



October 5, 2023

JOHN CHIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Amended Audit Resolution—U.S. Postal Service's Response to Sexual Harassment Complaints (Project Number 21-173-R23)

This amends the Postal Service's July 13, 2023, memorandum as recommended by the Office of the Inspector General (OIG) during a meeting on September 7, 2023. The amendment below clarifies the USPS response to Recommendation 2 by explaining the addition of a tracking module to the Workplace Environment Tracking System (WETS).

The Postal Service (USPS) and representatives from the Office of the Inspector General (OIG) met on March 28, 2023, to discuss recommendation numbers 1 and 2 of the U.S. Postal Service's Sexual Harassment Complaints Audit (21-173-R23). Based on the discussion, the USPS agreed to revisit the OIG's recommendations and determine what alternatives can be implemented to remedy the OIG's concerns.

Recommendation 1: We recommend the Chief Human Resources Officer periodically conduct an employee-wide survey to assess the extent to which sexual harassment is not reported to the Postal Service and evaluate the effectiveness of the Postal Service's anti-harassment policies and procedures.

Management disagrees with this recommendation as we already have various ways of reporting harassment (including sexual harassment).

1. New Employee Orientation
 - The Equal Employment Opportunity (EEO) segment includes sexual harassment prevention and reporting procedures.
2. Policies
 - Policy on Workplace Harassment—Issued annually, required to be posted in all facilities.
 - EEO Policy Statement—Issued annually, required to be posted in all facilities.
3. Publications
 - Publication 552, *Manager's Guide to Understanding, Investigating, and Preventing Harassment*
 - Publication 553, *Employee's Guide to Understanding, Preventing, and Reporting Harassment*
4. Posters / Visual Reminders
 - Poster 159—*Workplace Harassment: Know Your Rights, Take Responsibility!*
 - Poster 72—*Equal Employment Opportunity is the Law*, required to be posted in all facilities.
 - Poster 128—*To Them Their Comments Are Harmless: To Her They Are Offensive*
 - Poster 143—*This Is Serious Business*

5. Training
 - New Supervisor Program Training
 - Postal Leadership Training Courses
 - Offers training and refresher training for functional areas as requested by leadership.

Revised Response / Action Plan:

The recommendation status will be changed to “Agreed” in both the OIG’s and management’s tracking systems.

To close the recommendation, management agrees to take the following actions:

Management will implement the following additional communications effort to ensure employees are aware of the Postal Service’s anti-harassment policies and procedures for reporting harassment (including sexual harassment) and feel empowered to report:

1. Mail Publication 553, *Employee’s Guide to Understanding, Preventing, and Reporting Harassment*, along with a letter from the Postmaster General to employees’ homes reinforcing the agency’s commitment to a workplace free from harassment.
2. Create cards that can be worn behind ID badges that include harassment (including sexual harassment) reporting procedures. Managers will conduct a stand-up talk regarding harassment and hand out cards to employees.
3. Include Publication 553 in the Human Resources Shared Service Center package sent to new hires with their benefit information.
4. USPS News Link article on identifying and reporting harassment (including sexual harassment).
5. Set up a toll-free harassment hotline that communicates through a recording how to report harassment.

Target Implementation Date—April 30, 2024

Responsible Official: Director, EEO Compliance and Appeals

Recommendation 2: We recommend the Vice President, Labor Relations, develop a verifiable process for all sexual harassment complaints from multiple systems to be accurately collected, monitored, and analyzed in accordance with Equal Employment Opportunity Commission requirements.

Management disagrees with this recommendation because the USPS meets the Equal Employment Opportunity Commission’s (EEOC’s) system data requirement with respect to collecting, monitoring, and analyzing data.

In regard to the OIG’s concern about duplicate cases being reported to the EEOC, this will not occur because the harassment (including sexual harassment) cases in [REDACTED] are reported to the EEOC on the 462 Report. The purpose of the 462 Report is for agencies to submit a summary of their EEO complaints and activities to the EEOC. The cases in the Workplace Environment Tracking System (WETS) are used to provide reporting on the MD-

715 Report regarding the time it takes to conduct an inquiry into all **allegations of harassment (specific MD-715 question: Part G., C.2.a.5, Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process)**. The purpose of the MD-715 Report is to allow agencies to conduct a periodic self-assessment of their affirmative employment programs and to identify and eliminate barriers that prevent equal employment opportunities in the workplace. Therefore, there is no duplicate reporting of harassment (including sexual harassment) cases to the EEOC, as the two reports serve different purposes.

Additionally, it is not problematic for cases to be in [REDACTED] and WETS without a common identifier because an employee's allegations can be appropriately captured in both systems if in their EEO complaint [REDACTED], they alleged conduct that could be harassment that warrants an Initial Management Inquiry Process or Fact-Finding (WETS). As noted above and discussed in our response to the audit report, the systems serve unique purposes and track different data. A specific employee scenario could rightly warrant being captured in both systems (and potentially the Grievance Arbitration Tracking System as well if there is a grievance associated with the alleged facts). The duplicates do not reflect an error in record keeping. The USPS also stands behind the other concerns it has raised to date with respect to incorporating a common identifier.

Revised Response / Action Plan:

The recommendation status will be changed to "Agreed" in both the OIG's and management's tracking systems.

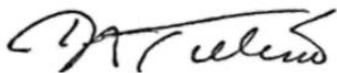
To close the recommendation, management agrees to take the following action:

As recommended by the Equal Employment Opportunity Commission following a technical assistance meeting, management will modify WETS to add a module to track all allegations of harassment. The module will capture information regarding the first two steps of the Publication 552 process—the steps that management must take prior to determining to conduct an Initial Management Inquiry. Those steps are: 1) Respond Promptly, and 2) Obtain Information.

Target Implementation Date—March 30, 2024

Responsible Official: Director, EEO Compliance and Appeals

Sincerely,



Doug A. Tulino

cc: CARM
Thomas J. Blum
Simon Storey
Tracy Wattree-Bond
Marina Dejo-Nicholson