	March 21, 2000	
	YVONNE D. MAGUIRE VICE PRESIDENT, EMPLOYEE RESOURCE MANAGEMENT	
	CRAIG G. WADE VICE PRESIDENT, WESTERN AREA OPERATIONS	
	SUBJECT: Allegation Concerning the Untimely Submission of Injury Claims, Albuquerque District (Report Number HC-MA-00-002)	
	Based on a hotline allegation, we initiated a review to determine whether injury claims were submitted untimely in the Albuquerque District. This report presents the results of our review.	
Results in Brief	The review confirmed that the Postal Service supervisors <sup>1</sup> in the Albuquerque District were submitting injury claims late by an average of 21 days for the 246 injury claims we reviewed. Postal Service guidance states that supervisors	
	should submit injury claims to the Postal Service's injury compensation control offices within 24 hours of receipt from injured employees. We used a 5-day criterion, which the Albuquerque District believed was a reasonable submission timeframe. Late submissions occurred because senior management in the Albuquerque District did not enforce their internal policies and procedures requiring supervisors to timely file injury claims.	

<sup>1</sup>Supervisor is defined to include, acting supervisors (204-bs) and associate supervisory personnel.

	submissions of injury claims delayed injury compensation control office personnel's efforts to manage injury claims to prevent or minimize lost workdays and to control medical costs. In addition, the untimely submission of injury claims by supervisors could represent actions subject to legal remedies to include criminal penalties. <sup>2</sup>
	To correct the deficiencies associated with untimely injury claims, we suggested that Postal Service managers develop policy detailing supervisory responsibilities for processing injury claims and establish sanctions for supervisors who fail to submit injury claims timely. In addition, injury compensation training should be required and conducted for all Postal Service supervisors, including the Albuquerque District. Management agreed with the five suggestions and has either taken or planned corrective actions, which are responsive to the suggestions. Management's comments, in their entirety, are included in Appendix C.
Background	The Code of Federal Regulations, Title 20, Part 10, April 1, 1999, establishes rules applicable to the filing, processing, and payment of claims for workers' compensation benefits under the Federal Employees' Compensation Act. Specifically, Section 10.110(b) states in part that the employer must complete and transmit the injury claim form to the Office of Workers' Compensation Programs (OWCP) within 10 working days [14-calendar days] after receipt of the injury claim form from the
	employee.

<sup>&</sup>lt;sup>2</sup>Under United States Code Title 18 Sec. 1922, an officer or employee of the United States who is charged with the responsibility for making reports and willfully fails, neglects, or refuses to make reports, or induces, compels, or directs an injured employee to forego filing of any claim for compensation or other benefits, or willfully retains any notice, report, claim, or paper which is required to be filed, shall be fined under this title or imprisoned not more than one year, or both. (18 U.S.C. § 1922, 1999 ed.)

office must finalize the processing of the injury claim and mail the injury claim to OWCP within the 14-calendar day timeframe.

	Postal Service Handbook, EL-505, entitled Injury Compensation, dated December 1995, Chapter 1, entitled, <i>The USPS Injury Compensation Program</i> , in the section entitled, <i>Forms and Notices</i> , states that supervisors should submit injury claims Forms CA-1 <sup>3</sup> and CA-2 <sup>4</sup> within 24 hours of receipt from employees. However, for our review, injury compensation personnel in the Albuquerque District's Injury Compensation Control Office (the Control Office) and the audit staff agreed that supervisors should reasonably submit injury claims within 5-calendar days from the date received from the employee. Accordingly, for this review, we used 5-calendar days as the maximum filing time needed and as reasonable criteria for measuring the timeliness of injury claim submissions by supervisors to the Control Office.
Objectives, Scope, and Methodology	Our overall objective was to determine the validity of the compliant submitted to the Office of the Inspector General Hotline. Specifically, we determined whether injury claims were processed and timely submitted to the Albuquerque District's Injury Compensation Control Office in compliance with Postal Service guidance.
	To accomplish our objectives, we interviewed Postal Service and OWCP officials regarding the allegation and we reviewed injury claim records maintained in the Albuquerque District's injury claim database. From our review of the Albuquerque District's injury claim database, we determined that 246 out of 703, Forms CA-1 and CA-2 were submitted later than 5-calendar days and we performed a 100 percent review of those identified claims. Furthermore, we reviewed the OWCP's Time Lag reports <sup>5</sup> for fiscal year (FY) 1999 through the third accounting period of FY 2000 generated from the Postal Service Workers' Compensation Information and Reporting Systems to identify injury claims that were submitted late. Additionally,

<sup>&</sup>lt;sup>3</sup>Injury Claim Form CA-1 entitled, Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation, notifies management of a traumatic injury and serves as the report to the OWCP, when needed. <sup>4</sup>Injury Claim Form CA-2 entitled, Notice of Occupational Disease and Claim for Compensation, notifies management of an occupational illness or disease and serves as the report to the OWCP. when needed.

of an occupational illness or disease and serves as the report to the OWCP, when needed. <sup>5</sup>A management report generated from the Postal Service Workers' Compensation Information and Reporting Systems, using data provided by the OWCP, to track the timeliness of injury claim submissions.

	<ul> <li>we reviewed the Human Resources Information Systems' training database for the Albuquerque District. Specifically, we reviewed the number of injury compensation training courses conducted and attended by supervisors during FY 1999.</li> <li>This review was conducted from, October 29, 1999, through, February 17, 2000, in accordance with the President's Council on Integrity and Efficiency, Quality Standards for Inspections. We also discussed our conclusions and observations with appropriate management officials and included their comments, where appropriate.</li> </ul>
Injury Claim Submissions by Supervisors	Postal Service guidance states that supervisors should submit injury claims to the Postal Service's injury compensation control offices within 24 hours of receipt from injured employees. However, when measuring supervisory performance using the 5-day submission criterion, we found that supervisors in the Albuquerque District were submitting injury claims late by an average of 21 days for the 246 injury claims we reviewed. Late submissions occurred because senior management in the Albuquerque District did not enforce their internal policies and procedures requiring supervisors to timely file injury claims.
	In addition, senior management in the Albuquerque District had not established a mechanism to hold supervisors accountable for the late submission of injury claims. Furthermore, Postal Service policy did not exist to require supervisors, who are an integral part of the injury claim process, to receive injury compensation training. Late submissions of injury claims delayed injury compensation control office personnel's efforts to manage injury claims to prevent or minimize lost workdays and to control medical costs. In addition, the untimely submission of injury claims by supervisors could represent actions subject to legal remedies to include criminal penalties.
Timeliness of Injury Claim Submissions	During the period from FY 1999 through accounting period 3 in FY 2000, we identified 246 out of 703 injury claims input into the Albuquerque District's time lag database that were not submitted timely by supervisors using a greater than 5- day criterion.

The timeliness of injury claim submissions by supervisors who met the 5-day submission criterion<sup>6</sup> (457 injury claim submissions) compared to those supervisors who did not (246 injury claim submissions) is depicted in the following analysis of injury claims chart.



The time delay for the 246 late submissions ranged from 6 to 719 days before the injury claims were submitted to the Control Office. The breakdown of the 246 late submissions was as follows:

- 107 injury claims were submitted in a range of 6 to 7 days;
- 71 injury claims were submitted in a range of 8 to 14 days;
- 44 injury claims were submitted in a range of 15 to 29 days;
- 17 injury claims were submitted in a range of 30 to 90 days; and
- 7 injury claims reflected late submissions of 108, 166, 172, 213, 216, 341, and 719 days, respectively.

<sup>&</sup>lt;sup>6</sup>To measure timeliness, the review team used a 5-calendar day submission requirement rather than a 24-hour submission requirement, as the reasonable time supervisors should submit injury claims received from employees to the Control Office. The Control Office needs to have processing time available to meet the overall 14-day rule imposed by the OWCP.

	We calculated that the 246 injury claims were submitted late an average of 21 days by supervisors in the Albuquerque District, which clearly exceeds the established 14-calendar day filing criterion, by the OWCP. Therefore, any injury claims submitted beyond 5 days by supervisors clearly reduces or prevents the Control Office personnel's ability to meet the 14-calendar day rule imposed by the OWCP.
District Policies and Procedures Regarding Injuries and Accidents	While, Postal Service guidance states that supervisors should submit injury claims within 24 hours, on January 15, 1999, senior management in the Albuquerque District issued a policy memorandum <sup>7</sup> that required all injuries to be immediately reported to the manager of the Control Office as soon as possible but no later than 2 hours after their occurrence or knowledge of their occurrence. The purpose of the policy memorandum was to assist supervisors in processing CA injury claim forms and to avoid lost workday injuries. The memorandum, signed by the Albuquerque District's manager, Human Resources, also provided a pager number for the manager of the Control Office and telephone numbers of all Control Office personnel.
	The manager of the Control Office stated that the call-in responses as required by the policy memorandum were clearly deficient. After issuance of the January 15, 1999, policy memorandum, a report by accounting period <sup>8</sup> was created that reported 59 out of the 246 late submitted injury claims we reviewed. The report showed that only 8 out of 59 injury claims reported were preceded by a telephone call to the Control Office.
	A second policy memorandum <sup>9</sup> dated October 26, 1999, jointly signed by the Albuquerque District's acting district and senior plant managers required supervisory staff to immediately call the manager of the Control Office to report industrial accidents. However, from the date of the policy memo through December 15, 1999, the manager of the Control Office stated that although he could not quantify the number of telephone calls, the call-in response by

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<sup>&</sup>lt;sup>7</sup>See Appendix A for the full text of the January 15, 1999, policy memorandum. <sup>8</sup>The first Time Lag for Injury Claims report was created during FY 1999 as of accounting period three. <sup>9</sup>See Appendix B for the full text of the October 26, 1999, policy memorandum.

	supervisors as required by the policy memorandum was less than anticipated.
Mechanism for Holding Supervisors Accountable for Processing Injury Claim	Although the Albuquerque District had in place policies requiring the early notification of accidents and injuries, we found no evidence that sufficient follow-up was made by senior management to correct the deficiencies associated with the failure of supervisors to comply with district's policy memorandums. In addition, no evidence of corrective actions was identified in the Albuquerque District to ensure that problems with late injury claim submissions by supervisors were corrected. Furthermore, senior management in the Albuquerque District had no mechanism to hold supervisors accountable for the late submission of injury claims.
	During an audit of the Capitol Metro Area, Northern Virginia District, <sup>10</sup> we found that the Northern Virginia Customer Service District's Safety and Health Services Office used a notification letter to inform managers and supervisors of accident reporting discrepancies. The letter stated in part that when managers and supervisors do not comply with established procedures, in order to reiterate accountability, unsatisfactory performance should be documented and appropriate corrective action should be taken. The Northern Virginia District's notification letter was effectively used as a management tool to hold supervisors accountable for failure to perform their required duties.
Injury Compensation Training for Supervisors	During FY 1999, the manager of the Control Office attempted to conduct injury compensation training for all supervisors in the Albuquerque District. However, Postal Service policy does not provide the manager of the Control Office the authority to mandate supervisors to attend injury compensation training. The manager of the Control Office conducted a course entitled and numbered, <u>Injury Compensation: The Supervisor's Role</u> , Course # 21568-00 during FY 1999. The training course was an eight-hour course with two hours focused on safety issues and six hours focused on training supervisors in the proper

<sup>&</sup>lt;sup>10</sup>United States Postal Service, Office of the Inspector General, audit report entitled, <u>Northern Virginia</u> <u>District's Process for Submitting, Controverting, and Challenging Injury Claims</u>, dated September 29, 1999, (Audit Report Number HC-AR-99-001).

procedures for managing and processing injury claims to the Control Office.

During FY 1999, 126 out of 324 Albuquerque District supervisors attended the injury compensation training course. The percentage of supervisors trained compared to the number of supervisors still in need of training is depicted in the following injury compensation training for supervisors chart.



Our review identified 15 supervisors who after attending the injury compensation training course were directly responsible for two or more untimely injury claims representing a total of 37 out of 246 late submissions to the Control Office. In addition, we identified 26 supervisors who did not attend the injury compensation training course and who were directly responsible for two or more untimely injury claims representing a total of 85 out of 246 late submissions to the Control Office. This evidence suggests that training is needed and that training should be repeated.

Postal Service	Postal Service guidance in the EL-505, Chapter 1, states in
Guidance Requiring	part that "the Postal Service Headquarters' manager of
Injury Compensation	Health and Resource Management identify training needs
Training for	for those involved in administering the injury compensation
Supervisors	program." We noted, during our review, the critical role
	supervisors execute in the injury claim process. However,
	Postal Service policy did not require injury compensation
	training for supervisors.

Suggestions	We suggest the vice president, Western Area Operations, prevent late submissions of injury claims by supervisors and acting supervisors within the Albuquerque District, in-part, by directing the acting district manager and senior plant manager to:
	<ol> <li>Issue a district-wide policy detailing supervisor and acting supervisor responsibilities for proper and timely processing injury claims to the Albuquerque District's Injury Compensation Control Office.</li> </ol>
	2. Develop a management tool to hold supervisors and acting supervisors accountable for not executing their injury reporting responsibilities. This management tool should include provisions to address supervisors' and acting supervisors' unsatisfactory performance. In addition, the management tool should provide the manager, Human Resources, in the Albuquerque District with a written copy of the corrective action(s) taken in each instance to prevent future recurrences.
	<ol> <li>Direct the manager, Injury Compensation Control Office, to conduct mandatory training during FY 2000 of all Albuquerque District supervisors and acting supervisors who did not receive such training during FY 1999. In addition, conduct annual refresher training for supervisors and acting supervisors to re-emphasize the proper procedures for timely processing injury claims.</li> </ol>
	<ol> <li>Maintain training records to ensure that supervisors and acting supervisors attend required injury compensation training courses annually.</li> </ol>
Management's Comments	Management agreed with the report and each of the four suggestions and has taken or planned corrective actions.
Evaluation of Management's Comments	Management comments were responsive and the actions taken or planned were appropriate to the issues identified in this report.

Suggestion	We also suggest the vice president, Employee Resource Management:
	<ol> <li>Direct the manager of Health and Resource Management<sup>11</sup> to establish policy and procedures to mandate injury compensation training for all Postal Service supervisors, including annual refresher training.</li> </ol>
Management's Comments	Management agreed that injury compensation training for supervisors is desirable, but management did not agree that such training should be mandatory. Management advised us that the Postal Service only requires two mandatory training classes, Ethics and Sexual Harassment. Management is currently revising the training program for injury compensation professionals and upon its completion will initiate action to revise the supervisors' portion of the injury compensation training program. In the interim, Management stated that it would encourage the injury compensation control offices in the field to update and use the existing supervisor's training program until a new program is available.
Evaluation of Management's Comments	Management comments were responsive and the planned actions should help to correct the training issue identified in this report. We appreciate the cooperation and courtesies provided by your staff during the review. If you have any questions, please contact me at (703) 248-2300.
	Sylvia L. Owens Assistant Inspector General for Revenue/Cost Containment cc: Donna A. Galloway James R. Mercurio John R. Gunnels

<sup>&</sup>lt;sup>11</sup>Formerly known as manager, Safety and Workplace Assistance and previously known as manager, Safety and Risk Management.

# APPENDIX A.

Manager Human Resources

UNITED STATES POSTAL SERVICE

January 15, 1999.

Memorandum to: Plant Manager Postmasters All Supervisors Albuquerque Performance Cluster

Subject: Injury Reporting Procedure - Amended

Effective immediately, all injuries must be reported to the District Injury Compensation Office as soon as possible but no later than 2 hours of their occurrence, or knowledge of their occurrence. The purpose of this requirement is to assist supervisors in processing CA forms and avoiding Lost Workday injuries, (LWI's). You do not need to contact the Safety Office.

The Injury Compensation Staff has been provided a pager to enable you to contact an Injury Compensation Specialist 24 hours a day, 7 days a week. If you page a Specialist at night or on weekends, your page will be immediately returned. The number to call at night/weekends is:

### 1-888-556-0544

Please note that the toll free number referenced above is for the use of Managers, Supervisors and 2048's and is only to be used to report an injury.

To report an injury during normal business hours, 8:00AM to 5:00PM, call the District Injury Compensation Office at **505-346-8795**. Additionally, you can reach the following individuals at these numbers:

Brian Graham	346-8797
Mary Clement	346-8736
Michael Masko	346-8808

It is your responsibility as a Manager to report injuries immediately to the Injury Compensation Staff. The Injury Compensation Staff is ready and able to assist you at all times in managing and controlling injuries.

~e.~  $\mathbf{G}$ James R. Mercurio Manager, Human Resources

cc: District Manager Managers, Post Office Operations

500 Munduterte Avenue NW Suite 900 ALSuduteraute NM 87102-8994 (505) 346-8900 Faar (505) 245-8810

# APPENDIX B.

DISTRICT MARAGER ALBUQUERQUE CUSTOMER SERVICE AND SALES DISTRICT

POSTAL SERVICE

October 26, 1999

SUBJECT: Employee Safety

MEMORANDUM TO: District Direct Reports P&DC Direct Reports Postmasters Station Managers

The accident record in FY 99 was totally unacceptable. In FY 00 in the first six weeks our accident record, as hard as it may be to believe, is worse:

- Motor vehicle accidents: 16 vs. 9 in SPLY.
- Lost workday injuries: 17 vs. 5 in SPLY.
- Total accidents: 75 vs. 28 in SPLY

This cannot continue. The safety of our employees must become a priority immediately.

Problems we see from our perspective in reviewing what we currently are doing:

- Poor decisions by management at time of accident, resulting in lost workdays.
- Narratives in 1769 are inadequate
- Inadequate preventive actions on 1769
- Untimely submission of 1769s
- Inadequate investigations to determine cause of an accident.
- JSA's not created as a result of an accident, nor being used as a discussion item in stand-ups
- Ineffective observations of work and driving practices and an insufficient number of observations to\_correct unsafe work and driving practices

We cannot and will not allow this to continue.

Effective upon receipt of this letter, you are required to inform your supervisory staff of the following procedures:

 District management officials informed of an industrial accident are required to <u>immediately</u> call the Manager, Injury Compensation at

500 MARGUETTE NW SUITE 900 ALEXOLEROUS, NM 87102-9999 605-345-8500 Fro: 505-348-8503 -2-

505/249-0961. He will be available to take your call 24 hours a day/7 days a week. If for any reason you are unable to make contact, you will call Manager; Safety & Health at 505/220-2648 as a back-up. P&DC management officials must <u>immediately</u> call the P&DC Safety Specialist at 505/790-8196. You will follow whatever instructions are provided. They will ask you for information and provide you the best course of action.

- The management official informed of a motor vehicle accident will <u>immediately</u> upon return from the scene call Manager, Safety & Health at 505/220-2648. He will be available 24 hours a day/7 days a week. You will follow whatever instructions are provided. He will ask questions and provide any necessary course of action.
- The installation head (e.g., Postmaster, MDO, Maintenance Manager) will meet with the unit manager or supervisor by no later than the following workday from the day the accident was reported to management. The installation head will review all appropriate documents including the CA-1, completed 1769, 1700, PS Form 91, and five-year-history. The installation head will sign the higher level block on the 1769 and ensure it is received in Safety (Plant or District) by no later than the following workday. If mailed, you will call and confirm receipt. If not received, you will fax copies. Make certain you keep copies of paperwork you intend on mailing. P&DC management officials will provide completed accidents kits to the P&DC Safety Specialist for review.

By no later than Friday or Saturday every week, the installation head will meet with the employee and employee's supervisor. The meeting is for the purpose of reviewing the accident and evaluating the effectiveness of the unit's safety program and procedures.

At a minimum, the following questions are required to be asked:

- When was your last safety talk?.
- a Has there been a safety talk or is one planned on your accident?
- How effective in your view are safety talks? How can they be improved?
- Do employees participate during safety talks?
- Q When was your last safety observation?
- g Were results discussed with you?
- a How are you reminded or encouraged of the importance of working safely?
- a How can we prevent you or any other employee from having a similar accident?

-3-

a Determine type of remedial training employee will receive.

Ensure the meeting during the review with the employee is not a fact-finding session and that information from the meeting is not used as a basis for discipline. Fact-finding meetings need to be held separately by the supervisor and before meetings with the installation head. Fact-finding meetings may result in discipline and the employee has a right to have a union official present.

These <u>required</u> procedures all deal with after-the-fact situations. We must do the things necessary to prevent the accident and all the procedures that come with it. Increased work and driving observations to identify and correct unsafe practices is the ideal situation. Unit managers with accident problems need to identify type of accidents they're having, then require extensive observations in those particular areas.

We cannot allow our current situation to continue. Whatever you're doing is not working if your unit is having accidents. We cannot allow that. These procedures are our attempt to change the trend. It is unfortunate but our record leaves no choice. You may add additional action items you feel are necessary.

We will expect the procedures to be put in place and be followed. We will put in a system to track compliance.

Let's reverse the course we're on. Let's show our employees we're serious about safety in our work environment,

Mánager

Kenneth R. Billings Senior Plant Manager

## APPENDIX C.

HUMAN RESOURCES WESTERN AREA



March 1, 2000

Sylvia L. Owens Assistant Inspector General For Revenue/Cost Containment 1735 N Lynn St. Arlington, VA 22209-2020

Subject: Transmittal of Draft Management Advisory Report – Allegation of Untimely Submission of Injury Claims, Albuquerque District (Report Number HC-MA-00-DRAFT)

The Western Area submits the following information in response to your request of February 17, 2000 for agency comments. We will address the Advisory Report Draft comments by subject title as depicted in the Draft.

#### Background

Regulations for timely reporting claims - No Comments - Agree

**Objective, Scope and Methodology** 

Hotline Complaint - injury claims are not being timely submitted

Agency Response: Agree with finding.

The Westem Area and the Albuquerque Cluster began efforts to improve the clusters claims reporting time requirements, and identify problems causing delayed claims processing, in November 1998 at the request of the Dallas OWCP office. An Excel spreadsheet was designed to be used as a tool to track claims processing from the beginning point with the injured worker, to the supervisor, to Injury Compensation and finally to OWCP. It was discovered in November 1998 that there was a time lag issue generally caused by delays in receiving completed claims forms Supervisors. As a result of this analysis, the Albuquerque cluster initiated an action plan as described in their November 20, 1998 memo to the Area office (attached). The OIG hotline complaint was received sometime after this date but before October 1999. The cluster Excel spreadsheet is the "injury claim database" referenced in the Draft report on page 3 and was the source of the claims identified in the OIG Draft. We would agree that the tracking data shows untimely submissions of claims from postal supervisors to the Injury Compensation office in a number of the claims and have no reason to question the numbers given in the OIG report (246 out of 703)

#### Injury Claim Submissions by Supervisors

Findings:

 Supervisors in the Albuquerque District were submitting injury claims late by an average of 21 days for the 246 injury claims reviewed.

1745 Stout St Ste 600 Denver CO 80299-4000 303-313-5020 Fax 303-313-5021



- Senior management in the Albuquerque district had not established a mechanism to hold supervisors accountable for the late submission of injury claims
- Postal Service policy did not exist to require supervisors, who are an integral part of the injury claim process, to receive injury compensation training.

Agency Response: Agree with finding.

The Manager of Human Resources advises that while there was a process put in place to identify supervisors who contributed to a delayed claim, there was no formal feedback process implemented which would require a reply from operations concerning corrective actions taken. Effective January 2000, this problem has now been addressed by the Albuquerque cluster.

To our knowledge, there is, at present, no written agency wide requirement that supervisors receive any given amount of structured injury compensation training.

#### **Draft Advisory Suggestions:**

 Issue a district-wide policy detailing supervisor and acting supervisor responsibilities for proper and timely processing of injury claims to the Albuquerque District's Injury Compensation Control Office.

Agree, Actions taken: The cluster advises that the cluster-wide policy was issued on 10/26/99 and reissued on 01/27/00 to include the penalty statement.

 Develop a management tool to hold supervisors and acting supervisors accountable for not executing their injury reporting responsibilities...

Agree, Actions taken: The cluster advises that weekly notifications to operations are being issued by the Manager, Human Resources. Responses are being received in a timely manner. The responses describe what corrective action is being taken. The number of late submissions have decreased and the few late submissions being received are typically late by only a few days, rather than the weeks previously experienced.

3. Direct the manager, Injury Compensation Control office to conduct mandatory training during FY 2000 of all Albuquerque District supervisors....

Agree, Actions Planned: The Albuquerque Manager of Human Resources advises in his report dated January 12, 2000 (item 12) that a 4 hour training session will be presented by 4/28/00.

 Maintain training records to ensure that supervisors and acting supervisors attend required injury compensation training courses annually.

Agree. Albuquerque advises that training records are being maintained to document the IC training.

 We also suggest the vice president, Employee Resource Management: Direct the manager of Health and Resource Management to establish policy and procedures to mandate injury compensation training for all Postal Service supervisors, including annual refresher training.

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Western Area agrees with the recommendation for injury compensation training for postal supervisors

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Craig G. Wade Vice President Western Area Operations

Cc: Donna A Galloway, Area Manager, Human Resources Finance Liaison, National Accounting, HQ, Finance YVONNE D. MAGUIRE Vice President Employee Resource Management



March 8, 2000

SYLVIA L. OWENS

SUBJECT: Transmittal of Draft Management Advisory Report - Allegation of Untimely Submission of Injury Claims, Albuquerque District (Report Number HC-MA-00-DRAFT)

This responds to your request that we comment on suggestion number five of the above referenced report dated February 17 which states:

Direct the Manager of Health and Resource Management to establish policy and procedures to mandate injury compensation training for all Postal Service Supervisors, including annual refresher training.

We agree with your suggestion that injury compensation training for supervisors is desirable, but we do not agree that it should be made mandatory. Circumstances regarding the competencies covered in that training vary from district to district. Moreover, there is training material available. The course "Supervisor's Roles and Responsibilities," though somewhat outdated, can be updated locally with current OWCP forms and presented to first line supervisors, when deemed necessary. As indicated in your report, the primary reasons for late submission of claims in the Albuquerque District were senior management's failure to enforce their internal reporting procedures and the lack of a tracking system to hold supervisors accountable.

We are presently revising the training program for injury compensation professionals and upon its completion will initiate action to revise the supervisor's training program. In the interim, we will encourage the field to update and use the existing supervisor's program until a new program is available.

Thank you for the opportunity to comment on this report.

Donna Meak

€rYvonne D. Maguire

cc: Donna A. Galloway John R. Gunnels

475 L'ENFANT PLAZA SW WASHINGTON DC 20260-4200 Major Contributors to The Report