

October 16, 2007

JERRY D. LANE VICE PRESIDENT, CAPITAL METRO AREA OPERATIONS

SUBJECT: Audit Report – The Postal Service's Violence Prevention and Response Programs in Three Capital Metro Area Performance Clusters (Report Number HM-AR-08-001)

This report presents the results of the U.S. Postal Service Office of Inspector General's (OIG) self-initiated audit of the Postal Service's violence prevention and response programs in three Capital Metro Area Performance Clusters (PC) (Project Number 06YG044HM000). The Capital Metro Area was one of five areas judgmentally selected from the nine Postal Service areas of operation. Our overall objective was to determine if the violence prevention and response programs in the Capital, Greater South Carolina, and Richmond PCs effectively reduced the potential for violence. Specifically, we determined whether (1) the PCs implemented required controls (policies and procedures) to reduce the potential for violence and (2) oversight of the workplace violence prevention program at the area and PC levels was adequate.

This report is the first in a series of six reports we will issue on the violence prevention and response programs in 15 PCs. The sixth report will summarize the conditions reported in the 15 PCs, management's actions to correct the conditions, and issues identified with nationwide impact.

We concluded the Capital, Greater South Carolina, and Richmond PCs established threat assessment teams (TAT) and took some positive steps to reduce the potential for violence such as conducting climate assessments and Voice of the Employee (VOE)² focus groups. However, the PCs' violence prevention and response programs may not be fully effective in reducing the potential for violence because the district and plant managers (PC managers) and the TATs did not implement many of the required policies and procedures to reduce the potential for violence. In addition, Capital Metro Area and PC managers did not provide adequate oversight of the violence prevention and response programs to ensure compliance with policies and procedures.

¹ The five areas reviewed were Capital Metro, Northeast, Pacific, Southeast, and Southwest.

² The VOE Survey is a data collection instrument used to obtain information from career employees regarding how they feel about their workplace environment. The Postal Service uses this information in a number of ways, to include ensuring employees feel safe in their workplaces.

This report includes 12 recommendations to help the Capital Metro Area, its PCs, and TATs improve the effectiveness of the violence prevention and response program. Implementation of these recommendations will 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 implemented all 12 recommendations and the actions taken should correct the issues identified. Management's comments and our evaluation of these comments are included in the report.

Background

The Postal Service has long recognized the importance of ensuring the safety of its employees by creating and maintaining a work environment that is violence-free. In addition, the agency is obligated under the Occupational Safety and Health Administration's (OSHA) "General Duty" clause to provide a safe and healthful working environment for all workers covered by the Occupational Safety and Health Act (the OSH Act) of 1970. To prevent violence in the workplace and minimize the potential risk the Postal Service established the following criteria:

- The Administrative Support Manual (ASM) requires security control officers or their designees to conduct annual facility security reviews.
- The Joint Statement on Violence and Behavior in the Workplace (Joint Statement) signed by union and management association presidents and the Deputy Postmaster General in 1992 states the Postal Service will not tolerate violent and inappropriate behavior by anyone, at any level. (See Appendix B for a copy of the Joint Statement.)
- The Threat Assessment Team Guide (Publication 108) requires TATs to assess and respond to violent and potentially violent situations. The guide outlines six strategies designed to assist the TATs: (1) selection, (2) security, (3) communication of policy, (4) environment and culture, (5) employee support, and (6) separation.

The strategies are an integral part of the Postal Service's *Strategic Transformation Plan 2006 - 2010* which identifies engaging and motivating the workforce as one of its goals. A key transformation strategy for achieving this goal is maintaining a safe work environment for all employees. This audit reviewed implementation of three of the six strategies — security, communication of policy, and environment and culture.

Objective, Scope, and Methodology

We discuss our objective, scope, and methodology in detail in Appendix C.

Prior Audit Coverage

We discuss prior audit coverage in Appendix D.

Results

The following summarizes our findings and recommendations regarding the Capital, Greater South Carolina, and Richmond PCs' violence prevention and response programs. Additional details regarding our findings are in Appendix E.

Security Strategy — Ensure appropriate safeguards for employees, customers, and property.

The three PCs did not consistently ensure that facilities had appropriate security safeguards in place and that employees complied with them. Our March 2007 report disclosed management needed to make improvements to protect employees, customers, the mail, and critical assets.³

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

The Capital Metro Area took corrective action prior to and after issuance of our March 2007 report. We are making no recommendations in this area since management's corrective actions addressed the security issues.

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

Zero Tolerance Policy Postings Could be Improved

The three PCs disseminated copies of their current local zero tolerance policy to all PC employees in FY 2006 through stand-up talks, new employee orientation classes, and mailings. However, management could improve their procedures for posting their zero tolerance policy, which sometimes was not posted at all, was not visible, or was outdated at some facilities we visited.

Properly posting the zero tolerance policy may reduce the potential for violence in the workplace. For example, visibly posting the current policy makes important information available on the workroom floor, where employees may need it most.

³ Postal Service Security Controls and Processes for the Capital Metro Area (Report Number SA-AR-07-002, dated March 30, 2007).

Corrective Action

As a result of this audit, the Greater South Carolina District Human Resources (HR) manager instructed all facility managers to immediately post the current zero tolerance policy in their facilities.

Recommendation

We recommend the Vice President, Capital Metro Area Operations:

 Direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to implement an internal control to ensure their current zero tolerance policy is properly posted in all facilities, at least annually. For example, facility managers could provide written annual certifications to the performance cluster threat assessment teams.

Workplace Violence Awareness Training Needed for Some Employees

The Capital, Greater South Carolina, and Richmond PC and HR managers ensured most employees and TAT core members⁴ received the required training. However, the HR managers did not ensure all managers, supervisors, and 204b supervisors⁵ received the required 8-hour (one-time) workplace violence awareness training.

Postal Service employees who do not receive this training may not be effective in recognizing, preventing, and responding to violent and potentially violent situations. For example, the Greater South Carolina District's March 2006 TAT minutes indicate some

Recommendations

We recommend the Vice President, Capital Metro Area Operations:

- 2. Notify the Capital, Greater South Carolina, and Richmond Performance Cluster managers that workplace violence awareness training is a fiscal year mandatory requirement, and it is their responsibility to ensure training occurs, preferably during non-peak operational periods.
- 3. Direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to determine which managers, supervisors, and 204b supervisors have not received the 8-hour (one-time) workplace violence awareness training, and provide the training as soon as possible.

⁴ TAT core members include 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.

⁵ A 204b supervisor is a bargaining employee detailed to an acting supervisor position.

- 4. Instruct the Capital, Greater South Carolina, and Richmond District managers to:
 - Remind Human Resources managers of their responsibility to conduct periodic reviews (at least quarterly)⁶ to determine if management has met the mandatory workplace violence awareness training requirements for all employees (including 204b supervisors).
 - Implement a control to ensure Human Resources managers conduct periodic reviews to determine which managers and supervisors did not receive the violence awareness training.

Strategies to Enforce Postal Service Policy Not Fully Implemented

The Capital, Greater South Carolina, and Richmond TATs did not fully implement violence prevention strategies to ensure incidents of violent and inappropriate behavior were fully addressed in accordance with the TAT Guide. We identified 58⁷ incidents reported to the three TATs in FY 2006 and determined these incidents were not properly addressed in accordance with the TAT Guide.

Opportunities to prevent a violent incident from occurring diminish when management does not fully implement violence prevention strategies to properly address potentially violent incidents. In addition, management needs to appropriately and immediately respond to potentially violent incidents. For example, VOE Survey quarterly reports for the three PCs indicate many employees were concerned they were working in an unsafe environment and could be victims of physical violence.

Recommendations

We recommend the Vice President, Capital Metro Area Operations:

- 5. Remind the Capital, Greater South Carolina, and Richmond Performance Cluster managers of their responsibility to ensure threat assessment teams comply with the *Threat Assessment Team Guide* when responding to and resolving incidents of violent and inappropriate behavior.
- 6. Direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to implement a control to ensure threat assessment teams comply with the *Threat Assessment Team Guide* when responding to and assessing reports of potentially violent situations and inappropriate behavior.
- 7. Direct the Capital, Greater South Carolina, and Richmond threat assessment teams to review the incidents that had insufficient supporting documentation and determine if they were resolved in accordance with the *Threat Assessment Team Guide*.

⁶ Quarterly reviews would provide sufficient time to schedule employees for training within the fiscal year it is

⁷ We reviewed 34 Capital Metro, 17 Greater South Carolina, and seven Richmond PC incidents.

Environment and Culture Strategy — Create a work setting and maintain an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.

Monitoring and Evaluating Workplace Climate Indicators

The three PC HR managers took positive steps toward creating an atmosphere perceived to be fair and free from unlawful and inappropriate behavior. For example, they disseminated zero tolerance policies to all employees and provided some formal employee training. The HR managers also monitored and evaluated VOE Survey scores and focus groups, numbers of grievances and Equal Employment Opportunity (EEO) complaints, Employee Assistant Program (EAP) referrals data, and Flash Reports⁸ to identify events that could escalate the potential for violence. However, the managers did not document how (or how often) they monitored and evaluated climate indicators, other than their quarterly monitoring and evaluation of the VOE Survey results.

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

In addition, we reviewed 31 complaints the OIG Hotline received during FY 2006 and found that some employees in these PCs reported workplace environment issues. Some of these employees sent their workplace environment complaints to the OIG because they believed they had exhausted all avenues for resolution in their workplace. We believe employees could view work sites where management proactively moderates the risk of violent situations as the agency's commitment to the zero tolerance policy.

Recommendation

We recommend the Vice President, Capital Metro Area Operations:

8. Direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to ensure the threat assessment teams document their evaluations of climate indicators to identify trends and potential hotspots.

⁸ A Flash Report is an operations report for a specific facility that shows workhour usage, productivity, sick leave, and overtime rates for that facility.

Team Process and Performance Measures Could be Improved

TAT Members, Meetings, and Minutes

The three TATs had the requisite number and type of team members. However, the TATs did not consistently conduct quarterly meetings, prepare meeting minutes, and disseminate minutes to the required TAT members, per the TAT Guide. A TAT not conducting and properly documenting meetings runs the risk of not achieving the TAT's primary mission — preventing workplace violence.

Corrective Action

The Postal Service Headquarters EAP/Workplace Environment Improvement (WEI) Office established a web-based TAT Membership and Meeting Tool to ensure management conducts and documents TAT meetings, and disseminates meeting minutes in accordance with the TAT Guide. Effective March 2007, each PC is required to timely update the information for their TAT.

Recommendation

We recommend the Vice President, Capital Metro Area Operations, direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to:

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

TAT Performance Measures

The Capital, Greater South Carolina, and Richmond HR managers stated they implemented performance measures such as verbal feedback from employees to gauge whether the TATs were successful or needed to change their processes. However, management did not document the measures and the measures may not be adequate. Specifically, TATs cannot provide assurance that their efforts to prevent violent incidents in the workplace were successful or needed improvement. In addition, using the primary measures suggested in the TAT Guide may provide more useful information to identify areas for TAT improvement.

Recommendation

We recommend the Vice President, Capital Metro Area Operations, direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to:

⁹ The Postal Service modified the TAT Guide in March 2007 to require meetings twice a quarter.

10. Implement controls to ensure threat assessment teams document the processes used to measure the team's performance, as required by the *Threat Assessment Team Guide*, and ensure the measurements used are adequate for determining success and identifying areas for improvement.

Oversight of the Workplace Violence Prevention Program

Our review of TAT activities indicates the Capital, Greater South Carolina, and Richmond PC and Capital Metro Area HR managers did not provide adequate oversight of the violence prevention and response programs. The PC managers did not ensure the three TATs implemented many of the required policies and procedures to reduce the potential for violence related to security, communication of policy, and the environment and culture. The PC and HR managers also did not ensure TATs followed appropriate processes and documented performance measures.

In addition, the former Capital Metro Area HR manager did not ensure the three PCs fully implemented the workplace violence prevention program even though the OIG recommended improvements to the Greater South Carolina and Richmond programs on November 30, 2000.¹⁰

Adequate oversight at the area and PC levels could reduce the potential for violence. Specifically, when TATs do not follow important workplace violence prevention and response program policies and procedures, the teams may not be fully effective in reducing the potential for violence.

The internal controls recommended in this report for the Capital, Greater South Carolina, and Richmond PC managers, if implemented, should provide sufficient oversight of the TATs at the PC level. As a result, we have no additional recommendations for PC managers regarding communication of policy and environment and culture strategies.

Corrective Action

During the course of our audit, the Capital Metro Area hired an additional HR analyst to ensure the area's compliance with the Postal Service's policies and procedures for reducing the potential for violence in the workplace.

Recommendations

We recommend the Vice President, Capital Metro Area Operations:

11. Implement an internal control to ensure Capital Metro Area Performance Cluster managers provide adequate oversight of their threat assessment teams to improve

¹⁰ Review of the Violence Prevention and Response Programs in the Greater South Carolina District (Report Number LB-AR-01-009, dated November 30, 2000) and Review of the Violence Prevention and Response Programs in the Richmond District (Report Number LB-AR-01-008, dated November 30, 2000).

the effectiveness of the violence prevention and response programs. For example, performance cluster managers could provide the Area Vice President with an annual certification that the teams are conducting business in accordance with the *Threat Assessment Team Guide* and related Postal Service policies.

12. Determine if the findings in this report exist in the remaining Capital Metro Area Performance Clusters – Baltimore, Greensboro, Mid-Carolina, and Northern Virginia – and, where necessary, take action to ensure management implements adequate controls.

Management's Comments

Management agreed to implement all 12 recommendations in the report and provided a copy of a September 24, 2007, memorandum from the Vice President, Capital Metro Area Operations. The memorandum provided a list of the strategies that all Capital Metro Area District and HR Managers are required to follow to reduce workplace violence. The memorandum also requires the managers to submit an annual certification, beginning November 19, 2007, to confirm the TATs are conducting business in accordance with the TAT Guide.

Management also agreed that any improvement in the workplace environment can improve the Postal Service's reputation (goodwill), and stated they had no basis for disagreement with the non-monetary impact.

Management was not clear, however, as to their agreement or disagreement with the findings. For example, management implied that posting the current zero tolerance policy was not a headquarters requirement and therefore the PCs' actions to post the policy went beyond the TAT Guide requirements. Management agreed, however, to ensure the policy was properly posted. Management's comments, in their entirety, are included in Appendix I of this report.

Evaluation of Management's Comments

Management's comments are responsive and the actions taken should correct the issues identified in the findings. In addition, the OIG considers management's September 24, 2007, memorandum as sufficient documentation to close significant recommendations 1 through 4, 6 through 8, and 10 through 12.

We requested that management clarify their response regarding their agreement or disagreement with the findings. Management responded, however, they noted the areas of disagreement in their original response and did not provide further clarification.

The Postal Service's Violence Prevention and Response Programs in Three Capital Metro Area Performance Clusters

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 Anthony J. Vegliante Doug A. Tulino Mary A. Hopkins Sandra J. Savoie Katherine S. Banks

APPENDIX A. ACRONYMS

ASAP Area Security Assessment Program
ASM Administrative Support Manual
EAP Employee Assistance Program
EDR Evaluate, Discuss, Recognize
EEO Equal Employment Opportunity
FOIA Freedom of Information Act
FSS Facility Security Surveys

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

WebEIS Web-Enabled Enterprise Information System

WEI Workplace Environment Improvement

WIA Workplace Improvement Analyst

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

M-01242

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.

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APPENDIX C. OBJECTIVE, 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 Capital, Greater South Carolina, and Richmond PCs implemented required controls (policies and procedures) to reduce the potential for violence and (2) the level of oversight of the workplace violence prevention program at the area and PC levels was adequate.¹¹

To evaluate the workplace violence prevention and response programs in the Capital Metro Area, we judgmentally selected the Capital, Greater South Carolina, and Richmond PCs from the seven PCs in the Capital Metro Area. We selected these PCs based on an analysis of seven workplace environment climate indicators for FYs 2004 through 2006. 12 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 list¹³ and whether the OIG conducted prior workplace environment audits in the PC. Finally, we included PCs where the OIG 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.

We interviewed the PCs' HR, Labor Relations, and Training managers; the WIA; and the area's HR manager and analyst to determine whether (1) the selected PCs had implemented required controls to reduce the potential for violence and (2) Postal Service internal controls existed to provide adequate oversight of the program at the area and PC levels. We also reviewed the TAT meeting minutes and reports used to monitor and enforce polices and procedures to reduce violence in the workplace. In addition, we reviewed the TAT Guide, the ASM, the Joint Statement, and the OSHA "General Duty" clause to provide a safe and healthful working environment for all workers covered by the OSH Act of 1970.

We reviewed the following data and information pertaining to the PCs' activities related to the violence prevention and response program:

- Zero tolerance policies and action plans.
- VOE Vital Few List.¹⁴
- Attendance records for required workplace violence awareness training.
- TAT incident reports and responses.

¹¹ We will address oversight at the headquarters level in a separate report.

The seven climate indicators are the VOE Survey scores, grievances, EEO complaints, EAP referrals, climate assessments, OIG Hotline complaints, and OIG congressional inquiries regarding workplace environments.

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

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

The Postal Service's Violence Prevention and Response Programs in Three Capital Metro Area Performance Clusters

- Safety talks and direct mailings related to the zero tolerance policies and action plans.
- Existence of TAT Hotline numbers.
- 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.
- Area Security Assessment Program (ASAP)¹⁵ review results.

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

We conducted this performance audit from October 2006 through October 2007 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management officials on July 23, 2007, and included their comments where appropriate.

¹⁵ 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.

¹⁶ 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

Two OIG reports stated required controls were not fully implemented to reduce the potential for violence in the Richmond and Greater South Carolina Districts. These reports are the Review of the Violence Prevention and Response Programs in the Greater South Carolina District (Report Number LB-AR-01-009, dated November 30, 2000) and the Review of the Violence Prevention and Response Programs in the Richmond District (Report Number LB-AR-01-008, dated November 30, 2000). The reports also stated management could improve the districts' ability to respond to crises. Although the districts generally complied with the TAT Guide when reacting to incidents of violence, they did not comply with other violence prevention requirements. Specifically, the districts did not conduct annual physical security reviews at all district facilities, monitor and evaluate climate indicators, provide the required 2-day orientation training for all TAT members, or engage in case management for all threats that occurred within the districts. They also did not measure TAT team performance, mandate violence awareness training, develop a back-up plan for external support, or ensure that all facilities had local, customized crisis plans on site. We recommended the Area Vice President direct the Richmond and Greater South Carolina District managers to implement controls to improve the effectiveness of the districts' violence prevention programs and strengthen the districts' ability to respond in a crisis. Management generally concurred with the recommendations.

The OIG report titled *Postal Service Security Controls and Processes for the Capital Metro Area* (Report Number SA-AR-07-002, dated March 30, 2007) concluded the Postal Service and the Postal Inspection Service have opportunities to improve security controls and processes to more effectively and efficiently protect employees, customers, the mail, and critical assets. Specifically, responsible security personnel did not always conduct Facility Security Surveys (FSS) accurately and annually, as required. In addition, security personnel did not always sufficiently address and resolve FSS deficiencies, 67 percent of security personnel did not receive security control officer training, and management did not effectively assess security operations to identify areas for improvement. Management agreed with four of our recommendations and partially agreed with the fifth recommendation.

The OIG report titled *Postal Inspection Service Security Controls and Processes - Area Security Assessment Program* (Report Number SA-AR-07-004, dated July 10, 2007) indicated that management did not effectively and efficiently use the ASAP to assess Postal Service security and compliance with security policies and procedures. Specifically, management developed and implemented the national standardized ASAP without guidance or approval from the Postal Inspection Service, which has primary responsibility for security at the Postal Service. As a result, Postal Service management used its own personnel to conduct ASAP reviews, the results of which the Postal Inspection Service did not take into account when assessing security operations.

¹⁷ The FSS is an in-depth checklist of 273 yes/no questions covering various areas of security. Postal Service and Inspection Service security officers in the field complete the survey annually.

The Postal Service's Violence Prevention and Response Programs in Three Capital Metro Area Performance Clusters HM-AR-08-001

Additionally, Postal Service management expended approximately \$144,000 on the ASAP database, however, the information in the database was not reliable. We recommended and management agreed to discontinue the use of the ASAP given that the Postal Inspection Service does not use the results to assess security operations in the Postal Service, and it is similar to security reviews the Postal Inspection Service currently performs.

APPENDIX E. CAPITAL, GREATER SOUTH CAROLINA, AND RICHMOND PERFORMANCE CLUSTERS' CONDITIONS AND CAUSES RELATED TO AUDIT OBJECTIVES

Objective 1 – Determine if the PCs implemented required controls (policies and procedures) to reduce the potential for violence.

	violence.			
1. Securi	ty Strategy - Ensure appropriate safeguards for employees, customers, and property.			
Condition	PCs did not consistently ensure appropriate security safeguards were in place and complied with at many facilities.	Х	X	Х
	Security personnel did not establish internal or management controls requiring FSS approval to ensure accuracy and timeliness.	Х	Х	Х
	Security personnel did not always conduct FSSs annually.	Х	✓	X
	Security personnel did not always sufficiently address and resolve FSS deficiencies.	Х	X	Х
	67 percent of security personnel did not receive security control officer training.	Х	X	X
	Management did not effectively assess security operations to identify areas for improvement.	Х	Х	Х
Cause	Management did not establish consolidated standard operating procedures and guidance.	X	X	X
	Management did not implement appropriate internal and management controls.	Х	Х	Х
	Management did not require installation heads to certify they had corrected deficiencies.	Х	Х	Х
regard	unication of Policy Strategy – Consistently communicate and enforce Postal Service policy ing violent and inappropriate behavior.			
Condition	PCs disseminated FY 2006 current local zero tolerance policies to all PC employees through stand-up talks, new employee orientation classes, and mail outs.	✓	✓	✓
	PC implemented a centralized TAT Hotline number.		✓	
	Some communication improvements are needed.	Х	Χ	Х
	The zero tolerance policy was not posted in three of the nine facilities visited.	X	✓	Х
	The zero tolerance policy was not visible in two of the six facilities that posted it.	✓	X	✓
Nata: V:	The zero tolerance policy was not current in three of the six facilities that posted it.	X	X	✓

Note: X indicates the PC was not in compliance, and the cause for non-compliance.

[√] indicates the PC was in compliance. no symbol indicates not applicable.

	munication of Policy Strategy (Continued) – Consistently communicate and enforce Postal ce policy regarding violent and inappropriate behavior.			
Cause	Facility managers not aware of the requirement to post and/or ensure the zero tolerance policy is visible.	Χ	X	X
Jause	Facility manager did not receive a copy of the policy.	X		
	Tracility manager did not receive a copy of the policy.	^		
Condition	Workplace violence awareness training needed for some employees.	Х	Χ	X
	HR managers ensured most employees (26,816) and TAT core members received the required training.	✓	✓	✓
	PC and HR managers did not ensure all managers, supervisors, and 204b supervisors received the required 8-hour (one time) workplace violence awareness training.	Х	Х	Х
Cause	HR manager did not periodically review the NTD exception reports to determine the names of the managers and supervisors that did not receive the training.			Х
	PC and HR managers cancelled violence awareness training due to operational needs.	X		
	*Numbers and locations of 204b supervisors not known, making it difficult for HR manager to track their training.		Χ	
	*NTD exception reports for 8-hour course identified all employees as non-bargaining (including secretaries, technicians, and other non-managers). This made it difficult to discern which managers, supervisors, and 204b supervisors had not received training.	х	Х	х
	*The NTD does not identify 204b supervisors separate from their bargaining employee identification.	Х	X	X
	*HR manager did not schedule training because the Headquarters list of FY 2006 mandatory training requirements did not contain the course.			Х
Condition	TATs did not fully implement violence prevention strategies to ensure incidents of violent and inappropriate behavior were fully addressed in accordance with the TAT Guide.	Х	Х	Х
	58 incidents reported to TATs in FY 2006 were not properly addressed.	Х	Х	X
	> 58 did not receive proper case management (including documenting the assessment of the risk level) ¹⁸ and were not monitored and tracked to ensure resolution.	Х	Х	Х
	39 had insufficient (or no) documentation which prevented us from determining how they were addressed and resolved (19 did).	Х	Х	Х
	> 38 had no documented risk abatement plans (20 did).	Х	Х	X
	> 11 were not immediately and firmly respond to 19 (eight were).	Х	Х	X
	Incident tracking logs not maintained to show when the 58 incidents were reported and resolved.	Х	Χ	X

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

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.

19 For example, the Greater South Carolina TAT's March 2006 minutes

Cause	egarding violent and inappropriate behavior. HR managers did not fully understand the importance of TAT responsibilities.	Χ	Χ	Х
Juuse	HR managers believed that, despite findings on 58 incidents, TATs handled incidents appropriately.	X	X	X
	HR managers informally assessed incidents or designated WIAs to determine the priority risk levels.	X	X	X
	HR managers believed TAT requirement to track incidents and resolutions was a suggestion.		X	X
	The acting WIA did not have access to all the incident case files. ²⁰			X
	The WIAs believed discussing incidents during TAT quarterly meetings replaced the need to maintain a tracking log.		Х	X
	The WIA believed the TAT did not properly maintain an incident tracking log due to turnover of the HR manager and secretary positions during FY 2006.	Х		
3. Enviro	nment and Culture Strategy – Create a work setting and maintain an atmosphere			
perceiv	red to be fair and free from unlawful and inappropriate behavior.			
Condition	HR managers took positive steps toward creating an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.	✓	✓	✓
	HR managers used VOE Survey results, grievances, EEO complaints, and EAP referrals as climate indicators to identify and follow up on events that could escalate the potential for violence.	✓	✓	✓
	HR managers assisted facility managers in developing action plans for improving low VOE Survey scores.	✓	✓	✓
	Some improvements are needed.	Х	X	Х
	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 the VOE Survey results.	Х	Х	Х
Cause	HR managers considered evaluations of the VOE Survey results sufficient documentation of workplace climate indicators.	X	Χ	Х
Condition	TATs did not consistently conduct quarterly meetings, properly prepare meeting minutes, and disseminate minutes to required TAT members.	X	X	Х
	TATs had the requisite number and type of team members required by the TAT Guide.	✓	✓	✓
Cause	The former HR manager was not knowledgeable of TAT responsibilities and how the team should operate.	Х		
	The HR manager believed the team complied with TAT guidelines although it may not have followed the guidelines word-by-word. ²¹			Х
	The WIA believed that due to the former HR manager's terminal illness, the TAT process may have been limited, but the guidelines were complied with.		Х	

²

The Richmond PC manager told us the TAT now meets twice quarterly and minutes are prepared and disseminated in accordance with the TAT Guide.

	nment and Culture Strategy (Continued) – Create a work setting and maintain an atmosphere			
perceiv	ved to be fair and free from unlawful and inappropriate behavior.			
Condition	Measures to gauge TATs' success were not documented and may not have been adequate.	X	Χ	Х
	TAT informally obtained verbal feedback from employees, used Evaluate, Discuss, Recognize (EDR) ²²	√		
	process, and VOE Survey scores and focus groups.	ŕ		
	TAT informally conducted after action reviews, used VOE Surveys, and flash reports.		✓	
	 TAT used VOE Surveys, focus groups, town hall meetings, suggestion boxes, and the EDR process. 			✓
	TAT did not document informal measurements.	Х	X	X
Cause	TATs believed the informal measures accomplished the intended purpose.	Х	Х	X
Objective	 2 – Determine the adequacy of oversight of the workplace violence prevention pr at the area and PC levels. 	ogram		
	at the area and PC levels.	ogram ———		
Oversight	at the area and PC levels. of the Workplace Violence Prevention and Response Program PC and former area HR managers did not provide adequate oversight of the violence prevention and response	ogram ×	X	X
Oversight	at the area and PC levels. of the Workplace Violence Prevention and Response Program PC and former area HR managers did not provide adequate oversight of the violence prevention and response programs.		X	X
	at the area and PC levels. of the Workplace Violence Prevention and Response Program PC and former area HR managers did not provide adequate oversight of the violence prevention and response		X X	X
Oversight	at the area and PC levels. of the Workplace Violence Prevention and Response Program PC and former area HR managers did not provide adequate oversight of the violence prevention and response programs. • PC managers did not ensure TATs implemented many required policies and procedures to reduce the	Х		
Oversight	at the area and PC levels. of the Workplace Violence Prevention and Response Program PC and former area HR managers did not provide adequate oversight of the violence prevention and response programs. • PC managers did not ensure TATs implemented many required policies and procedures to reduce the potential for violence related to security, communication of policy, and the environment and culture. • PC managers did not ensure that appropriate TAT processes were followed and performance measures	X	X	X
Oversight	 at the area and PC levels. of the Workplace Violence Prevention and Response Program PC and former area HR managers did not provide adequate oversight of the violence prevention and response programs. PC managers did not ensure TATs implemented many required policies and procedures to reduce the potential for violence related to security, communication of policy, and the environment and culture. PC managers did not ensure that appropriate TAT processes were followed and performance measures were documented. Former area HR manager did not ensure the three PCs fully implemented the program even though the OIG recommended improvements to the Greater South Carolina and Richmond programs in November 2000. PC managers relied on HR managers to ensure compliance with the TAT Guide requirements. 	X	X	X
Oversight Condition	 at the area and PC levels. of the Workplace Violence Prevention and Response Program PC and former area HR managers did not provide adequate oversight of the violence prevention and response programs. PC managers did not ensure TATs implemented many required policies and procedures to reduce the potential for violence related to security, communication of policy, and the environment and culture. PC managers did not ensure that appropriate TAT processes were followed and performance measures were documented. Former area HR manager did not ensure the three PCs fully implemented the program even though the OIG recommended improvements to the Greater South Carolina and Richmond programs in November 2000. 	X X X	X X X	X X X

The EDR is a structured process that enhances communications between employees and their supervisors and supports employee performance and contributions, which assist in the success of local operations.

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

Redacted

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

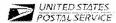
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APPENDIX H. RICHMOND PERFORMANCE CLUSTER FISCAL YEAR 2006 VOICE OF THE EMPLOYEE SURVEY RESULTS FOR QUESTIONS RELATED TO THE WORKPLACE ENVIRONMENT

Redacted

APPENDIX I. MANAGEMENT'S COMMENTS

VICE PRESIDENT CAPITAL METRO AREA



October 1, 2007

Kim Stroud Director, Audit Reporting 1735 North Lynn Street Arlington, Virginia 22209-2020

Subject: Transmittal of Draft Audit Report – Postal Service's Violence Prevention and Response Programs in Three Capital Metro Area Performance Clusters (Report Number HM-AR-07-DRAFT)

This is in response to the OIG Audit report dated August 30, 2007 and recommendations concerning the Workplace Violence Prevention Program. This is our amended submission which supersedes and replaces the first submission. This response addresses the purpose of the audit as stated in the October 5, 2006 Engagement Announcement, which was to "determine if selected locations have implemented required controls (policies and procedures) to reduce the potential for violence". It also provides the Capital Metro Area's actions to address each recommendation. The following are our responses to the recommendations.

Communication of Policy Strategy:

Recommendation [1]:

We recommend the Vice President, Capital Metro Area Operations:

Direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to implement an internal control to ensure current zero tolerance policies are properly posted in all facilities, at least annually. For example, facility managers could provide written annual certifications to the performance cluster threat assessment teams.

Response: The newly revised publication 108 states in the compliance chapter on page 31 that 'TAT policy information is to <u>be issued</u>, at a minimum, annually. This information includes the zero tolerance policy statement and reporting procedures for all employees'. The December 2002 edition of Publication 108 states the same policy. This requirement was included to ensure policies are communicated to employees. It is the communication, not necessarily the posting that ensures that employees are informed of the agencies zero tolerance policies. It is clear from the audit that efforts to ensure such communications were documented and went well beyond the requirements of the Headquarters policies and procedures for the Workplace Violence Prevention Program. The Capital Metro Area went beyond the requirements with the following action in response to recommendation 1: Each Performance Cluster has submitted a plan to ensure that the Zero Tolerance policy is updated, properly posted, and visible in all facilities. An annual certification to the Area will be required.

Workplace Violence Awareness Training:

Recommendation [2]:

We recommend the Vice President, Capital Metro Area:

Notify the Capital, Greater South Carolina, and Richmond Performance Cluster managers that workplace violence awareness training is a fiscal year mandatory requirement, and it is their responsibility to ensure that training occurs, preferably during non-peak operational periods.

Response: The 1 hour workplace violence awareness training courses #18201-21 and #18201-24 were a FY 2006 training requirement. According to Appendix E of the report, the HR managers had ensured that most employees (26,816) and TAT core members received the required fraining. In addition, for recommendation 2: Capital. Greater South Carolina, and Richmond Performance clusters have been notified that the 1 hour workplace violence awareness training is a fiscal year mandatory requirement.

Recommendation [3 & 4]:

Direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to determine which managers, supervisors, and 204b supervisors have not received the 8-hour (one-time) workplace violence awareness training, and provide the training as soon as possible.

Instruct the Capital, Greater South Carolina, and Richmond District managers to:

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

Response: The training course titled "Workplace Violence Awareness Training", course number 21558-00 is required for every manager and supervisor. Publication 108 reflects the original step with the training, where 64,000 or more supervisors were trained, and then the Associate Supervisor Program was tasked with providing the WVA training to new supervisors. Our records show that in the Capital District 774 employees have taken this course during the time period of 2004-2007. The Capital District has 720 non-bargaining employees, of which the variation is due largely to 204b Supervisors being trained. A manual review of the sign-in sheets could have been conducted to determine an exact breakdown to evidence the level of compliance. This exemplary effort should be reflected in the audit report. The other two districts' training records do not mirror this effort, however, it is imperative that audit reports reveal the merits of compliance and not generalize to the least common denominator. To further improve the effort to ensure that training requirements are met, the Capital Metro Area has taken the following steps for recommendations 3 & 4:

Each cluster has been directed to identify and ensure all managers, supervisors, and 204b supervisors receive the 8-hour (one time) Workplace Violence Awareness training course number 21558-00.

The districts have been tasked to conduct quarterly reviews to determine who has not received this training and ensure that it is provided.

Strategies to Enforce Postal Service Policy Not Fully Implemented:

Recommendation [5]:

Remind the Capital, Greater South Carolina, and Richmond Performance Cluster managers of their responsibility to ensure threat assessment teams comply with the Threat Assessment Team Guide when responding to and resolving incidents of violent and inappropriate behavior.

Recommendation [6]:

- 3 -

Direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to implement a control to ensure threat assessment teams comply with the Threat Assessment Team Guide when responding to and assessing reports of potentially violent situations and inappropriate behavior.

Recommendation [7]:

Direct the Capital, Greater South Carolina, and Richmond threat assessment teams to review the incidents that had insufficient supporting documentation and determine if they were resolved in accordance with the Threat Assessment Team Guide.

Response: It is difficult to ascertain from the audit and Appendix E what requirements were not met which equate to improper case management. The lack of documentation does not automatically equate to the lack of action or a failing to meet a requirement. It is unclear as to how the audit is measuring whether the TAT team "immediately and firmly" responded. It is also uncertain as to the scope of the deficiencies and the real impact to the process. However, the Capital Metro Area has taken the following action for recommendation 5, 6 and 7:

Capital, Greater South Carolina, and Richmond districts as well as the remaining Capital Metro Area districts have been reminded of their responsibility to ensure threat assessment teams comply with the Threat Assessment Team Guide when responding to and resolving incidents of violent and inappropriate behavior.

Each district has been instructed to implement a control to ensure that the TATs comply with the TAT Guide when responding to and assessing reports of potentially violent situations and inappropriate behavior. This includes a tracking log for case management to include the risk assessment and follow-up.

By notice of this audit, Capital, Greater South Carolina, and Richmond were instructed to review those incidents with insufficient supporting documentation to determine whether or not they were resolved. The Human Resource managers will work with their Workplace Environment Analysts to ensure compliance.

Monitoring and Evaluating Workplace Climate Indicators

Recommendation [8]:

We recommend the Vice President, Capital Metro Area to:

Direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to ensure the threat assessment teams use as many climate indicators listed in the *Threat Assessment Team Guide* as feasible to proactively monitor workplace climates.

Response: The section focuses on responses from the HR Manager and how they review climate indicators. The recommendation then goes to the threat assessment teams to use the climate indicators listed in Publication 108 to monitor climates. The section then cites 31 employee complaints and makes a speculation that those complaints are significant to the district's moderation of risk to violent situations. 31 complaints represent .001 of the total number of employees and do not represent a viable sample to extrapolate to a deficiency in the commitment to the zero tolerance policy. In the three districts of this area, this equates to an average of approximately 10 per district for a fiscal year that called the hotline about workplace environment issues. Nevertheless, The Capital Metro Area has responded to recommendation #8 by:

-4-

The Capital, Greater South Carolina, and Richmond districts TATs were directed to monitor and evaluate climate indicators such as EEO complaints, grievances, Safety, Injury Compensation claims, EAP referrals. Flash reports, and VOE survey results to identify trends and potential hotspots at least quarterly with documentation to support these evaluations.

Team Process and Performance Measures Could Be Improved

Recommendation [9]:

We recommend the Vice President, Capital Metro Area, direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers to:

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

Response: The EAP/Workplace Environment Improvement (WEI) Office web-based TAT Membership & Meeting Tool was designed to ensure management conducts, documents, and disseminates PC TAT meetings in accordance with the TAT Guide. Effective March 2007, The Capital Metro Area further responds to recommendation 9 with the following:

The Human Resource managers of the Capital, Greater South Carolina, and Richmond districts were reminded of their responsibility to conduct meetings, and properly document and disseminate the minutes to the appropriate TAT members.

Threat Assessment Team Performance Measures

Recommendation [10]:

We recommend the Vice President, Capital Metro Area, direct the Capital, Greater South Carolina, and Richmond Performance Cluster managers, to:

Implement a control to ensure threat assessment teams document the processes used to measure the team's performance, as required by the *Threat Assessment Team Guide*, and ensure the measurements used are adequate for determining success and identifying areas for improvement.

Response: This recommendation is vague and provides no reference to a requirement that was not met, nor does it indicate how a TAT would measure and provide assurance that their efforts to prevent violent incidents in the workplace were successful or needed improvement. The measures already suggested in Publication 108 may provide more useful information to identify areas for TAT improvement. Publication 108 outlines different evaluation types, districts are required to conduct post analysis on Priority 1 & 2, but no standard is set as to other cases. We have processes, procedures, priority ratings; and compliance measures, as well as processes for documenting the teams' activities. This recommendation fails to take into account that it is impossible to measure success because we cannot measure the incidents that did not happen. Regardless of our concerns as to the ability of TATs to provide assurances that their efforts are successful or need improvement, the Capital Metro Area has taken the following action in response to recommendation 10:

Each district was instructed that each TAT must provide assurance (other than verbal feedback) that their efforts to prevent violent incidents in the workplace were successful or need improvements and to ensure that these TAT processes are documented and adequate.

Oversight of the Workplace Violence Prevention Program

-5-

Recommendation [11 & 12]:

Implement an internal control to ensure Capital Metro Area Performance Cluster managers provide adequate oversight of their threat assessment teams to improve the effectiveness of the violence prevention and response programs. For example, performance cluster managers could provide the area Vice President with an annual certification that the teams are conducting business in accordance with the Threat Assessment Team Guide and related Postal Service policies.

Determine if the findings in this report exist in the remaining Capital Metro Area Performance Clusters – Baltimore, Greensboro, Mid-Carolina, and Northern Virginia – and, where necessary, take action to ensure management implements adequate controls.

Response: This recommendation does not relate to any additional findings or failures to meet a requirement in the Postal Service's Violence Prevention and Response Program, but recommends another internal documentation process for all offices in the Capital Metro Area. In their continued effort to make every effort toward a workplace free of violence, the Capital Metro Area has agreed to the following with regard to recommendations 11 & 12.

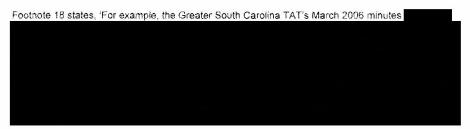
Each Performance Cluster will be required to submit an annual certification that the teams are conducting business in accordance with the Threat Assessment Team Guide, Publication 108.

The annual certification mandate includes the remaining Capital Metro Area Performance Clusters – Baltimore, Mid-Carolinas, Greensboro, and Northern Virginia.

The following list identifies two portions of the draft report that contain proprietary or other business information that warrants exemption from disclosure under the Freedom of Information Act (FOIA).

Under the section, "Workplace Violence Awareness Training Needed for Some Employees", the report states, "For example, the Greater South Carolina's March 2006 TAT Minutes indicate

The above paragraph cites a statement of disclosure from TAT meeting minutes that presents seemingly predecisional thoughts and discussion and warrants being withheld pursuant to exemption 5 of the FOIA.



The references above go to predecisional thought and discussion and a disclosure that constitutes an unwarranted invasion of an individual's personal privacy, respectively pursuant to FOIA exemptions 5 and 6.

-6-

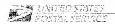
Capital Metro Area Operations remains dedicated to violence prevention. An annual certification will be required of each District manager to ensure we are in compliance with the Threat Assessment Team (TAT) Guide, Publication 108 as it pertains to responding to and assessing the seriousness of violent and potentially violent situations. The first annual certification is due November 19, 2007. Audits may be conducted by a Human Resource staff member to ensure compliance.

Jerry D. Lane Area Vice- President Capital Metro Area

Attachments

The Postal Service's Violence Prevention and Response Programs in Three Capital Metro Area Performance Clusters

Vice President Capital Metho Area



September 24, 2607

DISTRICT MANAGERS CAPITAL METRO AREA

Subject: Violence Prevention and Response Program

The United States Postal Service remains dedicated to violence prevention through carefully developed policies and programs. The Threat Assessment Team (TAT) Guide, Publication 108 provides guidance and resources in responding to and assessing the seriousness of violent and potentially violent situations. Your required strategies for reducing workplace violence per this publication include the following:

- Ensure Zero Tolerance Policies are updated, properly posted, and visible in all facilities.
- Workplace Violence Annual Refresher training, course number 21201-71 is a fiscal year mandatory requirement for the TAT. Ensure this training occurs and is documented.
- Ensure that all your managers, supervisors, and 204b supervisors in your district have received
 the 8-hour (one time) Workplace Violence Awareness training course number 21558-00. Use
 available tools to identify 204b supervisors such as the 22:1 Supervisor Report. It is the district
 Human Resources manager's responsibility to conduct quarterly reviews to determine who has not
 received this training and ensure that it is provided.
- It is expected that the TAT comply with Publication 108, when responding to and resolving
 incidents of violent and inappropriate behavior. In addition, a tracking log should be implemented
 for case management to include the risk assessment and follow-up. A national standard tracking
 system is expected to be eventually implemented to assist you. Depending on the seriousness,
 cases should be reviewed and analyzed after resolution. Cases reviewed with insufficient
 documentation should be reassessed to determine if resolved.
- TAT meetings are to be conducted at least twice a quarter. The meeting minutes are to be properly documented and disseminated to the appropriate team members in accordance to Publication 108 and documented in TAT Information Clearing House on the EAO/WEI homepage
- Climate indicators such as EEO complaints, grievances, Safety, Injury Compensation claims, EAP
 referrals, Flash reports, and VOE survey results should be monitored and evaluated by the TAT to
 identify trends and potential hotspots. These evaluations should be documented at least
 quarterly.
- TATs must provide assurance (other than verbal feedback) that their efforts to prevent violent incidents in the workplace were successful or need improvements. Controls should be in place to ensure these measurements are adequate for determining success or identify areas of improvement must be documented.

The attached annual certification must be completed to ensure that your district has compiled with these requirements NLT November 19, 2007. If a requirement has not been completed, the plan and expected date of completion should be annotated. Questions regarding these requirements may be addressed to Mary Shelton, Human Resources Analyst, at (301) 548-2840.

Jany D. Lane Area Vice- President Capital Metro Area

co: District Managers, Human Resources

Certification Form

This document is to be submitted to the Area Vice-President, Jerry Lane, NLT November 19, 2007.

I certify the completion of the below listed requirements in accordance with Threat Assessment Team Guide, Publication 108, within my area of responsibility.

Date completed or expected date of completion:

	Date of Certification	
WARRIED AND AND AND AND AND AND AND AND AND AN	District	
	District Manager Name (print)	
	District Manager Name (signature	:)