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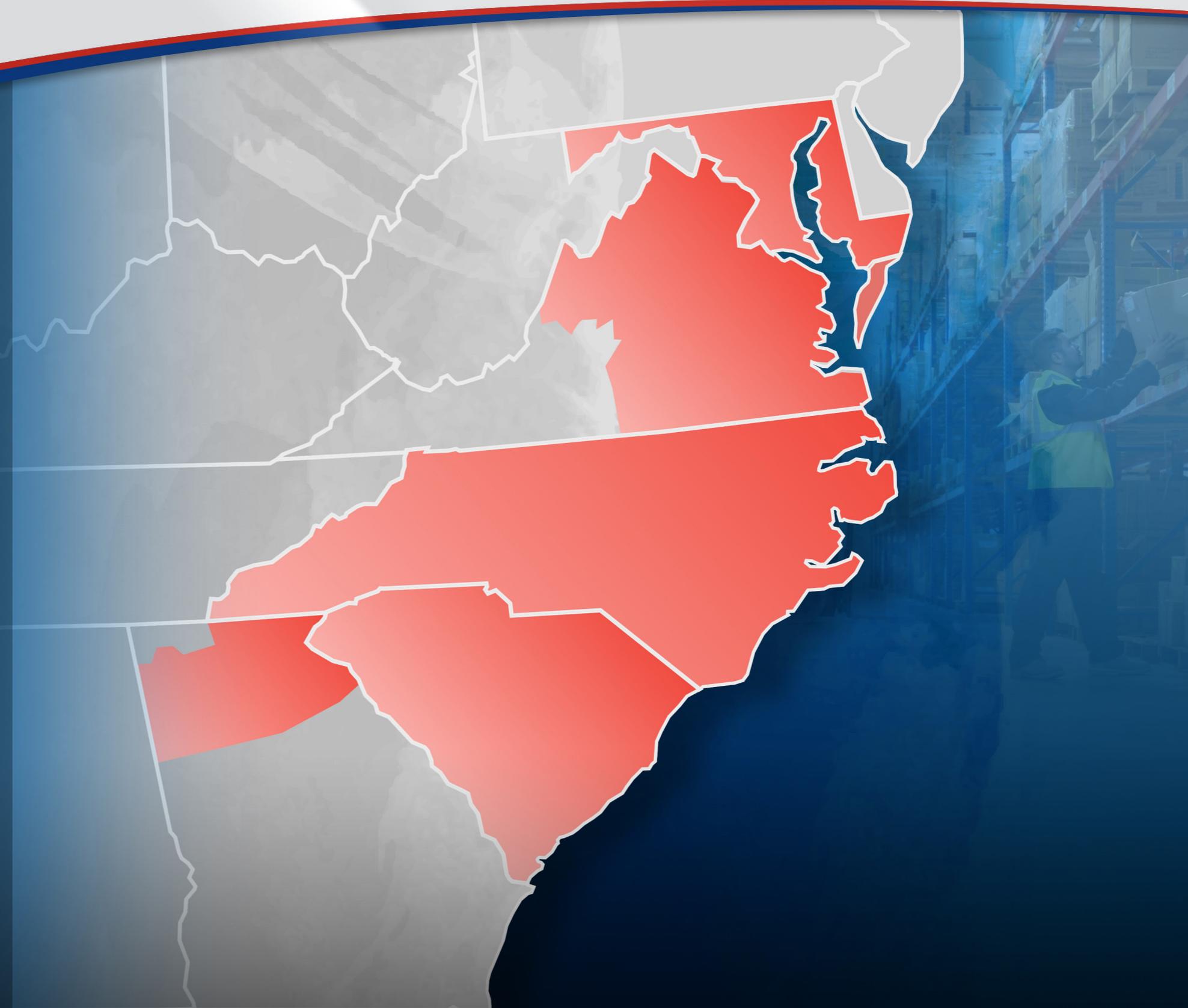
UNITED STATES POSTAL SERVICE

Union Steward Activity in the Capital Metro Area

Audit Report

Report Number
HR-AR-16-001

February 4, 2016





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Highlights

Management in the Capital Metro Area did not always ensure union steward workhour data was accurate and consistent.

Background

The U.S. Postal Service has three major unions — the American Postal Workers Union, the National Association of Letter Carriers, and the National Postal Mail Handlers Union — that represent majority of non-rural bargaining employees. Each union has a collective bargaining agreement that allows it to certify Postal Service employees as union stewards who represent other employees at their work locations.

The Postal Service must allow stewards official steward duty time during their scheduled workhours to investigate, present, and adjust grievances. Similarly, each employee has the right to participate in union activities, including seeking the representation of a steward.

When it is necessary for a steward to conduct steward duty or the employee to meet with the steward, the steward and employee must request permission from their immediate supervisor. Supervisors must complete a Postal Service (PS) Form 7020, *Authorized Absence from Workroom Floor*, when employees leave work for various reasons and retain the forms for 3 years.

The Postal Service designated 12 operation codes within the Time and Attendance Collection System to track steward duty workhours, which automatically accumulate in payroll code 070.

During fiscal year (FY) 2014, the Capital Metro Area had 10,347 employees with 184,796 steward duty workhours valued at \$4,973,301, and in FY 2015 it had 11,026 employees with 196,060 steward duty workhours valued at \$5,306,816. Our objective was to assess management of union steward workhours in the Capital Metro Area.

What The OIG Found

Management in the Capital Metro Area did not always ensure union steward workhour data was accurate and consistent. Specifically, supervisors at 11 judgmentally selected facilities in the Capital Metro Area allowed employees who were not certified stewards, to improperly charge 5,650 workhours to 12 operation codes designated only for certified stewards during FYs 2014 and 2015. These employees should have used operation codes designated for “meeting time”. In addition, Capital Metro Area supervisors did not always complete or retain PS Forms 7020 to authorize the release of stewards to conduct steward duties.

These conditions occurred because supervisors were not always aware of the correct use of the 12 union steward operation codes. In addition, supervisors were either unaware of the requirement to complete PS Form 7020 or believed it was not applicable.



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Some workhours in operation codes designated for steward duty were not accumulated in payroll code 070 due to Time and Attendance Collection System programming errors.

As a result, the union steward codes were overstated by 5,650 (15 percent) of the total 37,207 steward duty workhours at those 11 facilities for both FYs 2014 and 2015, while use of the designated operation code representing “meeting time” or other correct codes was understated. Because supervisors in the Capital Metro Area are not ensuring that employees accurately charge steward duty workhours, reported workhours are incorrect. Therefore, management could make operational decisions based on incorrect data.

We also found some workhours in operation codes designated for steward duty were not accumulated in payroll code 070 due to Time and Attendance Collection System programming errors.

These errors did not affect employees’ pay. During the course of our audit, management took action to correct this issue, which should help to ensure steward duty codes are appropriately tracked in payroll.

What The OIG Recommended

We recommended management issue guidance to supervisors and other appropriate management on the proper use of operation codes for employees involved in union-related activities. We also recommended providing supervisors training on steward duty timekeeping procedures and issuing PS Form 7020 guidance.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

February 4, 2016

MEMORANDUM FOR: KRISTIN A. SEAVER
VICE PRESIDENT, CAPITAL METRO AREA OPERATIONS

E-Signed by Janet Sorensen 
VERIFY authenticity with eSign Desktop


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

SUBJECT: Audit Report – Union Steward Activity in the Capital Metro
Area (Report Number HR-AR-16-001)

This report presents the results of our audit of union steward activity in the Capital Metro Area (Project Number 15RG028HR000).

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

Upon approving a request for steward duty time, the supervisor is required to complete a Postal Form (PS) Form 7020, Authorized Absence from Workroom Floor, authorizing employees' absence from the workroom floor.

Introduction

This report presents the results of our self-initiated audit of U.S. Postal Service union steward activity in the Capital Metro Area (Project Number 15RG028HR000). The objective of this audit was to assess the management of union steward workhours in the Capital Metro Area. See [Appendix A](#) for additional information about this audit.

The Postal Service has three major unions — the American Postal Workers Union, the National Association of Letter Carriers, and the National Postal Mail Handlers Union — that represent the majority of non-rural bargaining employees.¹ The collective bargaining agreements (CBA) between the Postal Service and the unions allow each union to certify Postal Service employees as union stewards to represent other Postal Service employees at their work locations.

The Postal Service must allow stewards to have official steward duty time, which consists of time spent during their scheduled tour investigating, presenting, and adjusting grievances. Similarly, each employee has the right to participate in union activities, including seeking the representation of a steward. When it is necessary for a steward to conduct steward duty or meet with an employee both must request permission from their immediate supervisor. Upon approving a request for steward duty time, the supervisor is required to complete a Postal Service (PS) Form 7020, Authorized Absence from Workroom Floor, authorizing employees' absence from the workroom floor.

The Postal Service uses the Time and Attendance Collection System (TACS) to collect employee time and attendance data and tracks the workhours associated with steward duty using various operation codes,² which are automatically accumulated in payroll code 070 for Steward Duty³ in TACS. Employees generally swipe an electronic badge reader to clock in on the operation code designated for the work activity being performed. During fiscal year (FY) 2014, the Capital Metro Area had 10,347 employees with 184,796 steward duty workhours valued at \$4,973,301, and in FY 2015 it had 11,026 employees with 196,060 steward duty workhours valued at \$5,306,816.

Summary

Management in the Capital Metro Area did not always ensure union steward workhour data was accurate and consistent. Specifically, at 11 judgmentally selected facilities in the Capital Metro Area, supervisors allowed employees, who were not certified stewards, to improperly charge 5,650 workhours to 12 operation codes designated only for certified stewards during FYs 2014 and 2015.⁴ These employees should have used operation codes designated for “meeting time”. In addition, Capital Metro Area supervisors did not always complete or retain PS Forms 7020 to authorize the release of stewards to conduct steward duties.

These conditions occurred because supervisors were not always aware of the correct use of the 12 union steward operation codes. In addition, supervisors were either unaware of the requirement to complete PS Form 7020 or believed it was not applicable.

As a result, the union steward codes were overstated by 5,650 (15 percent) of the total 37,207 steward duty workhours at those 11 facilities for both FYs 2014 and 2015, while use of the designated operation code representing “meeting time” or other correct

1 We excluded any steward activity conducted by rural carrier stewards represented by the National Rural Letter Carriers' Association because they have a different process for managing union steward workhours.

2 Operation codes are three-digit numbers that identify the type of work the employee performs.

3 Payroll codes are used to describe various types of workhours. For example, payroll code 070 is used to describe steward duty workhours, while 052 is for regular workhours and 053 is for overtime workhours.

4 We limited our testing to determining whether employees who charged steward duty workhours were actually certified stewards.

Management allowed employees, who were not certified stewards, to charge workhours to certified union steward codes rather than appropriate codes for meeting time.

codes was understated. Because supervisors in the Capital Metro Area are not ensuring that employees accurately charge steward duty work hours, reported work hours are incorrect. Therefore, management could make operational decisions based on incorrect data.

We also found some workhours in operation codes designated for steward duty were not accumulated in payroll code 070 due to TACS programming errors. These errors did not affect employees' pay. During the course of our audit, management took action to correct this issue, which should help to ensure steward duty codes are appropriately tracked in payroll.

Certified Union Steward Data Integrity

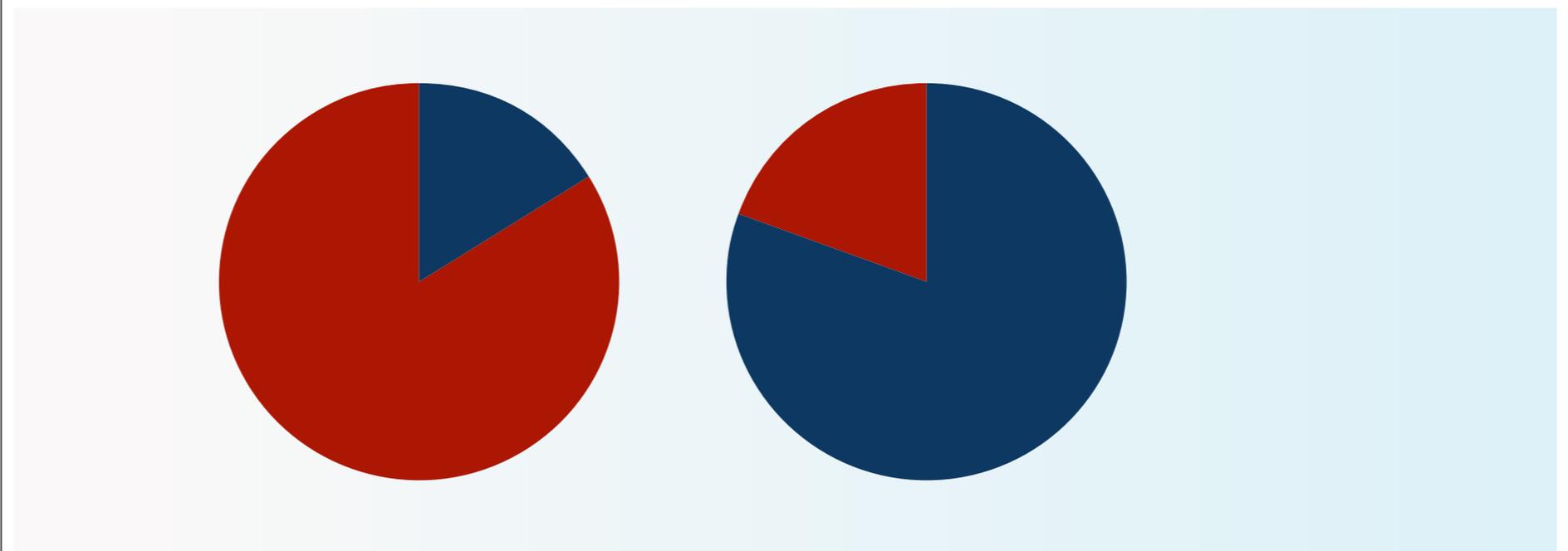
Capital Metro Area management did not always ensure the accuracy and consistency of certified union steward data to facilitate effective and responsive decisions affecting operations. In addition, Capital Metro Area supervisors did not properly authorize union steward absences from the Postal Service workroom floor or maintain appropriate supporting documentation for accountability of steward duty time.

Steward Operation Codes

Management allowed employees, who were not certified stewards, to charge workhours to certified union steward codes rather than appropriate codes for meeting time. Specifically at 11 judgmentally selected facilities in the Capital Metro Area, supervisors allowed employees, who were not certified stewards, to improperly charge 5,650 workhours to 12 operation codes designated only for certified stewards during FYs 2014 and 2015. Of the 571 employees in FY 2014 who charged 23,556 workhours to the certified union steward operation codes at the 11 facilities:

- 478 (84 percent) were not stewards, and charged 4,569 (19 percent) of the workhours.
- Only 93 (16 percent) were certified stewards (see Figure 1).

Figure 1. FY 2014 Steward Duty at 11 Facilities



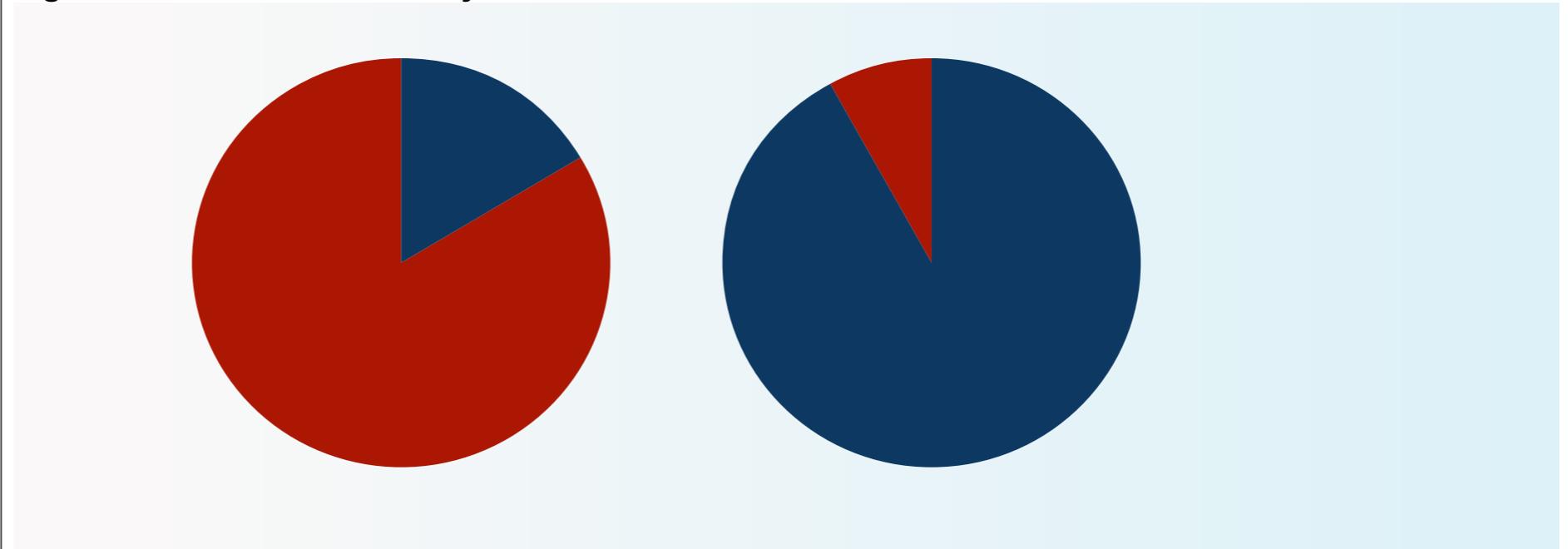
Of the 578 employees that charged 13,651 steward duty workhours at the 11 facilities during FY 2015, 482 (83 percent) were not stewards.

Supervisors were not always aware of the correct use of the 12 union steward operation codes.

In addition, of the 578 employees that charged 13,651 steward duty workhours at the 11 facilities during FY 2015:

- 482 (83 percent) were not stewards, and charged 1,081 (8 percent) of the workhours.
- Only 96 (17 percent) were certified stewards (see Figure 2).

Figure 2. FY 2015 Steward Duty at 11 Facilities



According to Postal Service policy, steward duty operation codes include “non-supervisor workhours of certified union stewards during their scheduled tour for investigating, presenting, and adjusting grievances as authorized by the applicable collective bargaining agreement.”⁵ In addition, policy indicated that hours employees who are not stewards spend on grievances should be charged to operation codes designated for meeting time.⁶ The Postal Service designated operation codes for meeting time, including “workhours of employees attending meetings, conferences, hearings, and so forth, when such time is authorized by the official in charge of the installation.”⁷ Union officials indicated that employees should use meeting time operation codes for potential grievance discussions and other labor-related meetings.

Supervisors were not always aware of the correct use of the 12 union steward operation codes. Of the 29 supervisors interviewed, only two (7 percent) ensured employees used operation codes designated for “meeting time.” Twenty-five (86 percent) supervisors indicated that, to their knowledge, employees who are not stewards should use the steward operation codes to track time spent consulting with or being interviewed by a steward or receiving a pre-disciplinary interview.⁸ The remaining two (7 percent) supervisors indicated they did not know why non-steward employees used the steward operation codes. Although some supervisors and facility managers believed they were required to record all union-related activities in the operation codes designated for steward duty, the applicable bargaining agreements have no such requirement.

⁵ Postal Service Handbook M-32, *Management Operating Data System*, Section A-2, page 238, dated March 2009.

⁶ Handbook F-21, *Time and Attendance*, Exhibit 251.22, page 106, dated August 2009.

⁷ Handbook M-32, Section A-2, page 241, dated March 2009.

⁸ A pre-disciplinary interview is an investigatory interview conducted by the supervisor that must take place prior to issuance of any disciplinary action.

Based on our analysis of data for the Capital Metro Area, we concluded all 380,856 steward duty workhours charged in FYs 2014 and 2015 valued at \$10,280,117 were at risk of inaccurate reporting.

Of the 29 supervisors interviewed, we found only three (10 percent) who completed PS Forms 7020, which document the accountability of employees who leave the workroom floor.

Based on our analysis of data for the Capital Metro Area, we concluded all 380,856 steward duty workhours charged in FYs 2014 and 2015 valued at \$10,280,117 were at risk of inaccurate reporting. In addition, the union steward codes were overstated by 5,650 (15 percent) of the total 37,207 steward duty workhours at those 11 facilities for FYs 2014 and 2015, while use of the designated operation codes representing “meeting time” or other correct codes was understated.

Absence from Workroom Floor

Of the 29 supervisors interviewed,⁹ we found only three (10 percent) who completed PS Forms 7020, which document the accountability of employees who leave the workroom floor. Two of the three supervisors also signed documentation presented by the stewards in addition to completing a PS Form 7020. Eighteen (62 percent) supervisors only documented their approval by signing the steward’s documentation. In eight (28 percent) cases, the supervisor did not use anything to authorize the release of stewards. Those supervisors simply approved steward duty requests verbally and, in some cases, it was understood the steward would receive a predetermined number of hours to conduct steward activities.

The documentation ranged from forms created by the local union branches to handwritten requests presented by the steward on paper. Some of the forms simply requested steward time and provided an estimated amount of time needed while other forms showed 2 hours of preprinted steward time they anticipated to investigate any grievance. Further, 11 of the 29 (38 percent) supervisors did not retain documentation supporting their approval process.

Table 1 reflects the supervisors’ method of releasing stewards to conduct steward duty and their document retention record.

Table 1. Steward Duty Supporting Documentation at 11 Sites Visited

Type of Documentation	Number of Supervisors	
	Completed	Retained
PS Form 7020	1	0
PS Form 7020 and Other Documentation	2	2
Other Documentation	18	16
No Documentation	8	0
Total	29	18

According to the supervisors, they were either unaware of the requirement to complete a PS Form 7020 or believed it was not applicable. For example, some supervisors indicated they had used PS Forms 7020 in the past but did not believe the form was still required. Some supervisors at the smaller retail and delivery facilities indicated they believed PS Forms 7020 were only required at the larger processing plants. The Postal Service provides formal training to supervisors regarding time and attendance matters; however, the training does not directly address steward duty time.

Each CBA we reviewed¹⁰ required stewards to request permission from their immediate supervisor to leave the work area to conduct steward duty. Postal Service policy¹¹ requires supervisors to complete a separate PS Form 7020 for each instance of

⁹ We interviewed 29 supervisors at 11 facilities in six districts throughout the Capital Metro Area.
¹⁰ We reviewed the national CBAs between the Postal Service and the APWU, NALC, and the NPMHU.
¹¹ Handbook F-21, *Time and Attendance*, Section 252.3, page 109, dated August 2009.

Failure to properly complete a PS Form 7020 could further weaken the integrity and accountability of data representing steward duty time.

approved steward duty time. Supervisors must check the box on the form indicating steward duty time and note the time steward duty begins and ends. Managers must retain the forms for 3 years.

The Postal Service policy allowing both stewards and non-stewards to charge the job operation codes designated for tracking certified union steward duty workhours adversely affects the accuracy, reliability, and integrity of the reporting process and sound decision-making. In addition, a properly completed PS Form 7020 provides employees with an excused absence from the workroom floor and supervisors with a consistent method of controlling the accountability of all employees. Failure to properly complete a PS Form 7020 could further weaken the integrity and accountability of data representing steward duty time.

Other Matters

We found data inconsistencies during our analysis of Capital Metro Area steward duty workhours. Specifically, when comparing workhour data by operation code to workhour data by payroll code, we found that some workhours in operation codes designated for steward duty had not been included in payroll code 070.

Two employee designation-activity codes (834 and 844)¹² and two employee operation codes (528 and 609)¹³ in TACS were not programmed to allow the automatic accumulation of workhours associated with those codes in payroll code 070. Although TACS steward duty workhours charged to payroll code 070 do not affect employees' pay, the hours charged to steward duty operation codes are required to be coded to the payroll code according to a senior payroll accountant.

Inconsistency in steward duty payroll coding negatively impacts the ability to appropriately track steward duty codes in payroll and further compromises data completeness and accuracy. During the course of our audit, the headquarters payroll accounting team coordinated with information technology personnel to develop a remedy, which management implemented on September 2, 2015, to ensure all steward duty workhours would be properly coded going forward. As a result, we are not making a recommendation on this issue at this time.

¹² A designation-activity code is a 3-digit number that identifies various categories of employees such as full-time, part-time, and flexible, as well as the base functional activity of the employee. Designation-activity codes 834 and 844 represent transitional employee carriers and city carrier assistants, respectively.

¹³ Operation codes 528 and 609 were designated for steward duty workhours. [See Table 2.](#)

Recommendations

We recommend management issue guidance to supervisors and other appropriate management on the proper use of operation codes for employees involved in union-related activities and provide training.

We recommend the vice president, Capital Metro Area Operations:

1. Issue guidance to supervisors and other appropriate management on the proper use of operation codes for employees involved in union-related activities.
2. Train supervisors on steward duty timekeeping procedures and issue guidance to supervisors on the requirement for completing Postal Service Form 7020 to approve steward duty time.

Management's Comments

Management agreed with the finding and recommendation 1 and partially agreed to recommendation 2. Management disagreed with our calculation that all 380,856 steward duty workhours charged in FYs 2014 and 2015 were at risk of inaccurate reporting. Management stated that the inconsistencies in operation code usage found in the 11 sites reviewed do not necessarily place all steward duty workhours charged in the Capital Metro Area at risk of inaccurate reporting.

Regarding recommendation 1, management stated they will implement this recommendation by issuing guidance to all managers and supervisors on the proper operational codes for union-related or other administrative activities. They will issue this guidance in the form of a letter from the area vice president that will be disseminated by February 16, 2016.

Regarding recommendation 2, management stated they will implement a portion of this recommendation. Management indicated they will issue guidance in the form of a letter to all managers and supervisors reiterating the requirement to complete a PS Form 7020 to approve steward duty. Management indicated they will issue this guidance by February 16, 2016. Management did not state they would provide supervisors with training regarding steward duty timekeeping procedures. In subsequent correspondence, management stated they will escalate this issue to headquarters for further review and future training course development because availability of formal steward duty timekeeping training is a national issue.

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

Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendations and corrective actions should resolve the issues identified in the report. Although Capital Metro Area management does not plan to provide training mentioned in recommendation 2, the guidance management plans to issue should sufficiently reinforce the responsibilities to complete a PS Form 7020 when approving steward duty.

We acknowledge that improper use of operation codes for employees involved in union-related activities might not have occurred at all Capital Metro Area facilities, or might have occurred to varying extents. However, based on our analyses of the overall number of employees charging steward duty at facilities in the Capital Metro Area and the number of steward versus non-steward employees who charged to the activity code at the 11 sites reviewed, there is a risk of inaccurate reporting due to non-steward employees charging steward duty operation codes throughout the area.

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.

Appendices

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Appendix A: Additional Information

Currently, there are 12 operation codes in TACS that have been designated for steward duties, based on the steward employee title.

Background

Currently, there are 12 operation codes in TACS that have been designated for steward duties, based on the steward employee title. All steward duty workhours are accumulated in payroll code 070 (see Table 2). The Capital Metro Area's 10,347 employees located at 621 facilities charged time in one or more of the 12 operation codes, which totaled 184,796 workhours during FY 2014.¹⁴

Table 2. Operation Code and Description

Operation Number	Description
528	Steward Duty
607	Stewards-Clerks-Mail Processing (MP)
608	Stewards-Clerks-Customer Service (CS)
609	Stewards-Function 7 (CS Support-Administrative and Clerical)
610	Stewards-Clerks-Finance
611	Stewards-Clerks-Human Resources
612	Stewards-Mail Handler-MP
613	Stewards-Carriers
615	Stewards-Vehicle Maintenance Facility
616	Stewards-Maintenance
617	Stewards-Motor Vehicle Services
626	Steward Duty-Postal Police Officer

Steward duty time is generally tracked in the Postal Service's TACS, which is designed to provide supervisors and managers with actual workhour data, including steward time, to monitor labor hours and costs at the local level. They track workhours associated with each activity in TACS using the various operation codes. Employees generally swipe on an electronic badge reader to clock in on an operation code designated for the work activity being performed.

The Postal Service has three major unions that represent the majority of non-rural bargaining employees – the APWU, NALC, and NPMHU. Each Postal Service employee has the right to participate in union activities, including seeking the representation of a steward. Article 17 of each CBA between the Postal Service and the four major unions outlines the same basic rights for stewards. The unions may certify Postal Service employees as union stewards authorized to represent other Postal Service employees at their work locations; however, neither Postal Service Headquarters nor Capital Metro Area management maintains a consolidated list of certified stewards.

The Postal Service must allow stewards official steward duty time. Steward time is the time certified union stewards spend during their scheduled tour investigating, presenting, and adjusting grievances. When a steward must leave his or her work area to investigate and adjust grievances or to investigate a specific problem to determine whether to file a grievance, the steward

¹⁴ FY 2014 beginning October 1, 2013 and ending September 30, 2014.

must request permission from the immediate supervisor. Supervisors must not unreasonably deny such requests and must also authorize employees to attend grievance meetings with stewards.

Upon approving a request for steward duty time, the supervisor is required to complete a PS Form 7020, authorizing the steward's absence from the workroom floor. On the form, the supervisor must note the time at which the steward begins steward duty and the return time. Supervisors are required to keep PS Forms 7020 on file for 3 years.

Objective, Scope, and Methodology

Our objective was to assess the management of union steward workhours in the Capital Metro Area. Our scope covered union steward workhours Capital Metro Area employees represented by the APWU, NALC, or NPMHU used during FYs 2014 and 2015. Steward workhours include all workhours charged to each of the 12 operation numbers designated for steward duties.

To accomplish our objective, we:

- Reviewed relevant policy documentation, including CBAs, interpretation manuals, and Postal Service handbooks.
- Analyzed TACS workhour data by operation code to identify all FY 2014 steward workhours and the employees who charged those workhours.
- Judgmentally selected 11 Capital Metro Area facilities based on facility type and number of steward workhours charged at that site. We selected the facilities from a variety of facility types, including processing and distribution centers, network distribution centers, delivery and distribution, and post offices. We conducted site visits at each of the selected facilities, which covered six of the total eight Capital Metro districts and:
 - Interviewed facility managers and supervisors responsible for approving steward duty time.
 - Obtained and reviewed relevant documentation.
 - Identified the certified stewards assigned to each facility and compared the names to the list of employees who charged steward duty workhours during FY 2014.
- Interviewed headquarters officials, district managers, facility managers, Human Resources managers, and labor relations managers, as appropriate.
- Interviewed union officials.

We conducted this performance audit from May through February 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on December 21, 2015, and included their comments where appropriate.

We assessed the reliability of TACS data by performing electronic testing of required data elements. Specifically, we compared the workhours in sample operation code records to the workhours in corresponding payroll code records. We also compared a sample of TACS records to corresponding clock ring records from the TACS Everything Report. In addition, we interviewed payroll accounting officials knowledgeable about TACS data. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

The OIG did not identify any prior audits or reviews related to the objective of this audit.

Appendix B: Management's Comments

AREA VICE PRESIDENT
CAPITAL METRO AREA OPERATIONS



January 11, 2016

Lori Lau Dillard
Director Audit Operations
Office of Inspector General
United States Postal Service

Subject: Response to OIG Audit Report – Union Steward Activity in the Capital Metro Area Report Number HR-AR-16-DRAFT

Thank you for the opportunity to respond to the OIG Audit of Union Steward Activity in the Capital Metro Area.

The Capital Metro Area does generally agree with the recommendations made in this audit. We agree that the Standard Operating Procedures (SOP) pertaining to the release of Union representatives to perform Union related activities needs to be reviewed, updated and redistributed to the field. Moreover, we agree that a review of the appropriate operational numbers for steward release and/or employee absence from the workroom floor for grievance or other administrative meetings and activities should be conducted and absences from the workroom floor attributed to grievance processing and/or other administrative meetings should be documented on a PS Form 7020, *Authorized Absence from Workroom Floor*.

Regarding Monetary Impacts - Data Integrity, the Capital Metro Area does not agree with the OIG audit findings that all 380,856 steward duty work hours charged in FY14 and 15, valued at \$10,280,117, were at risk of inaccurate reporting. While there were instances articulated in the audit within the eleven (11) judgmentally selected sites where an employee meeting with a Union steward or attending other administrative meetings was shown to be on the incorrect operation (on a steward duty time operation instead of being on a meeting time operation), the inconsistencies found in the 11 selected sites are reflective of reporting in those sites and do not necessarily place all hours charged to steward duty time in the remaining facilities within the jurisdiction of the Capital Metro Area at risk of inaccurate reporting.

OIG Recommendation #1

We recommend the Capital Metro Area Operations Vice-President issue guidance to supervisors and other appropriate management officials on the proper use of operation codes for employees involved in union-related activities.

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Management Response/ Action Plan

The Capital Metro Area will implement this recommendation. The Capital Metro Area will issue guidance to all managers and supervisors in Capital Metro Area on the proper operational codes for employees to use when engaged in union-related or other administrative activities. This guidance will be in the form of a letter from the Area Vice-President that will be disseminated to field operations.

Target Implementation Date

February 16, 2016

Responsible Officials

Skip Stinson, Area Manager Accounting
Jeff Conway, Area Manager Labor Relations
Dave Mills, Area Manager Human Resources

OIG Recommendation #2

We recommend the Vice-President Capital Metro Area Operations train supervisors on steward duty timekeeping procedures and issue guidance to supervisors on the requirement for completing PS Form 7020 to approve steward duty time.

Management Response/ Action Plan

The Capital Metro Area will implement a portion of this recommendation. The Capital Metro Area office will issue guidance to supervisors and managers on the use of the PS Form 7020 to approve steward duty or other administrative activities that would require an employee to be absent from the workroom floor. This guidance will be issued in the form of a letter from the Area Vice-President, for dissemination to all managers and supervisors, that reiterates the requirement for employees to complete a PS Form 7020 when absent from the workroom floor and for the retention of the documents.

Target Implementation Date

February 16, 2016

Responsible Officials

Skip Stinson, Area Manager Accounting
Jeff Conway, Area Manager Labor Relations
Dave Mills, Area Manager Human Resources


Kristin Seaver

cc: Sally Haring – OIG
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