



January 14, 2008

TIMOTHY C. HANEY  
VICE PRESIDENT, NORTHEAST AREA OPERATIONS

SUBJECT: Audit Report – The Postal Service’s Violence Prevention and Response Programs in Four Northeast Area Performance Clusters (Report Number HM-AR-08-005)

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 four Northeast Area Performance Clusters (PC) (Project Number 06YG044HM001). The Northeast Area was one of five areas judgmentally selected from the nine Postal Service areas of operation.<sup>1</sup> Our overall objective was to determine if the violence prevention and response programs in the Albany, Boston, Massachusetts, and New Hampshire/Vermont 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 fifth 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 with nationwide impact.

We concluded the Albany, Boston, Massachusetts, and New Hampshire/Vermont PCs established threat assessment teams (TAT) and took some positive steps to reduce the potential for violence such as conducting climate assessments and closely communicating with union representatives and Employee Assistance Program (EAP) consultants. 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, Northeast Area and PC managers did not provide adequate oversight of the violence prevention and response programs to ensure compliance with policies and procedures.

This report includes 16 recommendations to help the Northeast Area, its PCs, and its TATs improve the effectiveness of the violence prevention and response program. Implementation of these recommendations will also improve the safety and security of

---

<sup>1</sup> The five areas reviewed were Capital Metro, Northeast, Pacific, Southeast, and Southwest.

employees and prevent harm to the Postal Service's reputation (goodwill). We will report these non-monetary impacts in our *Semiannual Report to Congress*.

Management agreed to implement all 16 recommendations, and the actions taken or planned 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 the implementation of three of the six strategies — security, communication of policy, and environment and culture.

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

We discuss our objectives, 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 Albany, Boston, Massachusetts, and New Hampshire/Vermont 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 four PCs may not have ensured that facilities had appropriate security safeguards in place. The Albany, Boston, Massachusetts, and New Hampshire/Vermont PC security coordinators stated that corrective actions were taken on the security and safety deficiencies identified at the facilities within the four PCs in fiscal year (FY) 2006. However, the coordinators did not maintain documentation regarding the actions taken or how the actions corrected the deficiencies.

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 FY 2006 Voice of the Employee (VOE)<sup>2</sup> Survey results for the Albany, Boston, Massachusetts, and New Hampshire/Vermont PCs indicate that numerous employees were concerned that unauthorized individuals could gain access to facilities in their PCs. (See Appendices F, G, H, and I for additional details regarding VOE Survey responses.)

In FY 2007, the Northeast Area security coordinator took corrective action to ensure documentation was maintained and therefore we have no recommendations in this report regarding security.

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

#### Zero Tolerance Policy Postings Could be Improved

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

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

---

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

both PC managers sign the zero tolerance policy it reaffirms to all employees the managers' commitment to a violence free workplace.

### **Recommendations**

We recommend the Vice President, Northeast Area Operations:

1. Direct the Albany, Boston, Massachusetts, and New Hampshire/Vermont 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.
2. Direct the [REDACTED] Performance Cluster managers to update their zero tolerance policies to include the lead plant managers' signature.

### **Workplace Violence Awareness Training Needed for Some Employees**

The [REDACTED] PC and Human Resources (HR) managers ensured most employees and TAT core members<sup>3</sup> received the required training. The [REDACTED] and [REDACTED] PC and HR managers also ensured most employees received the training, but they did not ensure all TAT core members received the required 2-day TAT orientation class training. In addition, none of the four HR managers ensured that all managers, supervisors, and 204b supervisors<sup>4</sup> 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. In addition, TAT members that are not adequately trained may not be effective in establishing or administering violence prevention and response programs to reduce the risk of violence in the workplace.

### **Corrective Action**

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

---

<sup>3</sup> TAT core members include the HR manager or designee, labor relations manager, medical director or occupational health nurse administrator (OHNA), district manager or designee, and lead plant manager or designee.

<sup>4</sup> A 204b supervisor is a bargaining employee detailed to an acting supervisor position.

## Recommendations

We recommend the Vice President, Northeast Area Operations:

3. Notify the Albany, Boston, Massachusetts, and New Hampshire/Vermont 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.
4. Direct the [REDACTED] Performance Cluster and Human Resources managers to attend the 2-day threat assessment team orientation class as soon as possible.
5. Direct the [REDACTED] Performance Cluster managers to ensure the occupational health nurse administrator attends the 2-day threat assessment team orientation class as soon as possible.
6. Direct the Albany, Boston, Massachusetts, and New Hampshire/Vermont 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.
7. Instruct the Albany, Boston, Massachusetts, and New Hampshire/Vermont District Managers to:
  - Remind Human Resources managers of their responsibility to conduct periodic reviews (at least quarterly)<sup>5</sup> 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 to determine which managers and supervisors did not receive the violence awareness training.

## Strategies to Enforce Postal Service Policy Not Fully Implemented

The Albany, Boston, and New Hampshire/Vermont 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 91<sup>6</sup> incidents reported to the four TATs in FY 2006 and determined that 14 of them were not properly addressed in accordance with the TAT Guide.

---

<sup>5</sup> Quarterly reviews would provide sufficient time to schedule employees for training within the fiscal year it is required.

<sup>6</sup> We reviewed 42 Albany, seven Boston, 33 Massachusetts, and nine New Hampshire/Vermont PC incidents.

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, Northeast Area Operations:

8. Remind the [REDACTED] 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.
9. Direct the [REDACTED] 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.
10. Direct the [REDACTED] 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*.

### **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 four 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, close communications with union representatives and EAP consultants, and regular meetings of the Executive Safety and Health committee 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 13 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, Northeast Area Operations:

11. Direct the Albany, Boston, Massachusetts, and New Hampshire/Vermont Performance Cluster managers to ensure the threat assessment teams document their evaluations of climate indicators to identify trends and potential hotspots.

### **Team Process and Performance Measures Could be Improved**

#### **TAT Members, Meetings, and Minutes**

The [REDACTED] TATs had the requisite number and type of team members; however, the [REDACTED] TAT did not. The [REDACTED] TATs did not consistently conduct quarterly<sup>7</sup> meetings and properly prepare and disseminate minutes, but the [REDACTED] TAT did.

A TAT that does not conduct and properly document its meetings runs the risk of not achieving the TAT's primary mission – preventing workplace violence.

### **Corrective Action**

The TAT Membership and Meeting Tool should help to ensure that 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.

### **Recommendations**

We recommend the Vice President, Northeast Area Operations, direct the Albany, Boston, and New Hampshire/Vermont Performance Cluster managers to:

---

<sup>7</sup> The Postal Service modified the TAT Guide in March 2007 to require meetings twice a quarter.

12. Remind the [REDACTED] managers of their responsibility to conduct meetings, and properly document and disseminate the minutes to the appropriate threat assessment team members.

We also recommend the Vice President direct the [REDACTED] Performance Cluster managers to:

13. Ensure the threat assessment team has the requisite number and type of threat assessment team members.

### TAT Performance Measures

The Albany, Boston, Massachusetts, and New Hampshire/Vermont HR managers stated they implemented informal performance measures such as TAT discussions 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.

TATs cannot provide assurance that their efforts to prevent violent incidents in the workplace were successful or needed improvement when the measures used are not documented. 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, Northeast Area Operations, direct the Albany, Boston, Massachusetts, and New Hampshire/Vermont Performance Cluster managers to:

14. Implement controls to ensure threat assessment teams document the processes used to measure the teams' 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 indicated the Albany, Boston, Massachusetts, and New Hampshire/Vermont PC and Northeast Area HR managers did not provide adequate oversight of the violence prevention and response programs. The PC managers did not ensure the four 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 [REDACTED] managers also did not ensure TATs followed appropriate processes and documented performance measures.

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 Albany, Boston, Massachusetts, and New Hampshire/Vermont ■ managers, if implemented, should provide sufficient oversight of the TATs at the ■ level. As a result, we have no additional recommendations for PC managers regarding communication of policy and environment and culture strategies.

## **Recommendations**

We recommend the Vice President, Northeast Area Operations:

15. Implement an internal control to ensure Northeast 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.
16. Determine if the findings in this report exist in the remaining Northeast Area Performance Clusters – Connecticut, Maine, Southeast New England, and Western New York – and, where necessary, take action to ensure management implements adequate controls.

## **Management's Comments**

Management did not clearly state whether they agreed or disagreed with the report findings and non-monetary impact. Included in management's response are comments from headquarters, who partnered in their response, noting areas where they disagreed with the findings. In addition, management did not initially agree to implement some of the recommendations. However, in subsequent correspondence, management agreed to implement all 16 recommendations, agreed with the non-monetary impact, and provided descriptions of actions taken and planned. For example, management provided a copy of a form requiring district managers to certify annually to the Northeast Area Vice President, that their TATs are conducting business in accordance with the TAT Guide and they have completed workplace violence awareness training.

Management also provided detailed points regarding some of the findings and recommendations 1, 3, 8 through 11, 14, and 15. We have included management's comments, in their entirety, in Appendix J, and have summarized their detailed points in Appendix K.

## Evaluation of Management's Comments

Management's agreement to implement all 16 recommendations is responsive and the actions taken or planned should correct the issues identified. We do not agree, however, with some of management's comments. Our response to specific points made in management's comments are included in Appendix K.

The OIG considers the district's annual TAT certification form and copies of training records and updated zero tolerance policy statements sufficient documentation to close significant recommendations 1, 2, 4 through 7, 13, 15, and 16.

The OIG considers recommendations 3, 9, 10, 11, and 14 significant and, therefore, requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These recommendations should not be closed in the follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

We appreciate the cooperation and courtesies provided by your staff during the audit. If you have any questions or need additional information, please contact Chris Nicoloff, Director, Human Capital, or me at (703) 248-2100.

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

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

## Attachments

cc: Mary Anne Gibbons  
Doug A. Tulino  
J. Stan Pullen  
James H. Adams  
Charles K. Lynch  
John W. Powers III  
Margaret A. Weir  
Sandra J. Savoie  
Katherine S. Banks

## APPENDIX A. ACRONYMS

ASAP	Area Security Assessment Program
ASM	Administrative Support Manual
EAP	Employee Assistance Program
EEO	Equal Employment Opportunity
FOIA	Freedom of Information Act
FY	Fiscal Year
HR	Human Resources
NTD	National Training Database
OIG	U.S. Postal Service Office of Inspector General
OHNA	Occupational Health Nurse Administrator
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.

*Sharon Mitchell, RN*  
D.C. Nurses Association

*Sebastian C. Russo*  
Federation of Postal Police Officers

*Vincent P. Sambrotta*  
National Association of Letter Carriers

*Allen P. ...*  
National Postal Mail Handlers Union

*Harold A. ...*  
United States Postal Service

*Rubi ...*  
National Association of Postal Supervisors

*James F. Mills*  
National Association of Postmasters of the United States

*...*  
National League of Postmasters of the United States

*William ...*  
National Rural Letter Carriers' Association

Dated: February 14, 1992

PLEASE POST ON BULLETIN BOARDS IN ALL INSTALLATIONS

## APPENDIX C. OBJECTIVES, SCOPE, AND METHODOLOGY

The overall objective of this audit was to determine if the Postal Service's violence prevention and response programs in selected locations were effective in reducing the potential for violence. Specifically, we determined whether (1) the Albany, Boston, Massachusetts, and New Hampshire/Vermont 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.<sup>8</sup>

To evaluate the workplace violence prevention and response programs in the Northeast Area, we judgmentally selected the Albany, Boston, Massachusetts, and New Hampshire/Vermont PCs from the eight PCs in the Northeast Area. We selected these PCs based on an analysis of seven workplace environment climate indicators for FYs 2004 through 2006.<sup>9</sup> We took steps to ensure the sample was representative of PCs where the indicators show the climate was good and where the climate was troubled. We also considered whether the PC appeared on the Postal Service's troubled worksite list<sup>10</sup> and whether the OIG conducted prior workplace environment audits in the PCs. 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 Workplace Improvement Analysts (WIA); and the area's HR manager 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. These interviews were also used to determine whether 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 policies 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 also 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.<sup>11</sup>

---

<sup>8</sup> We will address oversight at the headquarters level in a separate report.

<sup>9</sup> 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.

<sup>10</sup> Troubled worksites are facilities where evidence exists of an ongoing history of behavioral factors that remain unresolved at the PC and area levels.

<sup>11</sup> The VOE Vital Few List identifies PC facilities with the largest opportunity for VOE Survey score improvement.

- Attendance records for required workplace violence awareness training.
- TAT incident reports and responses.
- Stand-up talks and direct mailings to employees related to zero tolerance policies and action plans.
- Numbers of grievances and EEO complaints.
- Numbers of assaults and credible threats.
- HR managers' and staff roles and responsibilities in the workplace violence prevention and response programs.

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 December 2006 through January 2008 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances.<sup>12</sup> Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe 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 August 14, October 3, and December 17, 2007, and included their comments where appropriate.

---

<sup>12</sup> For example, we reviewed internal controls related to the posting and dissemination of PC zero tolerance statements, FY 2006 workplace violence awareness training records, TAT incident case files, climate indicators used to monitor and evaluate PC workplace environments, TAT meeting frequency and minutes, and performance measures used to evaluate TAT performance.

## APPENDIX D. PRIOR AUDIT COVERAGE

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 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. 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. ALBANY, BOSTON, MASSACHUSETTS, AND NEW HAMPSHIRE/VERMONT PERFORMANCE CLUSTERS' CONDITIONS AND CAUSES RELATED TO AUDIT OBJECTIVES

<b>Objective 1 – Determine if the PCs implemented required controls (policies and procedures) to reduce the potential for violence.</b>					
<b>1. Security Strategy - Ensure appropriate safeguards for employees, customers, and property.</b>					
<b>Condition</b>	PCs may not have ensured appropriate security safeguards were in place and complied with at many facilities.	X	X	X	X
	<ul style="list-style-type: none"> <li>██████████ did not maintain documentation that showed how the security deficiencies identified in 909 FY 2006 ASAP reviews were corrected. For example, the reviews identified exterior doors/access points to facilities were not secured (79 deficiencies), and unauthorized access to the facilities were not challenged (29 deficiencies).</li> </ul>	X	X	X	X
<b>Cause</b>	Management did not require installation heads to certify they had corrected deficiencies.	X	X	X	X
<b>2. Communication of Policy Strategy – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.</b>					
<b>Condition</b>	PCs disseminated FY 2006 current local zero tolerance policies to all PC employees through stand-up talks and new employee orientation classes.	✓	✓	✓	✓
	Some communication improvements are needed.	X	X	X	X
	<ul style="list-style-type: none"> <li>The zero tolerance policy was not posted in eight of the 13 facilities visited.</li> </ul>	X	X	X	✓
	<ul style="list-style-type: none"> <li>The zero tolerance policy was not signed by the ██████████.</li> </ul>	✓	✓	X	X
<b>Cause</b>	Facility was renovated and policy had not been reposted.			X	
	Facility manager did not know why the policy was not posted.	X			
	Facility manager stated the policy was not posted due to an oversight.	X			
	██████████ believed the policy was posted at all the facilities.	X	X		
	██████████ believed the policy was posted on a bulletin board in the employee break room.			X	
	██████████ believed the ██████████ signatures were not required.			X	X

Note: X indicates the ██████████ was not in compliance and the cause for non-compliance.  
 ✓ indicates the ██████████ was in compliance.  
 no symbol indicates not applicable.

2. Communication of Policy Strategy (Continued) – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.					
<b>Condition</b>	Workplace violence awareness training needed for some employees and TAT core members.	X	X	X	X
	• [redacted] ensured most employees (31,763) received the required training.	✓	✓	✓	✓
	• [redacted] ensured all TAT core members received the required training.	X	✓	✓	X
	• [redacted] managers did not ensure all managers, supervisors, and 204b supervisors received the required 8-hour (one time) workplace violence awareness training.	X	X	X	X
<b>Cause</b>	[redacted] managers believed employees completed the 8-hour violence awareness training; however, some training was not recorded or the training records did not indicate if employees completed the training.			X	X
	* [redacted] managers did not schedule the 8-hour violence awareness training because it was not included in the FY 2006 headquarters list of mandatory training requirements.	X	X		
	TAT was unaware the OHNA is a required TAT core member.				X
	[redacted] were not available when the training was offered. <sup>13</sup>	X			
<b>Condition</b>	TATs did not fully implement violence prevention strategies to ensure incidents of violent and inappropriate behavior were fully addressed in accordance with TAT Guide.	X	X	✓	X
	• 14 incidents reported to TATs in FY 2006 were not properly addressed (77 were).	X	X	✓	X
	➢ 5 did not receive proper case management (including documenting the assessment of the risk level) <sup>14</sup> and were not monitored and tracked to ensure resolution (9 were).	✓	X	✓	X
	➢ 10 had no documented risk abatement plans (4 did).	✓	X	✓	X
	➢ 1 was not immediately and firmly respond to (13 were).	X	✓	✓	✓
	• Incident tracking logs not properly maintained to show when 84 of the 91 incidents were reported and resolved.	X	✓	X	X

\*These are headquarters issues we will address in a capping report.

<sup>13</sup> The [redacted] managers did not complete the required TAT orientation class because the [redacted] were attending a conference, and the [redacted] was in charge during the [redacted] absence.

<sup>14</sup> The TAT Guide defines the priority risk levels as priority 1 - extreme risk; priority 2 - high risk; priority 3 - low or moderate risk; and priority 4 - no risk.

<b>2. Communication of Policy Strategy (Continued) – Consistently communicate and enforce Postal Service policy regarding violent and inappropriate behavior.</b>					
<b>Cause</b>	██████ did not fully understand the importance of TAT responsibilities.	X	X	X	X
	• ██████ believed that, despite findings on 14 incidents, TATs handled incidents appropriately.	X			X
	• ██████ was not aware of incident tracking performed by previous ██████.		X		
	• ██████ were not aware of the requirement to keep a tracking log.			X	X
<b>3. Environment and Culture Strategy – Create a work setting and maintain an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.</b>					
<b>Condition</b>	██████ took positive steps toward creating an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.	✓	✓	✓	✓
	• ██████ used VOE Survey results, grievances, EEO complaints, close communications with unions and EAP consultants, and regular meetings with the Executive Safety and Health committee as climate indicators to identify and follow-up on events that could escalate the potential for violence	✓	✓	✓	✓
	Some improvements are needed.	X	X	X	X
	• ██████ did not maintain documentation on how they used other climate indicators to monitor and evaluate the workplace environment (including the frequency) except for VOE Survey results.	X	X	X	X
<b>Cause</b>	██████ considered evaluations of the VOE Survey results sufficient documentation of workplace climate indicators.	X	X	X	X
<b>Condition</b>	TATs did not always conduct quarterly meetings, properly prepare meeting minutes, and disseminate minutes to required TAT members. <sup>15</sup>	X	X	✓	X
	TATs had the requisite number and type of team members required by the TAT Guide.	✓	✓	✓	X
<b>Cause</b>	Informal discussions were held on an as needed basis relative to TAT activities.	X	X		
	██████ believed summarizing the incident to include the necessary follow-up actions in an email to TAT members was equivalent to preparing and disseminating meeting minutes.				X
	██████ was not aware the lead plant manager and OHNA were required TAT core members.				X

<sup>15</sup> The ██████ TAT conferred on a daily and weekly basis through email and teleconferences, which is more frequent than quarterly.

<b>3. Environment and Culture Strategy – Create a work setting and maintain an atmosphere perceived to be fair and free from unlawful and inappropriate behavior.</b>					
<b>Condition</b>	Measures to gauge TATs' success were not documented and may not have been adequate.	X	X		X
	• TATs informally used TAT discussions and reviews of VOE Surveys.	✓	✓	✓	✓
	• TATs did not document informal measurements.	X	X		X
	• TAT informally measured its performance by using risk abatement plans and evaluating the incidents during TAT meetings.			X	
<b>Cause</b>	TATs believed the informal measures accomplished the intended purpose.	X	X	X	X
<b>Objective 2 – Determine the adequacy of oversight of the workplace violence prevention program at the area and PC levels.</b>					
<b>Oversight of the Workplace Violence Prevention and Response Program</b>					
<b>Condition</b>	██████████ did not provide adequate oversight of the violence prevention and response programs.	X	X	X	X
	• ██████ 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.	X	X	X	X
	• ██████ managers did not ensure that appropriate TAT processes were followed and performance measures were documented.	X	X	X	X
<b>Cause</b>	██████████ relied on ██████████ to ensure compliance with the TAT Guide requirements.	X	X	X	X

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

Redacted

\* [REDACTED]

[REDACTED]

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

Redacted

\* [REDACTED]

[REDACTED]

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

Redacted

\* [REDACTED]

[REDACTED]

**APPENDIX I. NEW HAMPSHIRE/VERMONT PERFORMANCE  
CLUSTER FISCAL YEAR 2006 VOICE OF THE EMPLOYEE SURVEY  
RESULTS FOR QUESTIONS RELATED TO THE WORKPLACE  
ENVIRONMENT**

Redacted

\* [REDACTED]

[REDACTED]

## APPENDIX J. MANAGEMENT'S COMMENTS

TIMOTHY C. HANEY  
VICE PRESIDENT, AREA OPERATIONS  
NORTHEAST AREA



December 7, 2007

Lucine M. Willis  
Acting Director Audit Operations  
1735 No. Lynn Street  
Arlington, VA 22209-2020

SUBJECT: Transmittal of Draft Audit Report – The Postal Service's Violence Prevention and Response Programs in the Four Northeast Area Performance Clusters (Report Number HM-AR-08-DRAFT)

This is in response to the OIG Discussion Draft Audit Report dated November 23, 2007 and recommendations concerning the Workplace Violence Prevention Program. 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 Northeast Area's actions to address each recommendation. The following are our responses to the recommendations. Included in this management response are noted areas where Headquarters who partnered in our response disagreed with findings. It should also be noted that the original OIG auditors who went to each Northeast Area Performance Cluster (PC) left the agency and the data that they had compiled was given to other OIG auditors to complete. The advantage of hearing the activities from each of the audited PC's staffs allows room for a different interpretation on the final report.

In the last section of this response you will find the supporting documents to address actions taken that we believe address and often resolve or close the recommendations as presented in this draft document. They are titled appropriately to reflect the specific "number" of the recommendation.

On page four of this draft document under the category of "Results", there is reference to the Voice of the Employee Survey (VOE) questions relative to appropriate security safeguards that should be utilized in facilities. Specifically, and I quote, "Survey results for the Albany, Boston, Massachusetts and New Hampshire/Vermont PC's indicate that numerous employees were concerned that unauthorized individuals could gain access to facilities in their PC's".

5 GRIFFIN ROAD NORTH  
WINDSOR, CT 06006-7010  
860-285-7040  
FAX 860-285-1253

Appendix F, G H & I provide additional details to support this statement.

The VOE Survey is not the mechanism to track security infractions or actions taken or not taken to address workplace deficiencies. The draft mentions that security coordinators did not maintain documentation regarding the actions taken or how the actions corrected the deficiencies. This is not the purpose of the VOE survey, nor is the intended purpose to measure the success of any security programs. The VOE Survey is a "voluntary" process whose intention it is to take the "temperature" of the organization at a particular point in time. Since the survey is optional, employees may choose to fill it out or not. The "Response Rate" to the VOE survey is a critical piece of information that is not included in this reference to the VOE Survey results specifically related to any questions identified in the survey. To use a metric from the VOE survey to say that "numerous" employees were concerned that unauthorized individuals could gain access to their facilities without knowing how many people responded to the survey is an inaccurate statement. If the index score is a 70, for example, the minimum number of survey data sets required to yield an index score would have to be 10. Therefore, this 70 might be representative of 10 responses. Without knowing exactly how many people responded to this question makes it impossible to state that "numerous" employees feel that way. Another example on a larger scale would be to look at the Index Score for an entire Performance Cluster. At first glance, an index score of 80 might look like the Performance Cluster as a whole has a content workplace. However, if the response rate for that cluster was 20%, then clearly the data set you are looking at is only representative of the number of people who took the time to fill out the survey. The FY 2006 VOE Survey data for the four respective PC's is outlined in this table below:

#### **Communication of Policy Strategy**

##### Recommendations:

We recommend the Vice President, Northeast Area Operations:

1. Direct the Albany, Boston, Massachusetts and New Hampshire/Vermont 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 (TAT).
2. Direct the [REDACTED] Performance Cluster managers to update their zero tolerance policies to include the lead plant manager's signature.

Response:

The newly revised Publication 108 states in the Compliance chapter on page 31 that TAT policy information is to **be issued**, 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 agency zero tolerance policy. Annual certification will be required for all PCs to the Threat Assessment Teams and will model the process created by the Massachusetts PC for all clusters in the Northeast Area.

As you have stated in your draft response on Page 4, first paragraph, Corrective Action, "As a result of this audit, the [REDACTED] PC updated their zero tolerance policy on August 2007 and this was sent to all PCs facilities for posting. The [REDACTED] PCs updated and mailed their zero tolerance policy to all PC employees (documents attached). The [REDACTED] PCs updated their zero tolerance policy to include the current lead plant manager's signature also in August 2007. In addition, the [REDACTED] PCs implemented an internal control to validate the receipt and posting of the policy in the PC's facilities." Both recommendations described above have been completed. In all cases, these documents have been provided to the OIG auditors *at least three times* during the course of this audit. Please see the attached documents, listed at the top of each page with the relevant "Recommendation Number" to address and resolve these issues.

**Workplace Violence Awareness Training**

Recommendations:

We recommend the Area Vice President, Northeast Area Operations:

3. Notify the Albany, Boston, Massachusetts and New Hampshire/Vermont 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.
4. Direct the [REDACTED] Performance Cluster and Human Resource Managers to attend the 2-day threat assessment team orientation class as soon as possible.

5. Direct the [REDACTED] Performance Cluster managers to ensure the Occupational Health Nurse Administrator attends the two-day threat assessment team orientation class as soon as possible.
6. Direct the Albany, Boston, Massachusetts and New Hampshire/Vermont 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.
7. Instruct the Albany, Boston, Massachusetts and New Hampshire/Vermont District Managers to:

Remind Human Resource 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) and threat assessment team members.

Implement a control to ensure Human Resource managers conduct periodic reviews to determine which managers and supervisors did not receive the violence awareness training.

Response:

The one-hour Workplace Violence Awareness Training courses 18201-21 and #18201-24 were a FY 2006 national training requirement. In FY 2007 and in FY 2008, there has not been a mandatory training requirement for Workplace Violence Awareness for the entire population. There are many annual training requirements for 2007 and 2008, none of which were specifically workplace violence awareness training. Attached please find the Annual "Strategic Training Initiatives" (STI) for FY 2007 and 2008.

The [REDACTED] Performance Cluster Human Resource Manager attended the threat assessment team orientation class and workplace violence awareness training on October 2 and 3, 2007. (Documents attached)

The [REDACTED] Performance Cluster Occupational Health Nurse Administrator attended the two-day threat assessment orientation class on 11/7-8/2007.

The Publication 108 reflects the original step with this training where 64000 or more supervisors were trained and then the Associate Supervisor Program was tasked with providing this training for newly promoted supervisors. Since FY 2000 334 additional employees have been trained in Workplace Violence Awareness training as part of the Associate Supervisor Program as documented in the National Training Database (NTD).

Strategies to Enforce Postal Service Policy Not Fully Implemented

Recommendations:

We recommend the Vice President, Northeast Area Operations:

8. Remind the [REDACTED] 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.
9. Direct the [REDACTED] 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.
10. Direct the [REDACTED] 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 report and Appendix E what requirements were not met which equate to improper case management. It is unclear as to how the audit is measuring whether the TAT team "immediately & firmly" responded. It is also uncertain as to the scope of the deficiencies and the real impact to the process. The VOE Survey is not a valid indicator to measure the management of the TAT process. Copies of all cases in the [REDACTED] District were provided to the OIG agents on three different occasions during this audit process.

The Northeast area will take the following action to Recommendations 9 & 10: The [REDACTED] will model the Massachusetts District process that was found to be successful and meet the requirements of this audit. This includes implementing a tracking log for case management to include risk abatement and follow-up.

### Monitoring and Evaluating Workplace Climate Indicators

#### Recommendations:

We recommend the Vice President, Northeast Area Operations:

11. Direct the Albany, Boston, Massachusetts, and New Hampshire/Vermont Performance Cluster managers to ensure the Threat Assessment Teams document their evaluations of climate indicators to identify trends and potential hotspots.

#### Response:

This section focuses on responses from the District Managers Human Resources and how they review climate indicators. The recommendation states that these managers should ensure the Threat Assessment Teams document their evaluations of climate indicators to identify trends and potential hotspots. In Appendix E, all four Districts were found to have met the requirements as identified by the auditors and received "checks" with regard to the following findings:

"HR Managers used VOE survey results, grievances, EEO complaints, close communication with the unions and EAP Consultants and regular meetings with the Executive Safety and Health committees as climate indicators to identify and follow up on events that could escalate the potential for violence." On the next item in Appendix E, it is unclear why all four districts received an "incomplete" action in the statement: "HR managers did not maintain documentation on how they used other climate indicators to monitor & evaluate the workplace environment (including frequency) except for VOE Survey results." All data relative to the workplace environment is contained in electronic databases that individually generate reports. These include the iComplaints system for data management of our EEO data, the GATS systems which is the electronic data system for our grievance statistics, and WebEIS which contains our safety data. Depending on the specific indicator, this data is updated daily, weekly and in the case of the VOE survey, quarterly.

Again, the lack of documentation does not automatically equate to the lack of action or a failing to meet a requirement. It is also uncertain as to the scope of the deficiencies as the real impact to the process. However, the Northeast Area will take the following action for Recommendation #11:

All Districts TATs were directed to monitor and evaluate climate indicators such as EEO complaints, grievance, safety & injury compensation claims, EAP referrals, VOE survey results, FLASH & complement reports to assist them in identifying trends and potential hotspots at least quarterly with

documentation to support these evaluations. This documentation will include the generation of reports from systems identified above.

### Team Process & Performance Measures Could be Improved

#### Recommendations:

We recommend the Vice President, Northeast Area Operations direct the [REDACTED] Performance Cluster managers to:

12. Remind the Human Resource Managers of their responsibility to conduct meetings and properly document and disseminate the minutes to the appropriate threat assessment team members.
13. Ensure the threat assessment team has the requisite number and type of 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 [REDACTED] Performance Cluster has made the changes necessary to the TAT team members by adding the Occupational Health Nurse to the core team as recommended in this audit and she has received the required TAT training. Of note, in Appendix E, Page 17, the Footnote #15 documents that "The [REDACTED] TAT conferred on a daily and weekly basis through email and teleconferences, which is more frequent than quarterly."

The Northeast Area further responds to Recommendations 12 & 13 with the following:

The District Managers Human Resources [REDACTED] were reminded of their responsibility to conduct meetings and properly document and disseminate the minutes to the appropriate TAT members.

### TAT Performance Measures

#### Recommendation:

We recommend the Vice President, Northeast Area Operations direct the Albany, Boston, Massachusetts and New Hampshire/Vermont Performance Cluster managers to:

14. Implement controls to ensure Threat Assessment Teams document the processes used to measure the teams' 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 more nor does it indicate how a TAT would measure and provide assistance that their efforts to prevent violent incidents in the workplace were successful or needed improvement. The measures in Publication 108 may provide more useful information to identify areas to 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. The recommendation fails to take into account that it is impossible to measure success because we cannot measure the incidents that *did not* happen. Having said this, the Northeast Area has taken the following action in response to Recommendation #14:

The Northeast Area will ensure compliance by using the debriefing model outlined in Publication 108, March 2007 (required for Level 1 & 2 incidents), and incorporate and document the activity in quarterly TAT meetings.

**Oversight of the Workplace Violence Prevention Program**

Recommendations:

We recommend the Vice President, Northeast Area Operations:

15. Implement an internal control to ensure Northeast 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.
16. Determine if the findings in this report exist in the remaining Northeast Area Performance Clusters – Connecticut, Maine, Southeast New England and Western NY – and where necessary, take action to ensure management implements adequate controls.

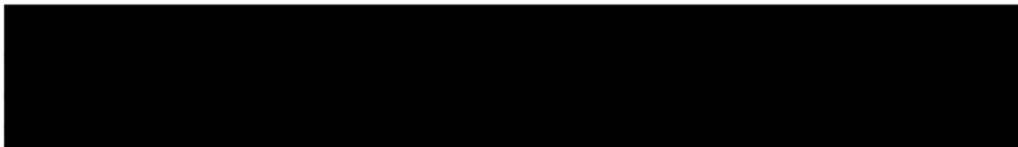
Response:

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 Northeast Area. In their continued and ongoing effort to maintain a safe workplace free of violence, the Northeast Area has agreed to the following with regard to Recommendations #15 & 16:

Each Performance Cluster will be required to submit an annual certification to the Area Vice President of Operations that the Threat Assessment Teams are conducting business in accordance with the *Threat Assessment Team Guide*, Publication 108.

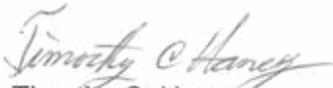
The annual certification mandate will also include the remaining Performance Clusters: Connecticut, Maine, Southeast New England and Western New York.

In closing, the following 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).



Further, this report cites areas of deficiencies that are not in Publication 108 nor have any precedent to being a compliance measure (i.e. zero tolerance policy must be posted, no requisite to documentation of how and when HR Managers evaluate and monitor climate indicators). The contradictions and inaccuracies of this report should preclude disclosure pursuant to Exemption 6.

The Northeast Area Operations remains dedicated to violence prevention.

  
Timothy C. Haney

Attachments

**CERTIFICATON FORM**

This document is to be submitted to the Area Vice President, Timothy C. Haney NLT than December 31, 2007.

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

**REQUIREMENT** **DATE COMPLETED OR EXPECTED DATE OF COMPLETION**

The District Zero Tolerance Policy is updated, posted and visible in all facilities.	
Workplace Violence Annual Refresher course 21201-71 is completed by all Threat Assessment Team Members.	
All managers, supervisors and 204B supervisors received Workplace Violence Awareness course # 21558-00	
Threat Assessment Teams are conducting business in accordance with the Threat Assessment Team Guide, Publication 108	

Date of Certification \_\_\_\_\_

District \_\_\_\_\_

District Manager Name (printed) \_\_\_\_\_

District Manager Name (signature) \_\_\_\_\_

**APPENDIX K. MANAGEMENT'S DETAILED POINTS AND OIG'S RESPONSE**

Finding or Recommendation Number	Management's Comments	OIG's Response
Security Strategy Finding	Management implied that we used the VOE Survey as a mechanism to track security infractions and actions taken or not taken to address workplace deficiencies. Management stated the response rate for the VOE Survey was a critical piece of information that we did not include in the report and that our statement that "numerous" employees were concerned that unauthorized individuals could gain access to their facilities was not accurate.	We did not use the VOE Survey as a mechanism to track security infractions or actions taken or not taken to address workplace deficiencies. We used the survey as an indicator of how career employees who responded to the survey felt about their workplace environment. We disagree with management that the response rate for the VOE Survey was missing from the report and that our statement in the report "numerous employees were concerned" is inaccurate. Appendices F through I provide information on the results of the FY 2006 VOE Survey for each of the four PCs. Each appendix contains the number of employees from each PC that responded to the survey. Our calculations indicate that 2,679 of the approximately 15,370 employees that responded to the survey responded negatively to the statement that access to their building is allowed through a system or procedure that keeps unauthorized individuals from entering. We believe this is adequate support that numerous employees were concerned.
Recommendation 1	Management agreed to implement the recommendation, but stated there is no TAT Guide requirement or other precedent that they must post zero tolerance policies.	We do not agree. The guide requires that employees be educated on their local TAT systems and processes to support zero tolerance. The guide lists a number of methods the PCs can use, including wall postings. According to management in the four PCs, posting the zero tolerance policy in all facilities was a PC requirement.
Recommendation 3	Management initially stated there were no mandatory, specific FY 2007 and 2008 workplace violence awareness training requirements.	In subsequent correspondence, management acknowledged that other training programs address the need to provide a workplace free of conflict through topics like "Dignity & Respect." Management stated that all Northeast Area districts completed these mandatory training requirements for FY 2007 and they are aware of the FY 2008 training requirements. In addition, management included in the district manager TAT Guide certification form the requirement that managers, supervisors, 204b supervisors, and TAT members receive the required training.
Recommendation 8	Management stated the audit report and Appendix E were not clear as to what requirements they did not meet that resulted in improper case management. Management also stated it was not clear how we measured whether the TAT "immediately & firmly" responded to incidents and that they were uncertain of the scope of the	We disagree with each of management's assertions. First, Appendix E clearly shows that management did not properly maintain incident tracking logs to show when 84 of the 91 cases were reported and how they were resolved. Appendix E also shows that 14 incidents were not properly addressed because the risk level was not assessed on five of them and 10 had no risk abatement plans. In addition, the audit report clearly states that improper case management diminishes the opportunities to prevent a violent incident from occurring.

Finding or Recommendation Number	Management's Comments	OIG's Response
	<p>deficiencies and the impact to the process. Management also implied that we used the VOE Survey to measure the management of the TAT process and stated it was not a valid indicator. Finally, management stated they provided us copies of all the cases in the Albany District on three different occasions during the audit process.</p>	<p>Second, management's claim that it was not clear how we measured whether the TATs "immediately &amp; firmly" responded to the incidents is without merit. We advised management on August 14, 2007, that we defined "immediately" as action taken right away or a response made without a loss of time, and by "firm" we meant an action that was steadfast, fixed and not subject to change. Management told us on December 14, 2006, that they define "immediately and firmly" as action that is consistent and taken right away. In addition, we provided our analysis of the TAT case files to management on September 19, 2007, so they could identify why the 14 incidents were not fully addressed in accordance with the TAT Guide.</p> <p>Finally, the █████ District provided copies of case documents to us sporadically throughout the audit process, beginning with incomplete case files early in the audit. As we reviewed the case files and determined that some were incomplete we notified management, resulting in their mailing additional (not the same) information to us at least twice.</p>
<p>Recommendation 9 and 10</p>	<p>Management initially stated only the ██████████ Districts would model the Massachusetts District's process for responding to and assessing reports of potentially violent situations and inappropriate behavior.</p>	<p>Management agreed, in subsequent correspondence, that the █████ PC would also model the Massachusetts District's process.</p>
<p>Recommendation 11</p>	<p>Management stated there is no TAT Guide requirement or other precedent that █████ managers must document how and when they evaluate and monitor climate indicators. Management said the lack of documentation did not automatically equate to a lack of action or failure to meet a requirement. Management stated that all workplace environment data is contained in electronic databases that generate reports including the iComplaints system for EEO data and the Grievance Arbitration Tracking System for grievance data.</p>	<p>We do not agree there is no TAT requirement to document how and when █████ managers evaluate and monitor climate indicators. While the guide does not specifically state management must document the evaluation and monitoring of climate indicators, it does state the TAT is responsible for evaluating the climate indicators and must discuss their responsibilities — including incident work site monitoring — at quarterly meetings. The guide further requires TATs to document their quarterly meetings (minutes). We also do not agree that workplace environment data in electronic databases is adequate documentation to support evaluation and monitoring. It is the analysis of the data to identify trends and potential hotspots that is important. We do agree with management that the lack of documentation does not automatically equate to a lack of action or failing to meet a requirement. Thus, our report gave █████ managers credit for taking positive steps to monitor and evaluate these climate indicators. The lack of documentation, however, makes it difficult for the</p>

Finding or Recommendation Number	Management's Comments	OIG's Response
		TATs to review and validate their efforts and for others to independently assess their efforts.
Recommendation 14	Management stated the recommendation was vague, provided no reference to a requirement, and did not indicate how the TAT could measure and provide assurance that their efforts to prevent violent incidents in the workplace were successful or needed improvement. Management stated the recommendation failed to take into account that it is impossible to measure success because they cannot measure incidents that do not happen.	We do not agree. The recommendation specifically states that TATs document the processes used to measure performance, as required by the TAT Guide. The guide states they must measure their performance and provides a number of measurement devices such as local or district tracking systems, post-incident analysis, and a review of climate indicators. While we agree that measuring incidents that did not happen would be difficult, it is possible to measure TAT performance. We believe the measures outlined in the TAT Guide can assist in this effort.
Recommendation 15	Management stated the recommendation did not relate to any additional findings or failures.	We do not agree. As stated in the report, our review of TAT activities also found inadequate oversight at the area level that we believe contributed to the four TATs not implementing many of the required policies and procedures and not following appropriate processes. Specifically, adequate oversight at the area level can reduce the potential for violence by helping to ensure that TATs follow important workplace violence prevention and response program policies and procedures.
Appendix E	Management also stated that our audit findings did not support our statement in Appendix E that ■ managers did not fully understand the importance of TAT responsibilities. Management considered this statement and others to be contradictory and inaccurate and, as such, requested the report not be disclosed in response to Freedom of Information Act (FOIA) requests.	We do not agree. Appendix E lists the deficiencies we found related to the 14 incidents, in addition to a number of policies and procedures not followed. We believe the ■ managers' responses why these deficiencies occurred indicate they did not fully understand the importance of the TAT Guide requirements.