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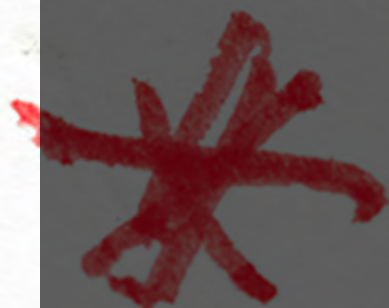
UNITED STATES POSTAL SERVICE

U.S. Postal Service
Government
Relations
Responsiveness
to Congressional
Requests

Management Advisory Report

Report Number
HR-MA-16-002

January 28, 2016



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Highlights

Background

This report presents the results of our review of the U.S. Postal Service Government Relations and Public Policy Office's (Government Relations) responsiveness to congressional requests.

Government Relations receives congressional requests from members of Congress or chairmen and ranking members of oversight committees and subcommittees. Some requests are informal, such as telephone calls or emails. Government Relations also receives "questions for the record" (QFR), which result from congressional hearings. Government Relations assigns personnel to research, write, and review responses within 10 business days.

Postal Service field offices also receive congressional requests on local issues. They are authorized to respond to these requests directly within 7 business days.

Our objective was to assess Government Relations' management of congressional requests and inquiries it received from fiscal years 2011 through 2014. During that time, Government Relations received over 18,500 congressional letters and 12 QFRs.

Of the 210 cases we reviewed, 143 congressional requests were submitted directly to and responded to by Government Relations. The mean, median, and mode response time for the 143 cases were 10, 10, and 11 business days, respectively.

Other Postal Service departments received and responded to the remaining 67 requests.

What The OIG Found

Government Relations did not consistently respond to congressional requests in a timely manner. Of the 143 requests, Government Relations did not respond to 25 requests (17 percent) within their internal goal of 10 business days. These responses ranged from 1 to 41 business days late. The mean, median, and mode response time for the 25 late cases were 20, 14, and 12 business days, respectively.

In addition, we could not identify the date of receipt for 49 of 143 requests (34 percent) because the date stamps were missing or illegible. Further, Government Relations did not account for the time between the date the request was received and the date it was assigned to personnel, which ranged from 1 to 27 days for the remaining 94 requests. The mean, median, and mode for these cases were 6, 4, and 2 business days, respectively. Had these days been included, the response delays would have been greater.

Government Relations also did not always document the date of all requests including emails. While we recognize that not every form of correspondence (such as telephone calls) needs to be documented, it is important that essential elements, such as the date a request is received, are tracked.



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UNITED STATES POSTAL SERVICE

Additionally, of the 143 requests, we found only one case where Government Relations notified the requestor when it received such a request and did not advise requestors of any time delays.

We also reviewed 12 QFRs and found that, although Government Relations responded to all of them on time and requested extensions when needed, its policies and procedures for responding to QFRs were not in a formal, published format to ensure continuity of business processes.

Finally, the Postal Service policy does not prioritize requests from individual members of Congress and instead treats these requests as if they were submitted under the Freedom of Information Act. This policy does not recognize individual Congress members' need for information to carry out their legislative duties.

Procedural discrepancies contributed to the delays and we did not find any evidence that the Postal Service intended to be nonresponsive. Government Relations' practice was to start its 10 business day clock when a request was assigned to personnel based on staff availability and workload. Its standard operating procedures did not address when to start the clock for responding to congressional requests or require personnel to document request dates, acknowledge receipt of requests, or notify requestors of delays.

Five federal agencies we benchmarked against had published policies for responding to congressional requests and began counting their response period the day they received the letter from Congress. Two agencies date stamped correspondence or recorded the receipt date in their tracking system, two acknowledged receipt of emails, and two notified requestors of delays. Two of the five agencies published their procedures and response times for QFRs in a formal correspondence handbook.

Without specific policies, Government Relations may delay responding to congressional requests, which could negatively impact relations between Congress and the Postal Service. In addition, Government Relations should carefully consider any requests received from a member of Congress to enhance transparency and strengthen relations between Congress and the Postal Service.

What The OIG Recommended

We recommended management develop and publish internal and external policies to include, but not limited to, starting response periods when requests are received, establishing response due dates, date stamping incoming correspondence, documenting the date of request for all incoming email requests, sending notifications when requests are received or responses will be delayed, and responding to QFRs. We also recommended management revise policies to designate requests from individual members of Congress as having appropriate priority to promote transparency and positive relations.


Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

January 28, 2016

MEMORANDUM FOR: RONALD A. STROMAN
DEPUTY POSTMASTER GENERAL AND CHIEF
GOVERNMENT RELATIONS OFFICER

E-Signed by Janet Sorensen
VERIFY authenticity with eSign Desktop


FROM: Janet M. Sorensen
Deputy Assistant Inspector General
for Revenue and Resources

SUBJECT: Management Advisory Report – U.S. Postal Service
Government Relations Responsiveness to Congressional
Requests (Report Number HR-MA-16-002)

This report presents the results of our review of the U.S. Postal Service Government Relations Responsiveness to Congressional Requests (Project Number 15RG022HR000).

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

From FY 2011 through FY 2014, Government Relations reported over 18,500 congressional letters in the CTS

Government Relations did not consistently respond to congressional requests in a timely manner. Of the 143 requests, Government Relations did not respond to 25 requests within their internal goal of 10 business days.

Introduction

This report presents the results of our self-initiated review of the U.S. Postal Service Government Relations and Public Policy Office's (Government Relations) responsiveness to congressional requests (Project Number 15RG022HR000). Our objective was to assess Government Relations' management of congressional requests and inquiries. See [Appendix A](#) for additional information about this report.

Members of Congress submit requests to Government Relations, usually seeking assistance on behalf of their constituents on issues such as mail delivery and employee grievances. Legislative requests can also come in a letter from a chairman or ranking member of Congress on behalf of an oversight committee or subcommittee. Some requests are informal, such as telephone calls or emails. "Questions for the Record" (QFR) are a different type of request, which stem from congressional hearings.

When Government Relations receives a request, it assigns personnel to scan it and any appropriate corresponding information into the Correspondence Tracking System (CTS). Personnel must research, write, and review official responses within their internal goal of 10 business days. Postal Service field offices also receive congressional requests regarding local issues and are authorized to respond directly to those requests within their internal goal of 7 business days.

From fiscal year (FY) 2011 through FY 2014, Government Relations reported over 18,500 congressional letters in the CTS. It received 12 QFRs in that period, although it does not track them in the CTS. Of the 210 cases we reviewed, 143 congressional requests were submitted directly to and responded to by Government Relations. The mean, median, and mode response time for the 143 cases were 10, 10, and 11 business days, respectively. Other Postal Service departments received and responded to the remaining 67 cases.

Summary

Government Relations did not consistently respond to congressional requests in a timely manner. Of the 143 requests, Government Relations did not respond to 25 requests within their internal goal of 10 business days. These responses ranged from 1 to 41 business days late.

In addition, we could not identify the date of receipt for 49 of the 143 requests (34 percent) because the date stamps were missing or illegible. Further, Government Relations did not account for the time between the date the request was received and the date it was assigned to personnel, which ranged from 1 to 27 days for the remaining 94 of the 143 requests. Also, it did not always document the date of request for all requests including emails. Additionally, of the 143 requests, we found only one case where Government Relations notified the requestor when it received such a request and did not advise any requestors that responses would be delayed.

We also reviewed 12 QFRs and found that, although Government Relations responded to all of them on time and requested extensions when needed, its policies and procedures for responding to QFRs were not in a formal, published format to ensure continuity of business processes.

Finally, Postal Service policy does not prioritize requests from individual members of Congress and treats those requests as if they were submitted under the Freedom of Information Act (FOIA). This policy does not recognize the lawmakers' need for information to carry out their legislative duties.

Procedural discrepancies contributed to delayed responses and we did not find any evidence the Postal Service intended to be nonresponsive. Government Relations' standard operating procedures (SOP) did not address when to start the clock for responding to congressional requests and require personnel to document the dates of requests, acknowledge receipt of requests, and notify requestors of delays. Government Relations' practice was to start its 10 business day clock when it assigned personnel a request based on staff availability and workload.

Five federal agencies that we benchmarked against had published policies for responding to congressional requests and began counting their response period the day they received the letter from Congress. Two agencies date stamped correspondence or recorded the receipt date in their tracking system, two acknowledged receipt of emails, and two notified requestors of delays. Two of the five agencies published their procedures and response times for QFRs in a formal correspondence handbook.

Without clear, specific policies, Government Relations may delay responses to congressional requests, which could negatively impact relations between Congress and the Postal Service. In addition, Government Relations should carefully consider any request from a member of Congress to enhance transparency and strengthen relations between Congress and the Postal Service.

Congressional Request Processes Needs Improvement

In 210 congressional request cases we reviewed, which included 205 statistically selected cases from the CTS and five based on concerns from members of Congress, Government Relations did not:

- Respond to congressional requests in a timely manner.
- Acknowledge receipt of requests by date stamping incoming correspondence.
- Document the date of requests for all correspondence, including emails.
- Notify the requestor when the request was received.
- Notify requestors of delays.

In addition, Government Relations' policies and procedures for QFRs were not published in a formal format.

We also benchmarked against five federal agencies' procedures for receiving and responding to congressional requests. Specifically, we inquired about:

- Response time
- Start of response time
- Acknowledging receipt of request
- Time extension requests
- QFR procedures

See [Appendix B](#) for detailed information about the five agencies.

Responsiveness

Of the 210 cases we reviewed, 143 requests were submitted directly to Government Relations¹ and 67 to other Postal Service departments. Government Relations did not consistently respond within their internal goal of 10 business days.

Specifically:

- Government Relations personnel took more than 10 business days to respond to 25 requests (17 percent), ranging from 1 to 41 business days late² from the date the request was assigned to the date of the response (see Figure 1).³

Figure 1. Late Responses

[Hover mouse below to see the Number of Late Responses per business days late.](#)

Source: U.S. Postal Service Office of Inspector General (OIG) analysis of late responses.

- Procedural discrepancies contributed to the delays and we did not find any evidence that the Postal Service intended to be nonresponsive. Government Relations' SOP did not address when to start the clock for responding to congressional requests. Government Relations' practice was to start its 10 business day clock when a request was assigned to personnel based on availability and workload.

However, Government Relations indicated requests can take longer to complete due to:

- The nature of the request
- The amount of research necessary for a complete response
- Waiting for external sources to send information
- Personnel being on leave
- Staffing shortages

¹ The mean, median, and mode response time for the 143 cases were 10, 10, and 11 business days, respectively.

² The mean, median, and mode response time for the 25 late cases were 20, 14, and 12 business days, respectively.

³ Additionally, we found 24 cases where the system erroneously calculated 11 business days as the due date instead of 10 business days. Government Relations personnel stated the system error was corrected on December 23, 2013.

Three of the five federal agencies we benchmarked against had a response goal of 10 business days or more and all five agencies began counting their response time the day they received a request from Congress. To ensure requestors receive information timely and promote customer service to the public and Congress, it is vitally important that Government Relations start its response time when it receives requests.

Acknowledgement of Receipt

Government Relations did not consistently acknowledge receipt of requests by date stamping incoming correspondence, documenting the date of request for all email correspondence, or notifying the requestor that the request was received. Of the 143 requests received by Government Relations, 64 (45 percent) were in the form of letters, 47 (33 percent) were facsimile transmissions, and 14 (10 percent) were email requests. We could not determine the format of the remaining 18 requests.

Of the 143 requests, 49 (34 percent) either had no date stamp (22) or an illegible date stamp (27) recording the receipt date. For the remaining 94 requests, Government Relations did not account for the time between the date the request was received and the date it was assigned to an analyst, which ranged from 1 to 27 days.⁴ In addition, it did not document the date of request for all requests including emails. Government Relations personnel stated some date stamps were illegible because they used red and blue ink, which did not show up well on scanned copies. While we recognize that not every form of correspondence needs to be documented, it is important to track essential elements, such as the date when a request is received.

Government Relations' protocol required an interim acknowledgment of receipt letter for high-profile inquiries requiring more than 10 business days to research, prepare, and finalize; however, of the 143 cases reviewed, we found only one case where Government Relations notified the requestor when it received such a request. Two of the federal agencies we benchmarked against were required to date stamp correspondence or record the receipt date in their tracking system on the day of receipt and two sent an acknowledgement of receipt email within 48 hours of receiving the request.

Notification of Delays

Government Relations did not advise requestors of any time delays since its policy did not require this notification. However, Government Relations should send an interim response to the requestor if it knows that a delay is likely because the case is highly complex, of a sensitive nature, needs vetting through several departments or staff availability. There were five cases where Government Relations staff did not notify requestors because they were not available due to training, inclement weather and leave. This interim response could also serve as acknowledgement that the inquiry was received.

Of the five federal agencies we benchmarked against:

- Two sent an acknowledgement if they knew the response would be delayed.
- Four requested an extension when a response would take them between 1 and 21 business days of receipt to issue.

⁴ The mean, median and mode for these 94 cases were 6, 4 and 2 business days, respectively.

Questions for the Record from Congressional Testimony

Government Relations responded timely to or requested an extension for all 12 QFRs the Postal Service received between FYs 2011 and 2014; however, the group needs formal policies and procedures for responding to QFRs. This would keep policies consistent during personnel transitions, something that is particularly important in this office, which has had high turnover in recent years. In addition, there was no official requirement to document requests for time extensions, but Government Relations made requests through email or telephone. Two of the five federal agencies we benchmarked against published their procedures and times for responding to QFRs in a formal correspondence handbook.

According to Government Relations, other Postal Service organizations assign employees with responding to QFRs guidance on when and how to provide information to Government Relations. However, this guidance is not published and responders may be unaware of QFR response requirements.

Clear standards and a centralized process for promptly responding to and handling requests could enhance Government Relations' ability to effectively respond to Congress and other stakeholders. In addition, a formal handbook outlining expectations for all employees that is enforceable at every level could help the Postal Service meet performance goals and hold Government Relations accountable for deadlines and deliverables.

Requests from Individual Members of Congress

Postal Service policy gives priority to committees and subcommittees with oversight authority and does not prioritize requests from individual members of Congress. Instead, such requests are treated as if they were submitted under FOIA.⁵ This policy does not recognize individual Congress members' need for information to carry out their legislative duties.

Government Relations stated that it responds to every committee or subcommittee request it receives and responses vary, depending on the nature of the request. In addition, it would respond to appropriate requests on a case-by-case basis. Government Relations cited Department of Justice (DOJ) guidance on FOIA requests to support treating requests from individual members as ordinary FOIA requests.⁶ Even DOJ guidance, however, recommends that agencies "should of course give very careful consideration to any access request received from a Member of Congress, with discretionary disclosure often a possibility[.]" and should have "particular regard for the considerations of congressional relations."⁷

FOIA also specifically stipulates that its guidelines are no basis for withholding information from Congress⁸ and that agencies should take relations into consideration before deciding not to disclose information. The guidance also notes that such disclosures, if handled carefully, should not create a risk of waiving otherwise valid FOIA exemptions.⁹

Recognizing that federal information needs to be shared to enhance transparency and positive relations between Congress and the Postal Service, Government Relations should carefully consider any access requests received from a member of Congress and be open to discretionary disclosure.

⁵ Handbook AS-353, *Guide to Privacy, the Freedom of Information Act, and Records Management*, Section 5-3, page 59.

⁶ See [Department of Justice Office of Information Policy](#), *FOIA Update: OIP Guidance: Congressional Access Under FOIA*, Vol. V, No. 1 (Jan. 1, 1984).

⁷ *Id.* at 11, 13.

⁸ 5 U.S.C. §552(d).

⁹ See *id.* at 11.

Recommendations

We recommend management develop and publish internal and external policies to include, but not limited to, starting response periods when requests are received, establishing response due dates, date stamping incoming correspondence, documenting the date of request for all incoming email requests, sending notifications when requests are received or responses will be delayed, and responding to QFRs.

We recommend the deputy postmaster general and chief government relations officer:

1. Develop and publish internal and external policies and procedures for congressional requests and update the Correspondence Tracking System, to include, but not be limited to, starting response periods when requests are received, establishing response due dates, date stamping incoming correspondence, documenting the date of request for all incoming email requests, and sending notifications when requests are received or responses will be delayed.
2. Develop and publish internal and external formal policies and procedures and a centralized process for receiving, handling, and responding to questions for the record after congressional hearings.
3. Revise policies to designate requests from individual members of Congress as having appropriate priority to promote transparency and positive relations.

Management's Comments

Management disagreed with several statements in the report and provided clarification for others. Management agreed with all the recommendations. In their response, management emphasized that it takes its relationship with Congress and their staffs very seriously, and their responsibility to promptly respond to all congressional requests. Management disagreed with including data from 2011, a period in which the office was experiencing a staffing shortage. Management also stated that the report failed to recognize that responsiveness to congressional requests involves more than meeting the department's self-imposed productivity target. Rather, responsiveness is determined by the unique needs of each request, considering factors such as sensitivity, confidentiality, and complexity of the issues involved.

Management stated the OIG incorrectly reported that the Consumer and Industry Affairs Office and the Office of the Postmaster General are authorized to respond directly to congressional requestors within 7 business days and are not required to notify Government Relations or provide it with the requests or responses. Management also stated that the deputy postmaster general sends Questions for the Record to the responsible Executive Leadership Team members with instructions for responding, including the established response deadline.

Regarding recommendation 1, management agreed to internally and externally publish established policies and procedures for handling congressional inquiries. The target implementation date is July 31, 2016. Management also indicated changes to the Correspondence Tracking System will require investigation and analysis of cost, budget, information technology and customer issues. If resources are within reason and provide an acceptable cost/benefit analysis, changes will be developed and implemented within normal budget cycles. The target implementation date for changes to the Correspondence Tracking System is January 31, 2017.

Regarding recommendation 2, management agreed to publish their policies and procedures for handling questions for the record internally and externally. Management explained although not published, Government Relations has policies and procedures it follows, and a centralized process for receiving, handling, and responding to questions for the record received after congressional hearings. The target implementation date is April 30, 2016.

Regarding recommendation 3, management stated the OIG's recommendation to give congressional requests received from individual members of Congress the same level of treatment as requests from Congressional committees acting within the scope

of their jurisdiction is inconsistent with the governing law, and makes no sense as a matter of policy. Management also stated that the report did not sufficiently recognize the importance of protecting confidential information. However, management agreed to review and update their policy regarding the treatment of requests from individual Members of Congress to clarify that Government Relations will treat individual Members as requesters under FOIA. Additionally, management indicated they will exercise discretionary disclosure of otherwise confidential information to individual Members on a case-by-case basis based on a weighing of the various issues involved. The target implementation date is July 31, 2016.

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

Evaluation of Management's Comments

The OIG considers management's comments responsive to all recommendations and the corrective actions should resolve the issues identified.

Regarding management's statement that the OIG incorrectly reported that the Consumer and Industry Affairs Office and the Office of the Postmaster General are authorized to respond directly to congressional requestors within 7 business days and are not required to notify Government Relations or provide it with the requests or responses, our finding in the report addresses non-headquarters Consumer and Industry Affairs offices' responses, which were found in Government Relations' Correspondence Tracking System. Management's concern appears to address headquarters Consumer and Industry Affairs' responses as opposed to the non-headquarters Consumer and Industry Affairs offices located at district field offices. In addition, in a July 22, 2015 email, Government Relations stated to the OIG that "many congressional offices send their inquiries directly from their own district offices to the Postal Service district with responsibility for the geographic area" and that the local district "may respond." Further, in a June 9, 2015 email, Government Relations stated to the OIG that "there is no requirement for (field managers) to (send copies of their responses to Government Relations, but) it is a courtesy (Government Relations) enjoys." This is in agreement with the Administrative Support Manual, Section 338.33, which states field managers are authorized to respond directly to governmental inquiries related to services provided to customers of their offices or geographic areas, and as stated above, we identified 67 requests where other Postal Service departments responded directly to the requestors.

Second, regarding management's clarification in the report regarding the questions for the record, the OIG is aware of the process that Government Relations has with the Executive Leadership Council members when gathering information for Questions for the Record. However, the OIG does not consider these to be formal, published policies and procedures. Management agreed to develop and publish internal and external formal policies and procedures and a centralized process for receiving, handling, and responding to questions for the record after congressional hearings.

Regarding management's disagreement regarding the prioritization of requests from individual members of Congress, we believe it is a mischaracterization to state that the OIG has recommended that requests from individual members of Congress receive "the same level of treatment as requests from Congressional committees." Rather, the OIG is recommending that, in the interest of comity and improved Congressional relations, the Postal Service assign such individual requests a greater priority in processing than general FOIA requests. This does not require that individual requests would receive the same level of responsive disclosure as would a request from a Congressional committee. Instead, it merely means that these individual requests would be treated with appropriate regard. A greater level of responsive disclosure may be encouraged, but only where appropriate in light of the Postal Service's business needs and legal responsibilities. This approach would be consistent with the DOJ's previously issued FOIA guidance, where it has noted that federal agencies "should of course give very careful consideration to any access request

received from a Member of Congress, with discretionary disclosure often a possibility[.]” and should have “particular regard for the considerations of congressional relations” when assessing such requests.¹⁰

Fourth, management stated the report failed to recognize that responsiveness to congressional requests involves far more than meeting the department’s self-imposed productivity target, and that responsiveness and timeliness are not determined by a fixed productivity target but by the unique needs of each request, considering factors such as sensitivity, confidentiality, and complexity of the issues involved. The OIG understands the concerns expressed by management, and it included FY 2011 through FY 2014 in the scope of its audit because a prior audit by the OIG concluded that opportunities existed to improve the efficiency and cost effectiveness of Government Relations operations by developing a comprehensive workload tracking and analysis system and written policies and procedures. As this prior audit report was issued in FY 2011, the OIG wished to follow-up on the timeframes just after the prior audit. In addition, as Government Relations was aware of the hiring freeze, organizational restructuring and reduction-in-force in the Postal Service, it may have opted to send additional notification of delays to requestors, informing them of possible delays.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. All 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.

10 Office of Information Policy, DOJ, “Congressional Access Under FOIA,” FOIA Update, Vol. V, No.1, paragraph 11-13 (1984).

Appendices

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Background

As of April 2015, the Postal Service’s Government Relations and Public Policy Office had 39 employees in three separate groups:

- Government relations liaisons
- Public policy planning and analysis
- Legislative policy and strategy development

The groups play a critical role in providing consistency in governmental affairs that affect the Postal Service’s interests. They are tasked with developing and executing the public policy and legislative objectives of the Postal Service. Government Relations’ personnel work with stakeholders at the federal, state, and local levels to educate them on postal issues and serve as a resource on matters that pertain to the Postal Service or its constituents.

Members of Congress usually ask the Postal Service for help on constituent matters, such as mail delivery, stamp suggestions, and employee grievances. These requests are an important way members of Congress obtain information and oversee the Postal Service. Requests that involve a letter from a member of Congress — usually a chairman or ranking member on behalf of his or her oversight committee or subcommittee — are considered “official requests.” Government Relations receives most of these inquiries; however, other Postal Service groups, such as the Consumer and Industry Affairs Office or the Office of the Postmaster General, may receive them as well.

When Government Relations receives a request, it is tracked in CTS and assigned to available Government Relations personnel. Once personnel is assigned, he or she scans a copy of the request and any appropriate information, such as the assignment date, the lawmaker or requestor’s name, and the subject matter, into CTS. Government Relations has a self-imposed deadline of 10 business days to perform the appropriate research, contact field personnel for information, and write and review an official response.

Table 2 reflects the total number of congressional letters reported in the CTS from FYs 2011 through 2014.

Table 2. Congressional Letters

Fiscal Year	Total
2011	6,339
2012	4,781
2013	3,612
2014	3,851
Total	18,583

Source: Government Relations’ CTS.

QFRs are formal questions a lawmaker provides in writing to a witness testifying at a congressional hearing to obtain additional post-hearing information. When the Postal Service receives a QFR from a committee, Government Relations will distribute it to the appropriate Postal Service Executive Leadership Team member with a response deadline. Once Government Relations receives answers to all QFRs, it will incorporate them into a single response and send it to the inquiring committee. From FYs 2011 through 2014, 12 QFRs were sent to Government Relations after 16 hearings.

Objective, Scope, and Methodology

Our objective was to assess Government Relations' management of congressional requests and inquiries. To accomplish our objective, we:

- Reviewed Government Relations' policies and procedures for receiving, handling, and responding to congressional requests.
- Interviewed Government Relations personnel, such as the executive director (acting) and the manager, Public Policy and Analysis.
- Interviewed congressional staff members about previous requests submitted to Government Relations.
- Reviewed 205 statistically selected Government Relations CTS cases, five cases based on concerns of members of Congress, and 12 QFRs for FYs 2011 through 2014.
- Contacted and/or researched five federal agencies to determine their policies and procedures for receiving, handling, and responding to congressional inquiries.

We conducted this review from March 2015 through January 2016, in accordance with the Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluation*. We discussed our observations and conclusions with management on December 4, 2015, and included their comments where appropriate.

We assessed the reliability of CTS data by reviewing the electronic records in the system and verifying them through interviews with 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
<i>Government Relations Operations</i>	FF-AR-11-014	9/23/2011	None

Report Results: Our report found that opportunities exist to improve the efficiency and cost effectiveness of Government Relations operations by developing a comprehensive workload tracking and analysis system and written policies and procedures. While the Postal Service's recent organizational redesign increased Government Relations employee-to-supervisor ratio, we were unable to determine if it was the optimal staffing level for the workload. In addition, we believe management should review Stamp Services placement in Government Relations to determine whether the current organizational placement is optimal. Furthermore, we determined the district Consumer and Industry Affairs' workload does not duplicate or supplement Government Relations case work. We recommended the Postal Service establish procedures to gather and periodically monitor workload statistics on all functions with the Office of Government Relations and Public Policy, develop written policies and procedures to guide operations within the Office of Government Relations and Public Policy, and review placement of the Stamp Service organization in the Office of Government Relations and Public Policy to determine whether it is properly aligned within the Postal Service based on Stamp Services' primary mission. Management agreed with the recommendations.

Appendix B: Agency Comparison

We benchmarked against five federal agencies' procedures on how they received and responded to congressional requests. Specifically, we inquired about response time, start of response time, response receipt acknowledgements, response time extension requests, field coordination, and QFR procedures.

Table 2. Federal Agencies' Procedures on Receiving and Responding to Congressional Requests

Agency	Response Times (in Business Days)	What Starts Clock	Date Stamp Incoming Correspondence	Acknowledgement Reply	Request for Extension	Questions for the Record
Postal Service	10 days	Specialist assigned	None required	None required; however, reply may be prepared if employee knows upfront that response will take longer than usual	None required; however, request may be prepared if employee knows upfront that response will take longer than usual	Informal, non-published procedures
Agency A	5 days	Letter received by office	Not addressed	Reply should be prepared when response cannot be made within 2 weeks of assigned date	Contact correspondence analyst for instructions for 1-5 day extension	Not addressed
Agency B	6 days for committee chairs, 14 days for other members of Congress, 30 days for simple requests	Letter received by office	Correspondence date stamped on day of receipt	Not addressed	Must be made within 1 day of receipt of assignment	Not addressed
Agency C	7 days	Letter received by office	Correspondence date recorded in tracking system on day of receipt	Agency must send acknowledgement if it cannot provide response within 21 days	Agency must send letter if it cannot provide response within 21 days	Not addressed
Agency D	21 days	Letter received by office	Not addressed	Must be acknowledged within 48 hours of receipt	Set on a case-by-case basis and coordination with the director or office personnel	Procedures and response times published in a formal correspondence handbook
Agency E	10 days	Letter received by office	Not addressed	Automatic reply sent from correspondence mailbox when request is received	Agency must send letter if it cannot provide response within 10 days	Procedures and response times published in a formal correspondence handbook

Source: OIG research and interviews with five federal agencies' congressional relations offices, April through July 20, 2015.

Appendix C: Management's Comments

RONALD A. STROMAN
DEPUTY POSTMASTER GENERAL
AND CHIEF GOVERNMENT RELATIONS OFFICER



January 27, 2016

JANET M. SORENSON
DEPUTY ASSISTANT INSPECTOR GENERAL
FOR REVENUE AND RESOURCES

SUBJECT: Draft Management Advisory Report – Government Relations Responsiveness to
Congressional Requests (Report Number HR-MA-16-DRAFT)

Thank you for the opportunity to review and comment on the Draft Management Advisory Report on the U.S. Postal Service Office of Government Relations Responsiveness to Congressional Requests. As an initial matter, Government Relations and Public Policy (Government Relations) takes very seriously its relationship with Members of Congress and their staffs, and our responsibility to promptly respond to all congressional requests. Despite the Office of Inspector General's (OIG) assertions, we believe that we have consistently demonstrated prompt attention and responsiveness to all congressional requests.

Government Relations has an outstanding track record of responding to congressional requests. We follow a well-established process to respond to congressional inquiries, and have a departmental productivity target of finalizing a response within 10 business days from the day a request is assigned to personnel. The process of researching and responding to congressional requests encompasses multiple steps, which includes at a minimum, two levels of review to ensure accuracy of content, consistency, timeliness and to ensure responses facilitate understanding of Postal Service policies and positions.

According to the OIG's findings, the mean, median, and mode for Government Relations' response time for the 143 audited cases were 10, 10 and 11 business days, respectively. Further, the mean, median, and mode for the time it took Government Relations to assign requests to personnel were 6, 4, and 2 business days, respectively. Based on the OIG's own data, Government Relations took an average of 16 business days to respond to congressional requests—average response time of 10 business days plus average time of 6 days to assign requests to personnel. The OIG benchmarked Government Relations against five federal agencies with response times ranging from 5 to 30 business days. Government Relations' total average response time of 16 business days is well within the range of benchmarked agencies, and the OIG's audit clearly demonstrates that Government Relations has consistently responded to congressional requests in a timely fashion.

Within the Draft Management Advisory, there are several statements that we believe are inaccurate or require clarification.

First, even after numerous meetings and discussions, the OIG fails to understand Government Relations' role in responding to congressional requests. It was pointed out to the OIG audit team that Administrative Support Manual 338.32 dictates that all policy matters, including but not limited to, rate making, mail classification, contracting and procurement, real estate, arbitration, interpreting collective bargaining agreements, appointments, promotions, and personnel policies are to be forwarded to Government Relations for response. Nonetheless, in its draft Management Advisory, the OIG incorrectly reports that the Consumer and Industry Affairs (C&IA) Office and the Office of the

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Postmaster General are authorized to respond directly to congressional requestors within 7 business days and are not required to notify Government Relations or provide it with the requests or responses. All congressional requests received by postal headquarters departments, including C&IA and the Office of the Postmaster General, are forwarded to Government Relations for research and development of an appropriate response. Government Relations liaison staff sign the majority of these responses; however, when a determination is made that a congressional response will be signed by the head of a functional area outside of Government Relations, including the Postmaster General, Government Relations is still responsible for logging, tracking, analyzing, researching, writing, reviewing, editing and mailing or hand delivering the signed response to the congressional requestor.

Second, the OIG report inaccurately states that "[a]ccording to Government Relations, other Postal Service organizations assign employees with responding to Questions for the Record (QFRs) guidance on when and how to provide information to Government Relations. However, this guidance is not published and responders may be unaware of QFRs response requirements." During the course of the audit, Government Relations explained to the OIG verbally and in writing that the Deputy Postmaster General sends QFRs to the responsible Executive Leadership Team (ELT) member(s) with instructions for responding, including the established response deadline. These instructions also identify the Government Relations' staff that the completed draft responses are to be sent to, and who should be contacted for assistance or guidance on preparing responses. Once completed, ELT members submit draft responses to Government Relations' staff, who compile and review the responses for accuracy and consistency with testimony and/or prior statements. Government Relations reconciles any discrepancies with the responsible ELT member prior to submission to the requesting congressional Committee.

Third, the OIG's recommendation to give congressional requests received from individual members of Congress the same level of treatment as requests from Congressional committees acting within the scope of their jurisdiction is inconsistent with the governing law, and makes no sense as a matter of policy. As an initial matter, the Postal Service's practice accords with the Executive Branch's long-standing interpretation of Freedom of Information Act (FOIA). See *Department of Justice Guide to the Freedom of Information Act, Procedural Requirements* at 18 (2013) (noting that "individual members of Congress possess the same rights of access as those guaranteed to 'any person.'" (citing FOIA Update, "Congressional Access under FOIA," Vol. V, No. 1, at 3-4 (1984)). Congress exercises its legislative power (including its authority to oversee the Executive Branch) as an institution, including through delegations of authority to committees and subcommittees. Therefore, as the Department of Justice has noted, there is a fundamental distinction between Congress as an institution (including committees and subcommittees), and individual members of Congress. This distinction is also recognized in the *Congressional Oversight Manual* published by the Congressional Research Service (CRS). See *Congressional Oversight Manual*, CRS Report No. RL30240, at 24, 55-56, 65 (2014).

The OIG's draft Management Advisory report is therefore incorrect in suggesting that the Postal Service's practice is in any way inconsistent with 5 U.S.C. § 552(d), which concerns the application of FOIA to requests from "Congress." That provision only applies to requests for information authorized by either the House or the Senate, including requests issued by a committee or subcommittee acting within the scope of its delegated jurisdiction.

These long-standing principles also reflect sound policy, by underlying a process that both effectuates Congress' institutional interests and ensures that confidential Executive Branch materials are accorded appropriate protection. In this regard, it is unfortunate that the draft Management Advisory report makes no mention whatsoever of the Postal Service's legitimate interests in protecting its confidential information. For instance, it has long been recognized that protection of privileged material, such as the information that an individual member of Congress requested, which the OIG informed postal management formed in part the basis for its self-initiated audit of Government

Relations, is necessary for sound decision-making. As another example, the Postal Service has a special need to protect its confidential commercial information, considering it operates in competitive markets; this interest is reflected in postal statute 39 U.S.C. § 410(c)(2). The Postal Service simply could not effectively fulfill its myriad statutory functions if it operated in a fishbowl, with every individual member of Congress having the ability to acquire (and potentially disseminate further) confidential Postal Service materials. Channeling requests for confidential Postal Service information through the appropriate oversight committees ensures that such requests are tailored to advance Congress's legislative and oversight agenda, and that the information is protected.

That being said, the Postal Service's current practice does not foreclose the possibility of discretionary disclosure of otherwise confidential information to individual members of Congress on a case-by-case basis, based on a weighing of the various issues involved. Indeed, the Postal Service often works with members in an attempt to accommodate their requests, including by suggesting that the member pursue the information through the proper, committee-based process. However, a policy by which the Postal Service treats every request from a member of Congress as being equivalent to a request from its oversight committees is neither appropriate nor workable.

Finally, the OIG audited 143 of 18,500 congressional requests received from fiscal years (FY) 2011 through 2014. This sample represents less than 1 percent of the total requests Government Relations and Public Policy received during this timeframe. The OIG acknowledges that we explained that responses can take longer than the self-imposed 10-day productivity target due to the nature of the request; the amount of time necessary to research the request; waiting for external sources to provide information; personnel leave; and, staffing shortages. Further, in September 2015, during the OIG's first "exit conference," Government Relations informed the OIG that the correspondence unit experienced an 80 to 100 percent vacancy rate for most of FY2011 due to a one-year hiring freeze and subsequent Organizational Restructuring and Reduction-in-Force. Although the correspondence unit was operating under extraordinary circumstances in FY2011 and unusual response times likely skewed audit results, the OIG elected to include FY2011 data in its audit, presumably to support its unfounded conclusion that "procedural discrepancies contributed to delayed responses."

The OIG's report fails to recognize that responsiveness to congressional requests involves far more than meeting the department's self-imposed productivity target. Government Relations has a responsibility to provide a timely and thorough response that has been researched and vetted through the appropriate channels. "Responsiveness and timeliness" are not determined by a fixed productivity target as implied by the OIG. Rather, they are determined by the unique needs of each request, considering factors such as sensitivity, confidentiality, and complexity of the issues involved.

Below please find our responses to the OIG's recommendations:

1. Develop and publish internal and external policies and procedures for congressional requests and update the Correspondence Tracking System, to include, but not be limited to, starting response periods when requests are received, establishing response due dates, date stamping incoming correspondence, documenting the date of requests for all incoming email requests, and sending notifications when requests are received or responses will be delayed.

Management Response/Action Plan:

Management agrees with this recommendation. Government Relations and Public Policy will review, update, and publish internally and externally its established policies and procedures for handling congressional inquiries. Changes to the Correspondence Tracking System will require investigation and analysis of cost, budget, IT and customer issues. If resources are within reason and provide an acceptable cost/benefit analysis, changes will be developed and implemented within normal budget cycles.

Target Implementation Date:

July 31, 2016, for publishing internal procedures and consideration of publishing external procedures.

January 31, 2017, for changes to correspondence tracking system.

Responsible Official:

Director, Government Relations & Public Policy

2. Develop and publish internal and external formal policies and procedures and a centralized process for receiving, handling, and responding to questions for the record after congressional hearings.

Management Response/Action Plan:

Management agrees with this recommendation. Although not published, Government Relations has policies and procedures it follows, and a centralized process for receiving, handling, and responding to questions for the record received after congressional hearings. Government Relations will review and formalize these policies and procedures in "Standard Operating Procedures" documents that will be published internally and externally.

Target Implementation Date:

April 30, 2016

Responsible Official:

Director, Government Relations & Public Policy

3. Revise policies to designate requests from individual members of Congress as having appropriate priority to promote transparency and positive relations.

Management Response/Action Plan:

Management agrees with this recommendation. Government Relations will review and update our policy regarding the treatment of requests from individual Members of Congress to clarify that we will treat individual Members as requesters under FOIA, and will exercise discretionary disclosure of otherwise confidential information to individual Members on a case-by-case basis, based on a weighing of the various issues involved.

Target Implementation Date:

July 31, 2016

Responsible Official:

Director, Government Relations & Public Policy



Ronald A. Stroman



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Contact us via our [Hotline](#) and [FOIA](#) forms, follow us on social networks, or call our Hotline at 1-888-877-7644 to report fraud, waste or abuse. Stay informed.

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