September 30, 1998

MICHAEL S. COUGHLIN DEPUTY POSTMASTER GENERAL

SUBJECT: Status of Management Actions Taken for USPS Inspection Service Reports on Labor Management Practices Related to Potential Violence in the Workplace (PA-MA-98-004)

Congressman John McHugh, Chairman, Subcommittee on the Postal Service, requested on December 22, 1997, that the United States Postal Service (USPS) Office of Inspector General (OIG) provide the status of management actions taken in response to findings and recommendations included in reports issued by the USPS Inspection Service (Postal Inspection Service) to USPS management (Postal management). The reports addressed weaknesses in labor management practices that could contribute to violence in the workplace.

Our objective was to determine the status of management actions taken to correct deficiencies identified in seven labor management reports issued by the Postal Inspection Service. This review was conducted in June and July 1998. To conduct our review, we retrieved information from the Postal Inspection Service Tracking System¹ to determine the status² for each finding and recommendation for the following seven labor management reports:

- 1. Audit of Pacific Equal Employment Opportunity (EEO) Activity, August 1997.
- 2. National Coordination Audit of USPS Hiring Practices, January 1997.
- National Coordination Audit of Enhance Workplace Behavior, January 1997.
- 4. Audit of Employee Commitment, January 1993.
- 5. Audit of USPS Hiring Process, September 1992.

¹ USPS Inspection Service Tracking System – Systems Review Tracking Network (SRTN) is used to track information on audit findings and recommendations, reviews, investigations, and management responses to identified issues.

² Status denotes complete, pending, or incomplete.

	 6. Review of Alleged Systemic Violations of Regulations and Laws Relating to the Treatment of Postal Employees in Milwaukee, Wisconsin, April 1997. 7. Review of Greater Southern California Area Employee- Management Relations, Seattle Division, February 1996. We also requested management provide written confirmation on the corrective actions taken in response to the findings and recommendations.
Results in Brief	The Postal Inspection Service provided Postal management with 33 findings and related recommendations addressing labor management practices that could contribute to violence in the workplace. Management took corrective action for 29 (88 percent) of the 33 findings. For the remaining four findings, two findings were not sufficiently addressed by management. Postal management should provide guidance to the Area and the District to assist with resolving the two findings. Postal management disagreed with the other two findings; therefore, no corrective action was taken.
Background Seven Labor Management Reports	From September 1992 to August 1997, the Postal Inspection Service issued seven labor management reports. The reports included findings and recommendations addressing Equal Employment Opportunity Complaint processing, applicant suitability screening, workplace behavior, communications, security and personnel safety, and compliance with labor contracts.
Tracking and Monitoring Reports	Postal management in coordination with the Postal Inspection Service is responsible for monitoring reports issued by the Postal Inspection Service to assure appropriate actions are taken in response to findings and recommendations. Tracking and monitoring audit findings and recommendations (the follow-up process) is an inherent management function in the private as well as the public sector ³ . Management should monitor the follow-up process, checking with and encouraging operating officials to assure an appropriate response to the audit report. Management should assess or approve the adequacy and cost effectiveness of its corrective actions and take necessary steps to rectify continuing problems.
	reported findings and recommendations to ascertain whether resolution has been effectively achieved. The Postal Inspection Service disseminates a memorandum to Postal management

³ Richard L. Ratliff, et al; <u>Internal Auditing Principles and Techniques</u>, 1996, the Institute of Internal Auditors, Altamonte Springs, FL

	semiannually (January and July) requesting the status of findings and recommendations for audits, reviews, or investigations. Also, the Postal Inspection Service tracks corrective actions management has taken in response to the identified weaknesses using the Systems Review Tracking Network (SRTN).
Observations	Management had taken action to address most of the deficiencies identified in the seven labor management reports issued by the Postal Inspection Service. Specifically, management addressed 29 of the 33 (88 percent) findings and related recommendations. (See Attachment 1 for the Labor Management Reports Status Summary and Attachment 2 for a Summary of Findings and Recommendations). For the remaining four findings, two findings were not sufficiently addressed by management. Postal management should provide guidance to the Area and the District to assist with resolving the two findings. Postal management disagreed with the other two findings; therefore, no corrective action was taken. The following paragraphs summarize the details.
Management Actions Not Taken	Management and the Inspection Service did not make sure that corrective actions were taken to address identified deficiencies for two findings and related recommendations. Specifically, for the National Coordination Audit of Enhance Workplace Behavior, management did not ensure that appropriate actions were taken to evaluate workplace behavior programs. In addition, for the Audit of Employee Commitment, management did not evaluate the survey results to develop an action plan for improving barriers between management and the workforce. Management contended that they either took alternative actions or were unaware of the findings. Following up on corrective actions taken helps ensure that identified deficiencies are effectively resolved. ⁴
Unresolved Findings	Management disagreed with two findings and related recommendations and thus, did not take corrective actions to address the identified deficiencies. Specifically during the Audit of Pacific EEO Activity, the Inspection Service issued two findings to assist Postal management with improving the EEO program. However, Area management disagreed with the findings because they contended Headquarters EEO and Compliance should address the issues and provide guidance to the Area Office to correct the deficiencies. As a

⁴ We addressed management's responsibilities for follow-up actions in Audit Report PA-MA-98-001, Enhancement of USPS Audit Reporting and Follow-up System dated March 31, 1998.

	result, significant deficiencies were not corrected because a system to resolve differences was not in place. ⁵
Suggestions	As a result of our review, we suggest that the Vice President, Human Resources take corrective actions to address the unresolved findings and related recommendations included in the three reports. See Attachment 2 for summarized details on the findings and related recommendations.
Management Comments	The Vice President, Human Resources agreed to implement the suggestions included in this report. Specifically, for the Audit of Enhance Workplace Behavior, USPS will disseminate a follow up memorandum to the field managers not later than October 15, 1998 requesting the status of actions to date. Also, for the Audit of Employee Commitment, USPS is currently preparing documents to inform Congress regarding some of the efforts being undertaken to achieve improved relations and will provide USPS OIG with the information when it is completed. The Vice President, Human Resource's comments are included in Attachment 3 of this report. In addition, Vice President, Labor Relations agreed with the audit suggestions regarding the Audit of Pacific Area EEO Activity. Specifically, he stated that the USPS EEO Complaint Tracking System (EEO CTS) enables management to perform many of the recommended tasks including providing management with the ability to assign case numbers and track them. EEO CTS will, however, be revised in FY99 to track information in more detail. Additionally, the Vice President, Labor Relations, stated that performance cluster goals will focus on reducing both formal complaints and pre-complaint counseling request. Finally, as a result of further discussion with officials of the Equal Employment Opportunity Commission (EEOC), and as part of our review of intake procedures in connection with the nation roll out of the REDRESS Program for mediating EEO disputes, we have decided to define more precisely when the 30-day period begins. This will be incorporated into an update of Handbook EL-603. The Vice President, Labor Relation's comments are also included in Attachment 3 of this report.
Evaluation of Management Comments	The Vice President, Human Resources and the Vice President, Labor Relations comments are responsive to the suggestions identified in the report.

⁵ This issue will be addressed in a future review of the audit resolution process.

We are continuing research on the USPS management's efforts in controlling and reducing violence in the workplace. If you have any questions or would like to further discuss these issues, please contact Debbie Pettitt, Director, Delivery/Other Operations, or me at (703) 248-2300.

Colleen McAntee Assistant Inspector General for Performance

cc: Yvonne D. Maguire John R. Gunnels Alan B. Kiel

Major contributors to this report:

Debra Pettitt Sandra Bruce Gary Cherry Larry Thornton Remedios Blake Steve Pinard Josephine Davis Rosa Howard

Labor Management	Reports	Status	Summary
------------------	---------	--------	---------

1. Tim 2. Con 3. Equ 4. Trai 5. Sup 6. Perf 2. National Constraints 1. Offi 2. Mea 3. Proc 3. Proc 4. Audit of Er Emp Emp 5. Audit of Us 1. Mar 2. Rev 3. Loc: 4. FBI	cific Area EEO Activity eliness and Accuracy of Complaint Processing nplaint Workhour Reporting System al Employment Opportunity Resolution ning Record Maintenance ervisor Training formance Cluster Goals and Objectives Dordination Audit of USPS Hiring Practices ce of Personnel Management Submissions asuring the Effectiveness of the Hiring Process ressing Office of Personnel Management Results	5 1 1 2 1 2 4 3 1	001 002 001 001 002 003 003 003
 Con Equ Fqu Fqu Frai Supp Supp Perf 2. National Control 1. Offi 2. Meta 3. Proce 3. National Control 3. National Control Prog 4. Audit of Er Emp 5. Audit of Us Mar Rev Locc FBI 	al Employment Opportunity Resolution ning Record Maintenance ervisor Training formance Cluster Goals and Objectives bordination Audit of USPS Hiring Practices ce of Personnel Management Submissions usuring the Effectiveness of the Hiring Process	1 1 2 1 2 4 3	002 001 001 001 002 003 003
 Con Equ Fqu Fqu Frai Supp Supp Perf 2. National Control 1. Offi 2. Meta 3. Proce 3. National Control 3. National Control Prog 4. Audit of Er Emp 5. Audit of Us Mar Rev Locc FBI 	al Employment Opportunity Resolution ning Record Maintenance ervisor Training formance Cluster Goals and Objectives bordination Audit of USPS Hiring Practices ce of Personnel Management Submissions usuring the Effectiveness of the Hiring Process	1 1 2 1 2 4 3	002 001 001 001 002 003 003
 3. Equ 4. Trai 5. Supp 6. Perf 2. National Control 1. Offi 2. Mea 3. Procession 3. National Control Cont	al Employment Opportunity Resolution ning Record Maintenance ervisor Training formance Cluster Goals and Objectives Dordination Audit of USPS Hiring Practices ce of Personnel Management Submissions usuring the Effectiveness of the Hiring Process	1 2 1 2 4 3	001 001 002 003 003
 4. Trai 5. Supp 6. Perf 2. National Control 1. Offi 2. Mea 3. Proce 3. National Control 3. Proce 4. Audit of Er Emp 5. Audit of US 1. Mar 2. Rev 3. Location 4. FBI 	ning Record Maintenance ervisor Training formance Cluster Goals and Objectives bordination Audit of USPS Hiring Practices ce of Personnel Management Submissions isuring the Effectiveness of the Hiring Process	2 1 2 4 3	001 001 002 003 003
 Supe Supe Perf National Control Offi Mea Proce National Control Prog Audit of Er Emp Audit of Use Audit of Use Mar Rev Location FBI 	ervisor Training formance Cluster Goals and Objectives bordination Audit of USPS Hiring Practices ce of Personnel Management Submissions usuring the Effectiveness of the Hiring Process	1 2 4 3	001 002 003 003
 Perf Perf National Control Offi Mea Proce National Control Prog Audit of Er Emp Audit of US Mar Rev Loca FBI 	ormance Cluster Goals and Objectives oordination Audit of USPS Hiring Practices ce of Personnel Management Submissions usuring the Effectiveness of the Hiring Process	43	002 003 003
 Offi Mea Mea Proc National Constant Prog Audit of Er Emp Audit of US Mar Rev Loc: FBI 	ce of Personnel Management Submissions suring the Effectiveness of the Hiring Process	3	003
 Mea Proc National Constraints Prog Audit of Err Emp Audit of US Mar Rev Loca FBI 	suring the Effectiveness of the Hiring Process	3	003
 Mea Proc National Constraints Prog Audit of Err Emp Audit of US Mar Rev Loca FBI 	suring the Effectiveness of the Hiring Process	3	003
 Processing National Constraints Progent Audit of Err Emp Audit of US 1. Mar 2. Rev 3. Locc 4. FBI 	6		
 National Correspondence of the program. Audit of Errespondence of the program. Audit of Errespondence of the program. Emp Audit of Use of the program. Mare of the pro	essing Office of Personner Management Results		
Prog 4. Audit of Er Emp 5. Audit of Us 1. Mar 2. Rev 3. Loc 4. FBI		I	005
 4. Audit of Er Emp 5. Audit of Us 1. Mar 2. Rev 3. Loc 4. FBI 	oordination Audit of Enhance Workplace Behavior		
Emp 5. Audit of US 1. Mar 2. Rev 3. Loc 4. FBI	gram Management	3	003
 Audit of US Mar Rev Loc FBI 	nployee Commitment		
 Mar Rev Loc. FBI 	oloyee Commitment	1	001
 2. Rev 3. Loc 4. FBI 	SPS Hiring Process		
 2. Rev 3. Loc 4. FBI 	agement Accountability	1	001
 Loc. FBI 	iew of Hiring Process	1	003
4. FBI	al and State Criminal Checks	3	001
	Fingerprint Search	2	001
.). FIIO		<u>-</u> 3	001
	•	3	001
	r Employment	2	001
	•		001
9. Trai	r Employment tary Service Evaluation rviews		
10. Eval	r Employment tary Service Evaluation views lication Review	2 2	001

	Title of Finding	# of <u>Rec's</u>	<u>SRTN</u>
	ew of Alleged Systemic Violations of Regulations and Laws atment of Postal Employees in Milwaukee, Wisconsin	Relating to	the
1. 2. 3. 4. 5. 6.	Complaints by Bargaining Unit Employees EEO Review Labor Relations Process Staffing Issues Postal Management Interviews Statistical Update Overall Recommendation:	1	None
	ew of Greater Southern California Area Employee-Manager tle Division	ment Relation	ons,
1. 2. 3. 4. 5.	Overall Ratings Facility Security Violence in the Workplace Employee—Management Relations Union – Management Relations Overall Recommendations:	7	None

Legend:

# Rec's. SRTN	Number Recommendations The Postal Inspection Service tracking System
Status Implen	nentation Codes:
001	Completed
002	Management did not agree
003	Will be completed per action plan
004	Management action not taken

Summary of Findings and Recommendations

1. Audit of Pacific EEO Activity

The audit report addressed six findings and related recommendations to establish opportunities for improving the EEO program within the Pacific Area.

- <u>IS Tracking System Status</u>. The tracking system showed management actions taken on four of six findings and related recommendations were completed. However, management disagreed with the remaining two findings addressing EEO counseling timeframes and an EEO complaint workhour reporting system. Area management indicated that Headquarters, EEO Compliance and Appeals Office is responsible for addressing the issues. Thus, the Postal Inspection Service coded the findings as "002" (Management did not agree) and did not conduct any further work.
- Status Confirmation. Management has taken actions to address four of six findings and related recommendations. Area management contended that headquarters management should address these issues and provide guidance to the areas. The unresolved recommendations were:

Provide Area and District EEO offices with guidance to :

- Establish an official management policy statement on the start date for counseling timeframes.
- Develop and implement an EEO complaint workhour reporting system to accurately report, track, and monitor workhours spent processing EEO complaints.

2. National Coordination Audit of USPS Hiring Practices

The report addressed three findings and related recommendations concerning Office of Personnel Management Submissions, Measuring the Effectiveness of the Hiring Process, and Processing of Office of Personnel Management (OPM) Results. Overall, the audit disclosed that 30 percent of the new hires in the sample did not have an OPM background investigation requested after appointment. This was a continuing problem disclosed in prior audits.

IS <u>Tracking System Status</u>. The tracking system showed three findings and related recommendations coded as "003", indicating management will complete action per future plans.

<u>Status Confirmation</u>. Headquarters management agreed with each finding and related recommendations stating that they are partnering with the Postal Inspection Service to conduct a national review of the Postal Service Special Agency Check (SAC) process as well as performance reviews at the local level. However, the Postal Inspection Service did not perform audit follow up to ensure that management took actions to correct identified deficiencies.
 <u>Note</u>: This report superseded and addressed the findings and recommendations included in the report, Audit of USPS Hiring Process, dated, September 1992.

3. National Coordination Audit of Enhance Workplace Behavior

The audit was a study that provided results and statistics to support responses to an employee questionnaire used to capture information concerning workplace violence. The report contained one finding and related recommendations.

- □ <u>IS Tracking System</u>. The tracking system showed one finding and related recommendations with a status implementation code of "003", indicating management will complete action per future plans.
- Status Confirmation. Headquarters management did not take actions to correct identified deficiencies. According to management, they did not want to establish parallel systems to CustomerPerfect! and contended that CustomerPerfect! would address the recommendations included in the report. Although in a memorandum dated April 23, 1997, headquarters management reinforced the need for the field managers to apply the principles of program and process management to workplace programs, we were unable to determine if this action sufficiently addressed the identified deficiencies. In addition, the Postal Inspection Service did not conduct audit follow up to ensure that management took actions to correct identified deficiencies.

The unresolved recommendation was: Ensure responsible management officials establish a comprehensive approach for evaluating workplace behavior programs, including cost-benefit analysis, and monitoring the evaluation process.

4. Audit of Employee Commitment

The audit was a study providing results and statistics to support responses to an employee questionnaire. The questionnaire captured information regarding management's effectiveness in creating a workplace that promotes increased employee commitment. There was one finding and a related recommendation included in the report.

- <u>IS Tracking System</u>. The tracking system only showed one finding and recommendation with an implementation code "001", indicating action completed. The recommendation required management to analyze survey results to develop strategies for improvement. Management generally concurred with the results and agreed to accelerate the use of the Employee Opinion Survey results to address barriers between management and the workforce.
- Status Confirmation. Area management stated they were unaware of the report. Further, Employee Opinion Surveys were halted in FY 95, and therefore, survey results were not used to address the finding and recommendation included in the report.

The unresolved recommendation was: Develop and execute an action plan for management to address the survey results for improving barriers between management and the workforce.

5. Audit of USPS Hiring Process

The report addressed ten findings and related recommendations. However, according to the Postal Inspection Service and management, the findings and recommendations were addressed in the National Coordination Audit of Hiring and Practices, PA (1), January 1997.

6. Review of Alleged Systemic Violations of Regulations and Laws Relating to the Treatment of Postal Employees in Milwaukee, Wisconsin:

The report addressed seven areas of concern with one overall recommendation relating to labor management practices at the Milwaukee Processing and Distribution Center.

- IS Tracking System. The tracking system did not provide details on the seven areas of concern and the one recommendation included in this report. Interviews with Postal Inspection Service system personnel disclosed that they were not required to follow up on final reports denoted as "Other".
- Status Confirmation. Management implemented the training program as recommended. However, a subsequent OIG review⁶ showed that the program did not help to improve managers and supervisors' human relations and leadership skills.

⁶ The Office of Inspector General did extensive work in this area addressing the findings and recommendations included in the report, which is scheduled to be released to management shortly.

7. Review of Greater Southern California Area Employee-Management Relations, Seattle Division

The report was a workforce study addressing five areas of concern including related recommendations regarding individual and organizational effectiveness.

- <u>IS Tracking System</u>. The tracking system did not provide details on the areas of concern and recommendations included in the report. Interviews with Postal Inspection Service system personnel disclosed that they were not required to follow-up on final reports coded as "Other".
- □ <u>Status Confirmation</u>. Management has taken corrective actions to improve individual and organizational effectiveness of the Seattle Division.

Additionally, because the Postal Inspection Service's tracking system did not include specific details for two of the reports (coded as "other"), the Inspection Service has no means of verifying the status of management actions taken to correct identified deficiencies. However, this issue will be addressed in a systemic audit of U.S. Postal Inspection Service Audit Recommendation and Tracking System currently being conducted by USPS OIG.

MANAGEMENT COMMENTS

YVONNE D. MAGUIRE VICE PRESIDENT HUMAN RESOURCES



September 21, 1998

COLLEEN MCANTEE, ASSISTANT INSPECTOR GENERAL FOR PERFORMANCE

SUBJECT: Draft Management Advisory Report - Inspection Service Reports, Labor Management Practices (PA-MA-98-OXX)

Enclosed are the comments responding to your suggestions regarding Inspection Service audit-"Enhance Workplace Behavior" and "Employee Commitment." John E. Potter, Senior Vice President for Labor Relations, is addressing the "Audit of Pacific EEO Activity" under separate cover.

١ Avonne o Magoire

Enclosure

cc: Michael S. Coughlin, Deputy Postmaster General John E. Potter, Senior Vice President, Labor Relations

475 L'ENFANT PLAZA SW WASHINGTON DC 20260-4200 202-268-3783 FAX: 202-268-3803

MANAGEMENT COMMENTS

Response to August 24, 1998 IG Draft Management Advisory Report -Inspection Service Reports, Labor Management Practices (PA-MA-98-0XX)

 The unresolved recommendation from the "National Coordination Audit of (sic) Enhance Workplace Behavior" was that responsible management officials "establish a comprehensive approach for evaluating workplace behavior programs, including cost-benefit analysis, and monitoring the evaluation process."

As noted in the IG draft report, an April 23, 1997 memorandum asked field managers to apply the principles of process management, particularly the evaluative component, to programs designed to enhance the workplace environment. A follow-up memorandum will go to these same field managers not later than October 15 asking them to report within 45 days on their actions to date in making evaluation an integral part of such programs. Headquarters action in response to that will depend on the area actions reported. If more is needed, we will work with the areas to accomplish the goal of having managers intentionally consider the value-added of such workplace environment programs. This process will also be conducted in a cost-effective fashion.

2. The unresolved recommendation from the referenced audit report, "Employee Commitment-Southeast and Southwest Areas" (Case No. 042-1079958-AO(2), dated March 1993, was "Develop and execute an action plan for management to address the survey results for improving (sic) barriers between management and the workforce." (Note: Since this report was not originally transmitted to Headquarters, we obtained a copy from the IG. The draft IG report to Mr. Coughlin places the report in January 1993, the copy of the report we received has the March, 1993 date, and the Inspection Service Data Base Information System printout gives the date of the final report to the Southeast and Southwest Area Managers as March 10, 1994. For purposes of these comments, we are assuming that all references are to the same report.)

The audit focuses on an Inspection Service designed and conducted survey of almost 3,000 craft and first line supervisors conducted on unspecified dates "during the restructuring." The recommendations were delivered to the then Area Managers of Customer Services and Processing and Distribution in the two areas (Leo Fudela, Don Spatola, Hector Barrazza and Jeannette Cooper) on March 12, 1993.

At the time of audit, the Inspection Service determined that it needed to conduct its own employee survey because, even though the first I mployee Opinion Survey (EOS) of all USP(3) employees had been conducted in the spring of 1992, the results had not been released. (Because of the organizational restructuring and the consequent need to reconfigure the survey data, the results were not released until February 1993.) While the audit does not detail the sampling plan, the 3,000 questionnaires were distributed at processing and delivery units in eight major cities and selected smaller sites, as well as the regional office.

The Inspection Service report characterizes the survey results rather than presenting the specific data. The report says that the survey responses reflect "a general tone of distrust, lack of honest information, little input into daily business decisions, not understanding what top management does, seldom see follow through on promises, don't know if they are meeting supervisor expectations, and lack of concern for welfare and environment." The IG report indicates that area management agreed with the unresolved recommendation. Between March 1993 and June 1998 when the IG review was conducted, however, there has not only been a complete turnover of area leadership, but also the complete restructuring of the area in the summer of 1994.

Subsequent to the issuance of this Inspection Service report, the 1992 EOS results were distributed nationwide. Further EOS surveys were conducted in 1993, 1994 and 1995. An EOS

Labor Management Practices Related to Potential Violence in the Workplace

MANAGEMENT COMMENTS

Index was developed and made part of the EVA based variable pay program for executives in FY 94 and FY 95. During FY 95, all performance clusters were required to develop action plans, and action plans from PCs with low and declining EOS indices were submitted to Headquarters for review. Because of an effective union boycott of the 1995 EOS, management made a determination not to use the EOS Index scores for the FY 1995 variable pay program. No EOS surveys were conducted after this.

Based on the recommendations of the *CustomerPerfect!* "establish" process for FY 1998, we have designed a new Voice of the Employee (VOE) survey, with input and in some cases cooperation from the unions. Unlike the EOS, this is a rolling quarterly sample of employees. Employee responses will be analyzed by management at all levels to help set priorities for improving the workplace environment.

The above resolves specifically the question of the use of employee surveys to reduce barriers between management and the workforce. Other, broader efforts are being undertaken to achieve improved relations. We are currently preparing documents to inform Congress regarding some of these efforts and will provide you with that information when it is completed We expect to do so by mid-October.

Labor Management Practices Related to Potential Violence in the Workplace

MANAGEMENT COMMENTS

JOHN E. POTTER SENIOR VICE PRESIDENT, LABOR RELATIONS



September 23, 1998

COLLEEN A. MCANTEE ASSISTANT INSPECTOR GENERAL FOR PERFORMANCE

SUBJECT: Draft Management Advisory Report-Inspection Service Reports, Labor Management Practices (PA-MA-98-0XX)

This is in reference to the Draft Management Advisory Report-Inspection Service Reports, Labor Management Practices (PA-MA-98-0XX), which was forwarded to Deputy Postmaster General Michael S. Coughlin for review and comment. The Draft Report indicated that the Inspection Service had conducted an EEO Audit of the Pacific Area and that certain recommendations were not adopted locally, but referred to National Headquarters for further review. Although not identified in the Draft Report, the two recommendations from the Inspection Service Audit which were referred to National Headquarters for further consideration involved the establishment of a work hour reporting system for EEO complaints, and the establishment of goals in the field to reduce EEO counseling requests and provide for a better program for early dispute resolution. The following comments are provided regarding these two recommendations.

WORK HOUR REPORTING SYSTEM. The establishment of a work hour reporting system was recommended so that management would have a better way of determining the costs associated with EEO complaint processing, as well as a system to track case progress, evaluate productivity, and perform trend analysis. We already have an EEO Complaint Tracking System, (EEO CTS), however, which enables management to perform many of the tasks in the recommendation. While the EEO CTS does not track each hour an EEO professional spends on each case, it does provide management with the ability to assign cases and track them by individual EEO professional, ascertain the status of each case, and determine the length of time it takes to complete each stage of case processing. Further, it tracks cases by type of discrimination alleged, allowing management to determine if certain types of cases take longer than others. It should be noted that the EEO CTS will be revised during FY 99 to track information in more detail, including cases which are referred to REDRESS which is the Postal Service's Alternative Dispute Resolution (ADR) process for EEO claims. The utility of tracking cases based on individual work hours will be reviewed as part of the overall systems redesign effort.

PERFORMANCE CLUSTER GOALS AND OBJECTIVES. The establishment of specific goals to reduce the number of pre-complaint counseling requests was recommended as a means of reducing costs. At the time of the Inspection Service Audit, the REDRESS Program was at the pilot stage, but has since been rolled out nationally. In the offices in which REDRESS has been piloted, it was found that pre-complaint counseling requests often increased as employees became aware of the availability of mediation as a means of discussing issues with management. As a result, the initial focus of REDRESS has been to resolve disputes at the pre-complaint

475 L'ENFANT PLAZA SW WASHINGTON DC 20260-4100 202-268-3619 FAX: 202-268-3074 **

MANAGEMENT COMMENTS

-2-

counseling stage to achieve a reduction in the number of formal complaints filed. It is the processing of formal complaints which represents the more costly part of the process. To the extent that goals are established, the initial focus will be on the reduction of formal complaints. As the overall workplace climate improves, a reduction in pre-complaint counseling requests may occur as well.

John E. . . toto cc: Michael S. Coughlin

MANAGEMENT COMMENTS



September 30, 1998

COLLEEN A. MCANTEE ASSISTANT INSPECTOR GENERAL FOR PERFORMANCE

SUBJECT: Draft Management Advisory Report - Inspection Service Reports, Labor Management Practices (PA-MA-98-0XX)

This is in further reference to the subject report, which identified in an attachment one additional recommendation from the Inspection Service stemming from an EEO Audit of the Pacific Area. This recommendation was not addressed in our earlier response dated September 23, 1998.

The recommendation we did not previously address involved the development of a national policy statement regarding the start date for the 30-day pre-complaint counseling period prescribed in 29 CFR 1614.105(d). This recommendation was made as a result of different answers which were obtained from Pacific Area EEO Counselor/Investigators during the course of audit interviews.

We did not believe that a national policy statement was necessary as we had already identified the start date in our Equal Employment Opportunity Complaint Processing Handbook, EL-603, which provides guidance for EEO Counselor/Investigators. Section 2.132(e) states that a final interview must be conducted within 30 days of the date the counselee sought counseling, unless the counselee agrees in writing to an extension of an additional 60 days.

As a result of further discussions with officials of the Equal Employment Opportunity Commission (EEOC), and as part of our review of intake procedures in connection with the national roll out of the REDRESS Program for mediating EEO disputes, we have decided to define more precisely when the 30-day period begins. This will be incorporated into an update of Handbook EL-603.

Peter L. Sarwood Manager EEO Compliance and Appeals

475 L'ENFANT PLAZA SW WASHINGTON DC 20260

MANAGEMENT COMMENTS