	X	X	✓	X	X	✓	X	X	✓	X	X
	<ul style="list-style-type: none"> <li>The zero tolerance policy was not visible in two of the 31 facilities that posted it.</li> </ul>	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	<ul style="list-style-type: none"> <li>The zero tolerance policy was not signed by the lead plant manager.</li> </ul>	X	X	✓	✓	✓	X	X	X	✓	X	✓	X	X	✓	✓

Note: X indicates the PC was not in compliance.  
 ✓ indicates the PC was in compliance.  
 no symbol indicates not applicable.

		Capital Metro Area			Northeast Area			Pacific Area		Southeast Area		Southwest Area				
<b>2. Communication of Policy Strategy (continued) – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.</b>																
<b>Condition</b>	Workplace violence awareness training needed for some employees and TAT core members.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	• HR managers ensured most employees (140,055) received the required training.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	• HR managers ensured all TAT core members received the required training.	✓	✓	✓	X	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓
	• HR managers did not ensure all managers, supervisors, and 204b supervisors received the required 8-hour training.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<b>Condition</b>	TATs did not fully implement violence prevention strategies to ensure incidents of violence and inappropriate behavior were fully addressed in accordance with the TAT Guide.	X	X	X	X	X	✓	X	X	X	X	X	✓	X	X	X
	• 123 of the 214 incidents reported to TATs in FY 2006 were not properly addressed. <sup>21</sup>	X	X	X	X	X	✓	X	X	X	X	X	✓		X	X
	➤ 96 did not receive proper case management (including documenting the assessment of the risk level) <sup>22</sup> and were not monitored and traced to ensure resolution.	X	X	X	✓	X	✓	X	X	X	X	X	✓		X	X
	➤ 71 had insufficient (or no) documentation which prevented us from determining how they were addressed and resolved.	X	X	X	✓	✓	✓	✓	✓	X	X	X	✓		X	X
	➤ 71 had no documented risk abatement plans.	X	X	X	✓	X	✓	X	X	X	X	X	✓		X	X
	➤ 33 were not immediately and firmly responded to.	X	X	X	X	✓	✓	✓	✓	✓	X	X	✓		X	X
	• Incident tracking logs not properly maintained to show when 123 of the 214 incidents were reported and resolved.	X	X	X	X	✓	X	X	X	X	X	X	X		X	X

<sup>21</sup> Incidents reported to the Albuquerque TAT were not documented (no incident case files) or recorded in a tracking log and may not have been addressed.

<sup>22</sup> 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.

		Capital Metro Area		Northeast Area		Pacific Area		Southeast Area		Southwest Area					
<b>3. Environment and Culture Strategy – Create a work setting and maintain an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.</b>															
<b>Condition</b>	HR managers took positive steps toward creating an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	<ul style="list-style-type: none"> <li>HR managers did not maintain documentation on how they used other climate indicators to monitor and evaluate the workplace environment (including the frequency) except for VOE Survey results.</li> </ul>	X	X	X	X	X	X	X	X	X	✓	X	X	X	X
<b>Condition</b>	TATs did not consistently conduct quarterly meetings, properly prepare meeting minutes, and disseminate minutes to required TAT members.	X	X	X	X	X	✓	X	X	X	X	X	X	X	✓
	TATs had the requisite number and type of team members required by the TAT Guide.	✓	✓	✓	✓	✓	✓	X	✓	X	✓	✓	✓	✓	✓
<b>Condition</b>	Measures to gauge TATs' success were not documented and may not have been adequate. <sup>23</sup>	X	X	X	X	X	X	X	X	✓	X	X	X	X	X
	<ul style="list-style-type: none"> <li>TATs informally obtained verbal feedback or conducted after action reviews with employees.</li> </ul>	✓		✓					✓						
	<ul style="list-style-type: none"> <li>TATs informally used TAT discussions and reviews of VOE Surveys.</li> </ul>		✓		✓	✓	✓	✓			✓	✓	✓		✓
	<ul style="list-style-type: none"> <li>TAT used surveys as identified in the TAT Guide and maintained documentation.</li> </ul>									✓					
	<ul style="list-style-type: none"> <li>TAT did not document informal measurements.</li> </ul>	X	X	X	X	X		X	X	✓	X	X	X		X
	<ul style="list-style-type: none"> <li>TAT informally measured its performance by using risk abatement plans and evaluating the incidents during TAT meetings.</li> </ul>						X								

<sup>23</sup> The Albuquerque PC did not discuss or establish measures to evaluate the team's performance.

<b>Objective 2 – Determine the adequacy of oversight of the workplace violence prevention programs at the headquarters, area, and PC levels.</b>																
		Capital Metro Area			Northeast Area			Pacific Area		Southeast Area			Southwest Area			
<b>Oversight of the Workplace Violence Prevention and Response Programs</b>																
Condition	Area and PC HR managers did not provide adequate oversight of the violence prevention and response programs.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	<ul style="list-style-type: none"> <li>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.</li> </ul>	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	<ul style="list-style-type: none"> <li>PC managers did not ensure appropriate TAT processes were followed.</li> </ul>	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	<ul style="list-style-type: none"> <li>PC managers did not ensure that performance measures were documented.</li> </ul>	X	X	X	X	X	X	X	X	✓	X	X	X	X	X	X
	<ul style="list-style-type: none"> <li>Former area HR managers did not ensure the PCs implemented the programs even though the OIG recommended improvements in August 1999 and September and November 2000.</li> </ul>		X	X					X		X	X	X			
	Headquarters EAP/WEI Programs Office did not provide adequate oversight of the violence prevention and response programs.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	<ul style="list-style-type: none"> <li>The activities of the 15 PCs were not monitored and TAT processes were not reviewed to determine compliance with the TAT Guide and whether the processes were effective or needed improvement.</li> </ul>	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

## APPENDIX F: MANAGEMENT'S COMMENTS

DOUG A. TULINO  
VICE PRESIDENT, LABOR RELATIONS



April 23, 2008

JOHNSON JOHN

SUBJECT: Violence Prevention and Response Programs in Selected Locations—  
Capping Report—Management Response Report #HM-AR-08-DRAFT

The following is the Postal Service response to the above referenced audit on the Postal Service Violence Prevention and Response Programs.

The overall objective of the audit was to determine if the violence prevention and response programs in the 15 judgmentally selected performance clusters effectively reduced the potential for violence. We have provided feedback and continue to be concerned that this objective is flawed and inconsistent with workplace violence research. The auditors looked at whether activities and compliance measures were carried out. We believe the objective statement should reflect and be consistent with the activities and compliance measures of the auditors. We do not believe that is the case for this audit.

The objective stated in the 2001 National Capping Report on the Postal Service Violence Prevention and Response Programs (Report #LB-AR-01-020) is more reflective of the activities your auditors reviewed and better described what took place in this audit. The objective in that report stated, "Our overall objective was to determine whether the 25 districts implemented Postal Service's policies regarding violence prevention and response programs." We believe that is exactly what took place during this audit process.

Our specific responses to the audit recommendations are as follows:

**Recommendation #1:**

Instruct all area and performance cluster Human Resources managers to use the National Training Database Executive Administrative Service Report to identify supervisors and managers who have not received the eight-hour (one time) workplace violence awareness training.

**Response:**

We concur with this recommendation and will issue a memorandum within 60 days that reminds Human Resources managers to identify supervisors and managers who have not received the eight-hour (one-time) workplace violence awareness training.

**Recommendation #2:**

Ensure 204b supervisors detailed for extended periods (more than a week) or frequently detailed over time receive workplace violence awareness training on communications skills, how to identify potentially threatening situations, and behavioral warning signs of at-risk employees. Management could modify training for 204b supervisors detailed for shorter periods (a week or less) to include written instructions or a point paper on how to respond to threatening situations.

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**Response:**

We concur, in part, with this recommendation. We agree that only 204b supervisors who are detailed for an extended period of time, or who are frequently detailed, should receive the workplace violence awareness training. However, we believe that the determination of which 204b supervisors receive the training should be determined locally. This would allow local management to make the decision based on local circumstances, such as the availability and proximity of other supervisors or managers who have received the training, and the frequency and length of time each 204b supervisor is normally used.

**Recommendation #3:**

Coordinate with the vice presidents, Employee Development and Diversity, and Employee Resource Management to determine the most efficient way for area and performance cluster Human Resources managers to identify 204b supervisors and their completion of workplace violence awareness training or other mandatory training required for their position.

**Response:**

We concur with the recommendation to track the completion of workplace violence awareness training which local offices require for their 204b supervisors. We will meet with the Vice Presidents, Employee Development and Diversity, and Employee Resource Management to determine whether there is an efficient method for the local offices to identify employees who act as 204b supervisors.

**Recommendation #4:**

Determine if the findings related to the five areas and 15 performance clusters exist in the remaining Postal Service areas—Eastern, Great Lakes, New York Metro and Western—and their performance clusters, and where necessary, take action to ensure management implements adequate controls.

**Response:**

The Postal Service concurs with this recommendation as it relates to our existing compliance policies and procedures. A memorandum will be issued to all district Human Resources managers to review compliance measures as outlined in chapter seven of Publication 108. The review is anticipated to be six months in duration, at which time, we will update you with the status of that review.



Doug A. Tulino

cc: Delores Gentry  
Christina Nicoloff