



# OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

## Postal Service Workplace Violence Program

### Audit Report

Report Number  
HR-AR-16-004

September 28, 2016

Inappropriate workplace behaviors may lead to harassment, if not addressed promptly.

## Achieving a Violence-Free Workplace Together

Your role in creating and maintaining a violence-free workplace is critical to our success.



- Human Resources
- Union Leadership
- Management Associations
- Threat Assessment Teams
- Medical Units
- Post Office
- Post Office (24 Hours)
- Post Office (24 Hours)
- TTY

Publication 45  
June 2009

Poster 62, November 2009  
PSN 7690-05-000-4329

oppression to discrimination... participation in any process or proceeding designed to remedy discrimination.

The Postal Service workplace must be one in which all employees are treated with dignity and respect by supervisors, subordinates, and coworkers. Supervisors and managers will take prompt action to prevent, address, and remedy workplace conduct that is contrary to this policy.

**STOPPING INAPPROPRIATE BEHAVIOR**  
Inappropriate behavior in the workplace, even if it does not meet the legal definition of harassment, undermines morale and violates the Postal Service's policies and standards of conduct. The Postal Service may use disciplinary action even if the conduct does not rise to the level of harassment as defined under the law as such conduct violates Postal Service policy and will not be tolerated. The Postal Service owes its employees a safe, productive, and inclusive workplace and will tolerate nothing less.

**WORKPLACE HARASSMENT IS AGAINST THE LAW**  
Under federal antidiscrimination laws, harassment is defined as unwelcome verbal or physical conduct that demeans or shows hostility or aversion toward an individual or group of individuals.

- Making or threatening employment decisions based on an employee's submission of, or rejection of, sexual advances or requests for sexual favors.
- Deliberate or repeated unsolicited remarks with a sexual connotation, or physical contact of a sexual nature that is unwelcome to the recipient.
- Behavior that creates a sustained hostile or abusive work environment so severe or pervasive that it unreasonably interferes with or changes the conditions of one's employment.

**OBLIGATION TO REACT PROMPTLY**  
Postal Service employees who believe that they are the victims of workplace harassment or inappropriate conduct, or who have witnessed such harassment, should bring the situation to the attention of any one of the following:

- Their immediate supervisor or manager.
- Any supervisor or manager.
- The manager, Human Resources.
- A union representative or coworker who will speak to a manager on the employee's behalf.

Poster 159, February 2015  
PSN 7690-07-000-7099

If you elect complaint, y  
EEO Central



# OFFICE OF INSPECTOR GENERAL

## UNITED STATES POSTAL SERVICE

### Highlights

***On July 8, 2013,  
the Postal Service issued a  
memorandum instructing all  
headquarters, area, and district  
offices to use its tracking system  
when managing workplace  
violence cases starting  
August 1, 2013.***

### Background

The U.S. Postal Service has an obligation to ensure the safety of its employees by creating and maintaining a violence-free work environment. Workplace violence can occur at or outside of a postal facility while an employee is working and can range from threats and verbal abuse to physical assaults and homicides.

Postal Service employees who have been assaulted can notify their manager, file a formal Equal Employment Opportunity (EEO) complaint or grievance with the Postal Service, notify internal law enforcement organizations [(U.S. Postal Inspection Service or the U.S. Postal Service Office of Inspector General (OIG)] or contact the local police.

The Postal Inspection Service investigates assaults and threats against employees, while the OIG investigates allegations of hostile work environment and sexual harassment. Either can pursue criminal charges or refer the case to the Postal Service for further action. The Postal Service administers administrative action, such as letters of warning, suspensions, or removals as appropriate.

The Postal Service established the Workplace Environment Tracking System (tracking system) as its national repository for workplace environment incidents to analyze data, identify trends and develop preventive measures. On July 8, 2013,

the Postal Service issued a memorandum instructing all headquarters, area, and district offices to use its tracking system when managing workplace violence cases starting August 1, 2013.

In addition, threat assessment teams are required in each district to respond to and assess violent situations; and advise employees on what to do in the event they witness or are victims of violent behavior. The Postal Service requires facilities to display workplace violence posters and publications in postal facilities.

On March 13, 2015, the Postal Service responded to a congressional inquiry by describing the measures it takes to prevent sexual assault and harassment of its employees. In addition, Congress requested the number of sexual assaults and outcomes reported by Postal Service employees for 2013 and 2014.

Subsequent to the Postal Service's response, members of the House Committee on Oversight and Government Reform requested that we review the Postal Service's workplace violence program and validate the Postal Service's March 2015 response.

Our objectives were to evaluate whether the Postal Service adequately identified, reviewed, reported, and addressed employee assaults; and to validate the Postal Service's



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***The Postal Service has a comprehensive workplace violence program to identify, review, report, and address employee assaults nationwide.***

response to Congress. Our audit covers workplace violence incidents that occurred from September 1, 2013, through September 2, 2015, a period during which the Postal Inspection Service recorded 789 workplace violence cases nationwide.

### **What The OIG Found**

The Postal Service has a comprehensive workplace violence program to identify, review, report, and address employee assaults nationwide. The Postal Service and Postal Inspection Service appropriately addressed all workplace violence cases in the six selected districts reviewed. In these districts, the Postal Inspection Service investigated 145 cases, 60 of which involved Postal Service employees as assailants. The Postal Service imposed administrative actions, including suspensions and notices of removal, in all 60 cases, as required.

However opportunities exist to enhance the workplace violence program. Specifically, Postal Service officials did not always record all incidents of workplace violence in the tracking system, effectively use threat teams to review assault outcomes and develop preventive measures, and display all workplace violence posters and publications used to educate employees on identifying and reporting workplace violence incidents in postal facilities.

These and other issues occurred in the six districts we reviewed because:

- District Human Resources managers responsible for maintaining the tracking system database did not ensure responsible officials entered assault complaints into the tracking system as required. In addition, the policy does not give specific instructions regarding the deadline for doing so.
- There were no controls to ensure that threat assessment team activities were completed, including required training.
- Facility managers were not fully aware of the requirements to display workplace violence posters and were not required to check periodically that all workplace violence posters were displayed.

The Postal Service was responsive to Congress by providing information regarding how they prevent and respond to workplace violence incidents in reporting 68 employee sexual assaults that resulted in EEO complaints. However, all sexual assaults do not result in EEO complaints. As such, the Postal Service did not report 10 sexual assault cases investigated by the Postal Inspection Service for the period



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October 1, 2012, through December 1, 2014. Although the Postal Service qualified its response as pertaining only to EEO complaints, the inclusion of related Postal Inspection Service cases would have provided a more complete response.

Further, the Postal Service could not rely on the tracking system as a central repository for sexual assault data because officials were not always recording the data in the tracking system, as required. To gather complete data for its response to Congress, the Postal Service should have reviewed the tracking system, EEO complaints, and Postal Inspection Service cases.

As a result of these conditions, there is an increased risk the Postal Service will not effectively analyze data and identify

trends to address workplace violence incidents. Furthermore, without a single accurate source of data in this critical area of employee safety, it is more difficult to determine where problems exist and develop preventive measures.

### **What The OIG Recommended**

We recommended management establish additional controls to ensure that responsible officials enter workplace violence cases into the tracking system; and that threat assessment teams comply with established guidelines, ensure personnel are adequately trained on the tracking system and threat assessment team responsibilities, and conduct periodic reviews to ensure all required posters and publications are displayed.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

September 28, 2016

**MEMORANDUM FOR:** JEFFREY C. WILLIAMSON  
CHIEF HUMAN RESOURCES OFFICER AND  
EXECUTIVE VICE PRESIDENT

E-Signed by Janet Sorensen  
VERIFY authenticity with eSign Desktop  


**FROM:** Janet M. Sorensen  
Deputy Assistant Inspector General  
for Retail, Marketing, and Delivery

**SUBJECT:** Audit Report – Postal Service Workplace Violence Program  
(Report Number HR-AR-16-004)

This report presents the results of our audit of the U.S. Postal Service's Workplace Violence Program (Project Number 15RG037HR000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Monique P. Colter, director, Human Resources and Support, or me at 703-248-2100.

Attachment

cc: Corporate Audit and Response Management

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# Findings

***The report responds to a request from members of the House Committee on Oversight and Government Reform for the U.S. Postal Service Office of Inspector General (OIG) to review the Postal Service's workplace violence program and validate information the Postal Service provided to Congress regarding sexual assaults.***

## Introduction

This report presents the results of our audit of the U.S. Postal Service's workplace violence program (Project Number 15RG037HR000). The report responds to a request from members of the House Committee on Oversight and Government Reform for the U.S. Postal Service Office of Inspector General (OIG) to review the Postal Service's workplace violence program and validate information the Postal Service provided to Congress regarding sexual assaults. Our objective was to evaluate whether the Postal Service adequately identified, reviewed, reported, and addressed employee assaults. We also validated the Postal Service's response to Congress on March 13, 2015, regarding its workplace violence program and the number of sexual assaults reported by employees during 2013 and 2014. See [Appendix A](#) for additional information about this audit.

The Postal Service has an obligation to ensure the safety of its employees by creating and maintaining a violence-free work environment. Postal Service employees who have been assaulted can notify their manager, file a formal Equal Employment Opportunity (EEO) complaint or grievance with the Postal Service, notify the internal law enforcement organizations [(U.S. Postal Inspection Service or the OIG)] or contact the local police. The Postal Inspection Service investigates assaults and threats against employees, while the OIG investigates allegations of a hostile work environment and sexual harassment. Either can pursue criminal charges or refer cases to the Postal Service for further action. The Postal Service administers administrative action, such as letters of warning, suspensions, and removal of employees as appropriate.

The Postal Service established the Workplace Environment Tracking System (tracking system) as the national tracking and central repository for workplace environment incidents to analyze data, identify trends, and develop preventive measures. The purpose of the tracking system is to collect and record information to achieve its goal of providing a workplace environment that is free of harassment, discrimination, assaults, and threats.<sup>1</sup>

On July 8, 2013, the Postal Service issued a memorandum instructing all headquarters, area, and district offices, starting August 1, 2013, to use the tracking system when managing workplace violence cases. It also has threat assessment teams in each district to respond to and assess violent situations to develop preventive measures for workplace violence. Finally, the Postal Service uses posters to educate employees on identifying and reporting workplace violence incidents.

## Summary

The Postal Service has a comprehensive workplace violence program to identify, review, report, and address employee assaults nationwide. The Postal Service and Postal Inspection Service appropriately addressed all workplace violence cases in the six districts that were judgmentally selected for review due to the high frequency of assaults. In these districts, the Postal Inspection Service investigated 145 assault cases, 60 of which involved Postal Service employees as assailants. The Postal Service imposed administrative actions, including suspensions and notices of removal, against the employees in all 60 cases, as required.

However, opportunities exist to enhance the workplace violence program. Specifically, Postal Service officials did not always record all incidents of workplace violence in the tracking system, effectively use threat assessment teams to review assault outcomes and develop preventive measures for workplace violence, and display all workplace violence posters and publications used to educate employees on identifying and reporting workplace violence incidents at postal facilities.

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<sup>1</sup> Postal Service Publication 108, *Threat Assessment Team Guide*, May 2015.

***Finally, the Postal Service was responsive to Congress by providing information on how it prevents and responds to workplace violence incidents and reporting 68 employee sexual assaults that resulted in EEO complaints. The Postal Service did not report 10 sexual assault cases investigated by the Postal Inspection Service for the period October 1, 2012, through December 1, 2014.***

These and other issues occurred in the six districts we reviewed because:

- District Human Resources managers responsible for maintaining the tracking system database did not ensure responsible officials entered assault complaints into the tracking system, as required. In addition, the policy does not give specific instructions regarding the deadline for doing so.
- There were no controls to ensure that threat assessment teams completed relevant activities, including required training.
- Facility managers were not fully aware of the requirement to display workplace violence posters and were not required to check periodically that all workplace violence posters were displayed.

Finally, the Postal Service was responsive to Congress by providing information regarding how they prevent and respond to workplace violence incidents and in reporting 68 employee sexual assaults that resulted in EEO complaints. However, all sexual assaults do not result in EEO complaints. As such, the Postal Service did not report 10 sexual assault cases investigated by the Postal Inspection Service for the period October 1, 2012, through December 1, 2014.

The Postal Service could not rely on the tracking system as a central repository for the sexual assault data because officials were not always recording the data in the tracking system, as required. To gather complete data for the response to Congress, the Postal Service should have reviewed tracking system data, EEO complaints, and Postal Inspection Service cases.

As a result of these conditions, there is an increased risk the Postal Service will not effectively analyze data, identify trends, and address workplace violence incidents. Furthermore, without a single accurate source of data in this critical area of employee safety, it is more difficult to determine where problems exist and develop preventive measures.

### **Recording Workplace Violence Incidents**

Postal Service personnel did not always identify cases in the tracking system — the national tracking and central repository for workplace violence incidents — as required. To further determine the types of cases not identified in the tracking system, we analyzed 145 assault cases investigated by the Postal Inspection Service in six districts. In these districts, officials did not record 125 of 145 assault cases (86 percent) in the tracking system, as required. See [Table 1](#):

- Seventy-three: non-employees assaulting employees;
- Two: supervisors assaulting employees;
- Forty-three: employees assaulting other employees; and
- Seven: employees assaulting non-employees.

***Based on our review of six districts, these incidents occurred because district Human Resources managers (who are responsible for maintaining the tracking system) did not provide sufficient oversight — such as periodic reviews — to ensure responsible officials entered assault complaints into the tracking system.***

**Table 1. Analysis of Assaults Cases Not in the Tracking System**

<b>District Name</b>	<b>Postal Inspection Service Assault Cases Not in Tracking System</b>	<b>Non-Employees Assaulted Employees</b>	<b>Supervisors Assaulted Employees</b>	<b>Employees Assaulted Employees</b>	<b>Employees Assaulted Non-Employees</b>
Arizona	10	7	2	1	0
South Florida	19	12	0	7	0
Los Angeles	14	7	0	6	1
New York	18	10	0	6	2
Chicago	50	31	0	17	2
Capital	14	6	0	6	2
<b>Total</b>	<b>125</b>	<b>73</b>	<b>2</b>	<b>43</b>	<b>7</b>

Source: OIG analysis March 9, 2016.

Looking nationally, Postal Service officials in 17 of 67 districts (25 percent) did not record all incidents of workplace violence investigated by the Postal Inspection Service in the tracking system.<sup>2</sup> Postal Service officials in 12 of 17 districts (71 percent) recorded five to 50 fewer assault cases in the tracking system than the Inspection Service recorded in its database for the period September 1, 2013, through September 2, 2015. Two of the 12 districts did not record any physical or sexual assault cases in the tracking system whereas, the Postal Inspection Service investigated 14 in each district (see [Appendix B](#)).

All headquarters, area, and district offices are required to use the tracking system when managing cases concerning workplace violence incidents. The tracking system was designed to ensure standardization regarding documentation, operating procedures, and outcome measures when addressing workplace harassment, threats, assaults, and workplace environment issues.

Based on our review of six districts, these incidents occurred because district Human Resources managers (who are responsible for maintaining the tracking system) did not provide sufficient oversight — such as periodic reviews — to ensure responsible officials entered assault complaints into the tracking system. They also did not make it a priority to ensure all workplace violence incidents were recorded in the tracking system and there were no specific instructions regarding the deadline for doing so. In addition, although the Postal Service conducted formal training from July to August 2013, and follow-up training from June to August 2014, on how to navigate through the system, the training did not include specifics about what to record and the deadlines for recording it.

Not recording incidents in the tracking system did not negatively impact the Postal Service addressing the cases we reviewed. However, the Postal Service did not realize the full benefit of the tracking system, which could help analyze data, identify trends, to address workplace violence incidents. Without a single accurate source of data in this critical area of employee safety, it is more difficult to determine where problems exist and to develop preventive measures.

<sup>2</sup> To evaluate whether districts were using the tracking system, we compared the number of cases in the system to the number of cases in the Postal Inspection Service database, by district. If the district recorded fewer cases than the Postal Inspection Service, we determined district officials did not use the tracking system, as required.

***The Postal Service did not always effectively use threat assessment teams to review assault outcomes and develop preventive measures for workplace violence.***

## Threat Assessment Teams

The Postal Service did not always effectively use threat assessment teams to review assault outcomes and develop preventive measures for workplace violence. The three primary tasks of the threat assessment teams are to identify the threat maker and environmental condition, assess the risk level of an incident, and recommend a risk abatement plan to manage an identified incident.<sup>3</sup> Although all threat assessment teams in the six districts we reviewed circulated the zero tolerance policy,<sup>4</sup> five districts did not always comply with the established guidelines<sup>5</sup> for workplace violence prevention measures.

Specifically:

- One of six districts did not identify core threat assessment team members to conduct quarterly meetings. During the course of our audit, this district established core threat assessment team members and initiated the required quarterly meetings.
- Five of six districts did not issue the required outcome memos to address identified incidents and provide further remediation for managing them.
- One of six districts did not conduct mandatory post-incident analysis to ensure corrective actions were completed for priority 1 and 2 cases, which are extreme and high-risk cases (see Table 2 for threat assessment team analysis).

**Table 2. Threat Assessment Team Requirements and District Compliance**

District	Core Team Members Identified	Quarterly Meetings Held	Quarterly Meeting Minutes Circulated	Team Outcome Memo Issued	Analysis Conducted on Priority 1 or 2 Cases	Zero Tolerance Policy Circulated
Chicago	No	No	No	No	No	Yes
South Florida	Yes	Yes	Yes	No	Yes	Yes
New York	Yes	Yes	Yes	No	Yes	Yes
Los Angeles	Yes	Yes	Yes	No	Yes	Yes
Capital	Yes	Yes	Yes	No	Yes	Yes
Arizona	Yes	Yes	Yes	Yes	Yes	Yes

Source: OIG analysis as of October 30, 2015.

<sup>3</sup> Postal Service Publication 108.

<sup>4</sup> Every act or threat of violence, regardless of the initiator, elicits an immediate and firm response, which will result in corrective action up to and including removal from the Postal Service.

<sup>5</sup> Postal Service Publication 108.

**Threat assessment team members in the Chicago, South Florida, and Los Angeles districts did not complete the required training, nor did the postmasters and supervisors in these districts.**

**Core members of the district threat assessment team include the Human Resources manager, the district manager or operations designee, the Labor Relations manager, the safety manager, the senior plant manager or operations designee, and a postal inspector.**

Additionally, threat assessment team core members<sup>6</sup> must complete four courses<sup>7</sup> and facility managers must complete one course<sup>8</sup> of workplace violence awareness. Threat assessment team members in the Chicago, South Florida, and Los Angeles districts did not complete the required training, nor did the postmasters and supervisors in these districts (see Table 3). A detailed analysis of the districts' threat assessment teams and managerial level officials that did not complete the required workplace violence training is illustrated in [Appendix C](#).

**Table 3. Workplace Violence Training**

District	Did threat assessment team members complete required training?	Did all postmasters, managers, and supervisors complete required training?
Chicago	No	No
South Florida	Yes	No
New York	Yes	Yes
Los Angeles	No	No
Capital	Yes	Yes
Arizona	Yes	Yes

Source: OIG analysis as of October 30, 2015.

Core members of the district threat assessment team include the Human Resources manager, the district manager or operations designee, the Labor Relations manager, the safety manager, the senior plant manager or operations designee, and a postal inspector. Some of their responsibilities as members include:

- Human Resources Manager – coordinates and oversees the threat assessment team.
- District Manager or Operations Designee – provides knowledge on minimizing disruption of worksite operations and provides information about security needs.
- Labor Relations Manager – provides guidance on issues regarding an employee's work status and serves as a resource regarding administrative action.
- Safety Manager – communicates relevant information to the threat assessment team and suggests preventative measures and safety talks.
- Senior Plant Manager – provides information on how to minimize disruption of worksite operations and security needs.
- Postal Inspector – conducts a formal investigation of an incident deemed to be criminal in nature and prepares an investigative memorandum or assault threat specialty report and submits it to Postal Service management.

<sup>6</sup> Core members of the district threat assessment team include the Human Resources manager, who oversees the team; the Labor Relations manager, the safety manager, the district manager or operations designee, the senior plant manager or operations designee, and a postal inspector.

<sup>7</sup> The four courses include 100014893, Workplace Violence Awareness Training; 10015903, Threat Assessment Team Training; 10022408, Bullying and Violence in the Workplace; and 10021576, Coping with Aggressive Behavior in the Workplace.

<sup>8</sup> 100014893, Workplace Violence Awareness Training

The required actions were not taken because there were no controls to ensure that threat assessment team activities were completed; and that threat assessment team members, postmasters, and supervisors in three districts did not complete the required threat assessment team training. Threat assessment team members are required to conduct quarterly meetings, prepare and circulate meeting minutes and outcome memos, and conduct analysis on priority 1 or 2 cases.<sup>9</sup> Additionally, district officials must circulate the zero tolerance policy.

If there is no oversight to ensure that threat assessment teams are completing relevant activities, there is an increased risk the team will not achieve its primary mission of preventing and mitigating workplace violence.

## Workplace Violence Posters and Publications

Managers at 11 of 12 facilities we reviewed did not ensure that workplace violence posters and publications were on display (see [Table 4](#)).

Specifically, of the 12 facilities:

- Eight did not display Poster 62, *Achieving a Violence-Free Workplace Together*.
- Two did not display Poster 72, *Equal Employment Opportunity is the Law*.
- Nine did not display Poster 128, *To Them Their Comments Are Harmless: To Her They Are Offensive*.
- Eight did not display Poster 143, *This is Serious Business*.
- Six did not display Poster 159, *Workplace Harassment: Know Your Rights! Take Responsibility!*
- Three did not display the zero tolerance policy letter.

**HOVER OVER EACH POSTER TO REVEAL MORE INFO**

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<sup>9</sup> Priority 1 cases are extreme risk cases where there is a clear and immediate threat of violence to a specific target. Priority 2 cases are high-risk cases where there is a threat of violence but no immediacy or specific target.

**Table 4. Workplace Violence Posters and Publications**

<b>District</b>	<b>Facility</b>	<b>Poster 62</b>	<b>Poster 72</b>	<b>Poster 128</b>	<b>Poster 143</b>	<b>Poster 159</b>	<b>Zero Tolerance Policy</b>
Chicago	Buchanan	No	No	No	No	No	Yes
Chicago	Rogers Park	No	Yes	No	No	No	Yes
Los Angeles	Alameda	No	Yes	No	No	Yes	Yes
Los Angeles	LA PDC	No	Yes	No	No	Yes	Yes
New York	Times Square	Yes	Yes	No	No	No	No
New York	Morgan PDC	Yes	Yes	No	Yes	Yes	Yes
South Florida	Buena Vista	No	Yes	No	No	No	Yes
South Florida	West Palm Beach PDC	Yes	Yes	Yes	No	No	Yes
Capital	Rockville	No	Yes	Yes	Yes	Yes	No
Capital	Silver Spring	No	No	No	No	No	No
Arizona	Tucson	Yes	Yes	Yes	Yes	Yes	Yes
Arizona	Maryvale	No	Yes	No	Yes	Yes	Yes
<b>Total Posters Displayed</b>		<b>4</b>	<b>10</b>	<b>3</b>	<b>4</b>	<b>6</b>	<b>9</b>
<b>Total Posters Not Displayed</b>		<b>8</b>	<b>2</b>	<b>9</b>	<b>8</b>	<b>6</b>	<b>3</b>

Source: OIG analysis as of October 30, 2015.

The Postal Service indicated there are five workplace violence posters that must be displayed at postal facilities. Posters are displayed on employee bulletin boards and are available on the Postal Service’s website. The posters discuss what to do in the event of violent behavior and make it clear that there are multiple authorities to whom employees can report their allegations.

This occurred because facility managers were not fully aware of the requirements to display workplace violence posters and were not required to periodically check to ensure all posters were properly displayed. Educating employees, supervisors, and managers concerning their rights and responsibilities is critical to ensuring that criminal behavior or misconduct of a sexual nature is recognized, reported, and dealt with promptly. In order for workplace violence posters to be effective in educating Postal Service employees, they must be adequately displayed. As a result, there is an increased risk employees may not be sufficiently educated to recognize and report criminal behavior or sexual misconduct.

## Sexual Assault Statistics Reported to Congress

The Postal Service was responsive to Congress by providing information regarding how it prevents and responds to workplace violence incidents and in reporting 68 employee sexual assaults that resulted in EEO complaints. However, all sexual assaults do not result in EEO complaints. As such, the Postal Service did not report 10 sexual assault cases investigated by the Postal Inspection Service for the period October 1, 2012, through December 1, 2014. Eight of the 10 cases investigated involved customers assaulting employees and two cases involved employees assaulting other employees.

***The Postal Service did not provide complete data to Congress because Postal Service officials only used EEO complaint data related to sexual assaults as defined by Title 18 of the U.S. Code, which defines sexual assault as abusive sexual contact.***

The Postal Service did not provide complete data to Congress because Postal Service officials only used EEO complaint data related to sexual assaults as defined by Title 18 of the U.S. Code,<sup>10</sup> which defines sexual assault as abusive sexual contact.<sup>11</sup> In addition, the Postal Service could not use the tracking system as a central repository for sexual assault data because officials were not recording sexual assault incidents in the tracking system, as required.

For a complete assessment of sexual assaults at the Postal Service, officials should have assessed tracking system data, EEO complaints, and Postal Inspection Service cases. Without those elements management and Congress may not be fully aware of the degree of workplace violence at the Postal Service.

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<sup>10</sup> Chapter 109A, Section 224

<sup>11</sup> Sexual contact is defined as intentional physical touching, either directly or through the clothing, with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person.

# Recommendations

***We recommend management establish additional controls, such as periodic reviews of the Workplace Environment Tracking System database, to ensure responsible officials enter assaults into the tracking system.***

## Recommendations

We recommend the chief Human Resources officer and executive vice president:

1. Establish additional controls, such as periodic reviews of the Workplace Environment Tracking System database, to ensure responsible officials enter assaults into the tracking system.
2. Develop mandatory training to ensure responsible personnel are adequately trained on use of the Workplace Environment Tracking System and can identify incidents that should be entered into the tracking system.
3. Establish oversight controls to ensure that threat assessment teams comply with established guidelines and perform their roles and responsibilities, as required.
4. Develop controls to ensure that threat assessment team members and responsible facility management, postmasters, and supervisors complete required threat assessment team training.
5. Develop requirements for facility managers to perform periodic reviews to ensure workplace violence posters are displayed as required.

## Management's Comments

In their written response, management partially agreed with our findings, agreed with one recommendation, and disagreed with four recommendations. However, in subsequent meetings, management provided alternate corrective actions for these recommendations. The discussion below summarizes their written response and the results of the follow-up meetings.

Written Response: Management disagreed with our statement that “the Postal Service is at risk of not being able to effectively analyze data and identify trends to address workplace violence incidents” because they viewed the conclusion as inconsistent with other conclusions in the report. Additionally, management stated that the tracking system is a “newly established protocol” and that over time and through communication and oversight, they have seen improved data reporting since implementation. Finally, management did not agree that the Postal Service should have only one data source to capture incidents of workplace violence and that having multiple data systems does not hamper their ability to analyze data or identify trends regarding workplace violence. In conclusion, the Postal Service noted that it has been at the forefront in addressing the issue of workplace violence. It continues to perfect long-standing efforts to educate employees, supervisors, and managers concerning their rights and responsibilities to ensure that criminal behavior or misconduct that rises to the level of sexual harassment/assault is recognized, reported, and dealt with promptly.

Management disagreed with recommendation 1, stating that they have procedures in place to provide appropriate controls to ensure that responsible officials are properly entering the requested information into the tracking system. Management stated that district threat assessment teams are responsible for reviewing incidents and entering case information into the tracking system.

Management disagreed with recommendation 2, stating that their existing process for training users of the tracking system is responsive to our recommendation. Management stated the district Human Resources manager, two district designees, and two employees designated by the Human Resources manager are currently trained on the tracking system database. The tracking system training for district and area Human Resources managers includes a section on determining in which of the four modules of the tracking system an incident should be entered.

Management disagreed with recommendation 3, stating that their existing process for ensuring that threat assessment teams comply with established guidelines and perform their roles and responsibilities is responsive to our recommendation. Management stated the area TACT role was established in 2012 to provide oversight and follow up with district threat assessment teams. The area Human Resources manager designates an employee to act in the contact advisor role.

Management disagreed with recommendation 4, stating that their existing procedures to provide appropriate controls to ensure that threat assessment team members complete required training is responsive to our recommendation. Management stated that Publication 108 requires all core members to complete threat assessment team training. Postal Service Headquarters' Workplace Environment Intervention (WEI) staff members monitor area and district threat assessment teams to ensure compliance with training requirements.

Management agreed with recommendation 5, and subsequently provided a memo dated September 14, 2016, reminding them of the Postal Service's obligation to display all required posters.

Subsequent Meetings: In subsequent discussions with the Chief Human Resources Officer to resolve their disagreement on the recommendations, management proposed alternate actions as follows:

Regarding recommendations 1 through 4, the Postal Service intends to reiterate requirements regarding adherence to established controls for tracking and inputting appropriate information into the tracking system database and training protocols at their upcoming Area Managers, Human Resources/Labor Relations meeting in Denver, Colorado on September 27 and 28, 2016.

See [Appendix D](#) for management's comments in their entirety.

## **Evaluation of Management's Comments**

The OIG considers management's alternate actions responsive to recommendations 1, 2, 3, and 4 and their response to recommendation 5 responsive.

Regarding management's assertion that the overall conclusion in the report is inconsistent with other conclusions in the report, our findings that workplace violence incidents were not always recorded in the tracking system, threat assessment teams were not always effective or nonexistent, and information concerning workplace violence was not always on display is consistent with our overall conclusion that the Postal Service is at risk of not being able to effectively analyze data and identify trends to address workplace violence incidents.

We disagree with management's position that the tracking system is a newly established protocol, as it was implemented and mandated for use in August 2013. The memo requiring use stated that all headquarters, area, and district offices are mandated to use the tracking system when managing workplace violence cases starting August 1, 2013.

Finally, management stated they did not agree that the Postal Service should have only one data source to capture incidents of workplace violence. The intent of our finding was not that the Postal Service only have one data source; but that the Postal Service realize the full benefit of the tracking system by using it to capture all workplace violence incidents. We agree postal employees have contractual and statutory rights regarding the issue of sexual harassment and sexual assaults. The information can be contained in several data sources as applicable; however, having one central data source with limited information to

protect personal identifiable information of employees but complete to assess the type of incident will significantly aid the Postal Service in its ability to analyze data, identify trends and generate statistical data. The memo requiring use of the tracking system was signed by the vice president, Labor Relations on July 8, 2013, and stated that the EEO Compliance and Appeals and the WEI departments developed the tracking system to provide a national tracking and central repository for workplace environment incidents and stated that all headquarters, area, and district offices are mandated to use the tracking system when managing workplace violence cases starting August 1, 2013.

We consider recommendation 5 closed with the issuance of this report. The OIG requests written confirmation when corrective actions for recommendations 1-4 are completed. These recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

# Appendices

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## Appendix A: Additional Information

***The Postal Service has an obligation to ensure the safety of its employees by creating and maintaining a violence-free work environment. Workplace violence can occur at or outside of the workplace and can range from threats and verbal abuse to physical assaults and homicides.***

### Background

The Postal Service has an obligation to ensure the safety of its employees by creating and maintaining a violence-free work environment. Workplace violence can occur at or outside of the workplace and can range from threats and verbal abuse to physical assaults and homicides.

On March 13, 2015, the Postal Service responded to a congressional inquiry outlining what it does to determine and address employee sexual assaults and harassment; the consequences postal employees may face when found to be sexually assaulting or harassing another employee; how it handles situations where the superior is the harasser; and what Human Resources' process, procedure, or recourse is in place for employees who have been assaulted, abused, or harassed. On June 12, 2015, the OIG received a request from members of the House Committee on Oversight and Government Reform to review the Postal Service's workplace violence program and validate the information provided to Congress by the Postal Service on March 13, 2015.

In an effort to proactively address workplace violence, the Postal Service enhanced its tracking capabilities. In August 2013, the Postal Service established the tracking system as the national tracking and central repository for workplace environment incidents and required that it be used to manage all workplace environment incidents, including workplace violence cases. Another strategy to reduce workplace violence was the formation of threat assessment teams to reduce risks to employees and the Postal Service, discourage inappropriate behavior, and resolve conflicts. In addition, to advise employees of what to do in the event of violent behavior, the Postal Service requires every postal facility to display workplace violence posters and publications. Postal Service employees who have been assaulted can file a formal EEO complaint or grievance with the Postal Service; notify the Postal Inspection Service, OIG, or their manager; or contact the local police.

The Postal Inspection Service investigates employment-related assaults and threats against employees, documents these investigative details in its database, and issues memorandums of investigation to the Postal Service on the outcome of the investigation. The OIG investigates allegations of hostile work environment and sexual harassment.

### Objective, Scope, and Methodology

Our objective was to evaluate whether the Postal Service adequately identified, reviewed, reported, and addressed employee assault complaints. We also validated the Postal Service's March 13, 2015, response to Congress. The scope of our review was physical and sexual assaults that occurred from fiscal year (FY) 2012, Quarter (Q) 3, through FY 2015, Q3.

To accomplish our objective, we:

- Obtained, reviewed, and evaluated relevant policies or procedures regarding the Postal Service's workplace violence program.
- Reviewed the OIG Security Risk Model<sup>12</sup> for FY 2015, Qs 2 and 3, regarding workplace violence incidents; four judgmentally selected high-risk districts and facilities (Chicago, New York, Los Angeles, and South Florida); Arizona District best practices; and the Capital District (as a follow-up to a prior OIG report).
- Interviewed Postal Service and Postal Inspection Service personnel regarding workplace violence to determine their roles and responsibilities.

<sup>12</sup> The OIG Security Risk Model incorporates workplace violence data from Postal Inspection Service cases, Hotline complaints, grievances, and employee accidents; identifies selected areas of security risk at the area, district, and facility levels; and facilitates audit work and related oversight activities.

- Analyzed data from the tracking system, Postal Inspection Service database, and iComplaints<sup>13</sup> to identify workplace violence cases and determine if districts were using the tracking system, as required.
- Reviewed workplace violence case files for incident reports in the Arizona, Capital, Chicago, New York, Los Angeles, and South Florida districts to determine if postal officials handled the cases properly.
- Validated the Postal Service’s March 13, 2015, response to Congress regarding its workplace violence program.

We conducted this performance audit from August 2015 through September 2016, 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 on July 29, 2016, and included their comments where appropriate.

We assessed the reliability of workplace violence data in iComplaints, Postal Inspection Service database, and the tracking system by reviewing existing information about the data and interviewing agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

### Prior Audit Coverage

Report Title	Report Number	Final Report Date	Monetary Impact (in millions)
<i>Security Risks in the Capital District</i>	<a href="#">HR-MA-14-003</a>	01/27/2014	None

**Report Results:** The OIG concluded that the Capital District did not have an effective anonymous mail program in place to prevent potentially dangerous mail from entering the mailstream and a workplace violence program to mitigate violence. The OIG recommended management clarify employee roles and responsibilities, require personnel take additional training, implement anonymous mail program best practices, complete the workplace violence self-audit tool, and establish controls to ensure compliance with anonymous mail and workplace violence requirements. Management agreed with the recommendations and provided details of their actions plans and target implementation dates.

<sup>13</sup> A tracking system used to record all activities associated with EEO administrative processes and civil actions.

## Appendix B: Comparison of Cases in Postal Inspection Service Database to Workplace Environment Tracking System

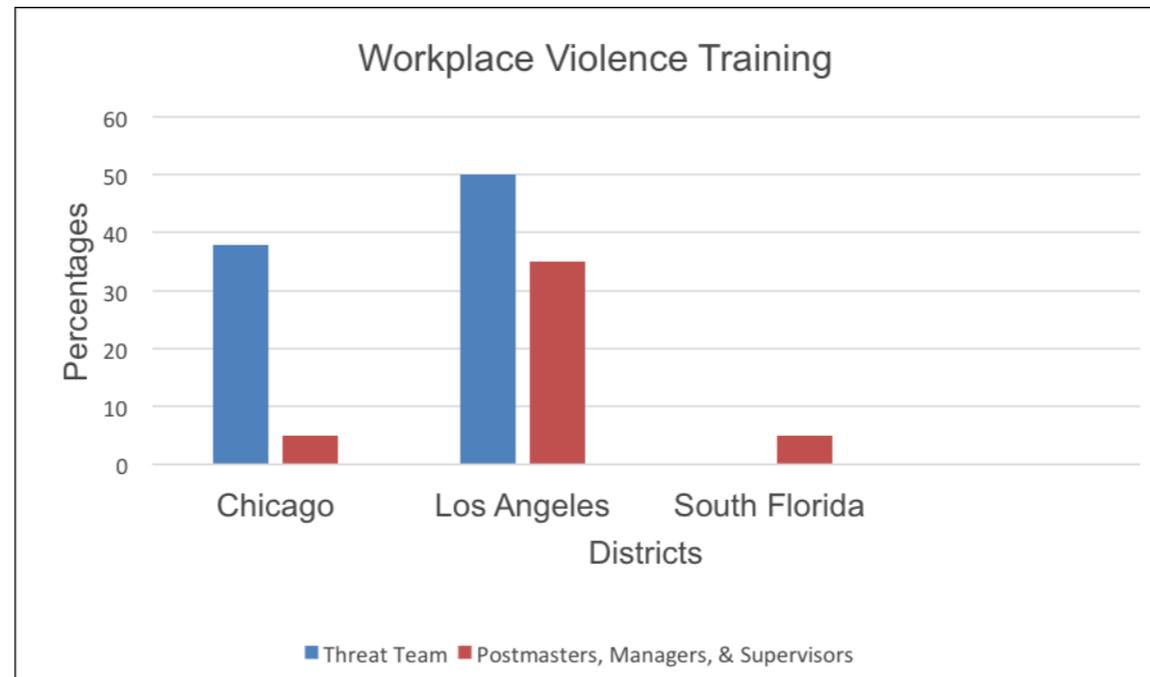
To show whether districts were using the tracking system, we compared the number of cases in the tracking system to the number of cases in the Postal Inspection Service database, by district. Postal Service officials in 17 of 67 districts (25 percent) recorded fewer assaults investigated by the Postal Inspection Service in the tracking system. We further identified 12 of the 17 districts that recorded 5 to 50 fewer cases in the tracking system than the Postal Inspection Service recorded in its database for the period September 1, 2013, through September 2, 2015 (see Table 5).

**Table 5. Workplace Violence Case Comparative Analysis by Area and District**

Area/District		Number of Workplace Environment Tracking System Cases	Postal Inspection Service Sexual and Physical Assault Cases	Difference Between Cases in Workplace Environment Tracking System and Postal Inspection Service Database
<b>Capital Metro Area</b>				
1	Baltimore	1	7	6
2	Capital	0	14	14
3	Northern Virginia	1	10	9
<b>Eastern Area</b>				
4	Central Pennsylvania	7	9	2
5	Northern Ohio	2	13	11
6	Western New York	4	5	1
<b>Great Lakes Area</b>				
7	Chicago	2	52	50
8	Detroit	3	18	15
9	Gateway (St. Louis)	26	30	4
<b>Northeast Area</b>				
10	New York	8	26	18
<b>Pacific Area</b>				
11	Bay Valley	9	12	3
12	Los Angeles	0	14	14
<b>Southern Area</b>				
13	Arkansas	1	20	19
14	South Florida	7	26	19
<b>Western Area</b>				
15	Arizona	3	13	10
16	Hawkeye	2	16	14
17	Seattle	16	17	1

Source: OIG analysis as of March 9, 2016.

## Appendix C: Workplace Violence Training



Analysis of Chicago, Los Angeles and South Florida districts training records as of September 17, 2015

The above table illustrates the three districts where the threat assessment team and managerial level officials did not complete the required workplace violence training. Below is the break down of the districts officials' noncompliance with required training:

- Chicago: Three of eight threat assessment team members (38 percent) and 14 of 273 postmasters, managers, and supervisors (5 percent) did not complete their respective training.
- Los Angeles: Eight of 16 threat assessment team members (50 percent) and 29 of 82 postmasters, managers, and supervisors (35 percent) did not complete their respective training.
- South Florida: Although all threat assessment team members complied with the training requirement, 33 of 561 postmasters, managers, and supervisors (6 percent) did not complete their respective training. As of October 8, 2015, South Florida District officials stated that 21 of the 33 managers and supervisors were on extended leave or military leave. Of the remaining 12, four have not taken the training.

## Appendix D: Management's Comments

JEFFREY C. WILLIAMSON  
CHIEF HUMAN RESOURCES OFFICER  
AND EXECUTIVE VICE PRESIDENT



August 24, 2016

SHERRY FULLWOOD  
ACTING DIRECTOR, AUDIT OPERATIONS

SUBJECT: Postal Service's Workplace Violence Program  
(Report Number HR-AR-16-DRAFT)

This is in response to the OIG Audit report dated August 3, 2016, and recommendations concerning the Postal Service's Workplace Violence Program. The audit's objectives were to "evaluate whether the Postal Service adequately identified, reviewed, reported, and addressed employee assaults; and to validate the Postal Service's response to Congress."

With regard to the audits objectives your report concludes that the Postal Service both addressed all workplace violence cases reviewed and was responsive to the congressional request. As stated on page 2, "The Postal Service and Postal Inspection Service appropriately addressed all workplace violence cases in the six districts that were judgmentally selected for review due to the high frequency of assaults." Additionally the report states again on page 2, "Finally, the Postal Service was responsive to Congress by providing information regarding how they prevent and respond to workplace violence incidents and in reporting 68 employee sexual assaults that resulted in EEO complaints."

The report then goes on to conclude that the Postal Service is at an increased risk of not being able to "effectively analyze data and identify trends to address workplace violence incidents." The Postal Service does not concur with this conclusion and finds it inconsistent with the findings above. Your conclusion is predicated on two findings:

1. Six out of 67 districts had deficiencies in adhering to newly established protocols for reporting incidents of workplace violence in the Workplace Environment Tracking System (WETS).
2. The Postal Service lacks a single data source to capture incidents of workplace violence.

475 L'Enfant Plaza SW  
Washington DC 20260-4000  
www.usps.com

As you noted, the WETS was implemented in late fiscal year 2013 to augment our existing efforts to capture incidents of workplace violence. It is not uncommon when new systems are implemented for there to be a transition period to achieve desired results. This is the case with the WETS. Over time and through communication and oversight, we have seen improved results in data reporting since implementation.

Lastly, we disagree with the OIG's premise that we should have one data source to capture allegations of violent behavior, discriminatory behavior, sexual harassment, sexual assault, and other forms of harassment. Our employees have contractual and statutory rights regarding the issue of sexual harassment/assault and therefore, we are going to have data systems specific to these complaint forums. That is a business necessity based on our reporting requirements for those separate appeal forums. It is neither realistic nor a sound business decision to have a single data system for this purpose. Nor does having multiple data systems to capture the aforementioned allegations hamper our ability to analyze data or identify trends regarding workplace violence.

The Postal Service has been at the forefront with regard to addressing the issue of workplace violence. We continue to perfect our long-standing efforts to educate our employees, supervisors and managers concerning their rights and responsibilities to ensure that criminal behavior or misconduct that rises to the level of sexual harassment/assault is recognized, reported, and dealt with promptly.

The following responses address each recommendation.

**Recommendation #1:**

Establish additional controls, such as periodic reviews of the Workplace Environment Tracking System database, to ensure responsible officials enter assaults into the tracking system.

**Response:**

We believe our existing procedures provide the appropriate controls to ensure responsible officials are properly entering the requested information into the tracking system.

Each District, Area, and Headquarters unit is responsible for reporting allegations of threats and assaults into the Threat Assessment Case Tracking (TACT) module of the WETS database. The Headquarters WETS Team tracks the activities of the WETS database. The team conducts quarterly and end-of-year audits of the WETS national database. The audits determine whether Districts are in compliance and meet performance expectations. We have also developed a WETS TACT Audit Review Process to conduct random audits of Area and District TACT module cases which allows the Areas to provide feedback to the Districts regarding compliance.

In addition to the above-referenced monitoring activities, the Headquarters WEI group forwards Watch Desk reports involving assaults to the WETS Area Liaisons and Area Threat Assessment Team (TAT) Contacts. The District TATs are responsible for reviewing the incident and entering the case into the WETS TACT module. When an incident regarding a field employee is reported directly to the Headquarters WEI group, the Headquarters WEI group forwards the allegation to the Area Manager Human Resources. The Area Manager Human Resources is responsible for determining the appropriate steps to take to deal with these types of reported incidents.

The Headquarters WEI group also conducts quarterly and end-of-year teleconferences with the Area TAT Contacts and WETS Area Liaisons and reviews the WETS TACT Compliance Report. The Inspection Service's Assault Threat Specialty Report (ATSR) is also discussed during these teleconferences.

**Recommendation #2:**

Develop mandatory training to ensure responsible personnel are adequately trained on use of the Workplace Environment Tracking System and can identify incidents that should be entered into the tracking system.

**Response:**

We believe our existing process for training users of the WETS is responsive to this recommendation.

The following positions are currently trained on the use of the WETS database: District, Human Resources Manager, two district designees and two employees designated by the Area Human Resources Manager. In addition, the Headquarters WETS Team conducts teleconferences with the WETS Area Liaisons on database enhancements to ensure proper utilization. Area Liaisons are responsible for training new WETS users. The Headquarters WETS Team provides individual and small group training to new users or as refresher training on an as-needed basis. We also provide users the WETS Frequently Asked Questions (FAQ) and a WETS User Guide.

WETS training for District and Area Human Resources Managers includes a section on determining which of the four modules in WETS an incident should be entered. These modules are Initial Management Inquiry (IMI), Workplace Harassment Fact Finding (WHFF), TACT and Workplace Environment Intervention (WEI).

**Recommendation 3 :**

Establish oversight controls to ensure that threat assessment teams comply with established guidelines and perform their roles and responsibilities, as required.

**Response:**

We believe our existing process for ensuring that threat assessment teams comply with established guidelines and perform their roles and responsibilities is consistent with this recommendation.

The Area TACT role was established in 2012 to provide oversight and follow up with District TATs. The employee performing the Contact Advisor role is selected by the Area Human Resources Manager. The role was formalized as one of the revisions in the May 2015, Publication 108, Threat Assessment Team Guide, as follows:

3-2.4.6 Area Threat Assessment Team Contacts

- Oversee the Area TAT Compliance Measures.
- Monitoring District TATs' Compliance Measures using the TAT Membership and Meeting Tool.
- Reviewing Districts' quarterly TAT Meeting Minutes.
- Reviewing Districts' Annual TAT Self-Audit.
- Ensuring Districts' disseminate and post their annual *Zero Tolerance Policy and Reporting Procedures*.
- Ensuring Districts' Core Team Members complete the TAT Team Training Course #10015093 Core Team Members must also complete the current Advanced TAT Training. (Pub. 108 pg.12)

**Recommendation 4:**

Develop controls to ensure that threat assessment team members and responsible facility management, postmasters, and supervisors complete required threat assessment team training.

**Response:**

We believe existing procedures provide appropriate controls to ensure that threat assessment members complete required training consistent with this recommendation.

The TAT Guide, Publication 108, dated May 2015, requires all core members to complete the TAT Training. The Headquarters WEI staff monitors the Areas and District TATs to ensure compliance with training requirements. They conduct quarterly and end-of-year audits which provide confirmation of core team members' training completion for all TATs (HQ, Area, Districts). The TAT

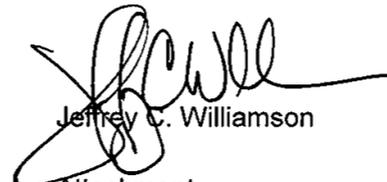
Membership and Meeting Tool Report is sent to the Area Human Resource Managers with a copy to the District Human Resource Managers and Area TAT Contacts regarding their compliance performance.

**Recommendation #5**

Develop requirements for facility managers to perform periodic reviews to ensure workplace violence posters are displayed as required.

**Response:**

We agree with the recommendation. We will provide a letter to all District managers reminding them of our obligation to post all required posters. This letter will be in addition to current posting requirements for workplace violence posters and will be sent no later than September 3, 2016.



Jeffrey C. Williamson  
Attachment

cc: Mr. Cottrell  
Mr. Tulino  
Manager, Corporate Audit and Response Management



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