



Office of Inspector General | United States Postal Service

Audit Report

A Broader Perspective for the Postal Service Ethics Program

Report Number FT-AR-19-001 | November 6, 2018



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Highlights

Objective

The objective was to assess the maturity of the U.S. Postal Service Ethics Program in three areas: (1) agency goals and metrics, (2) accountability and consistency, and (3) cause and prevention. We discuss these areas using a maturity model framework to demonstrate the value of approaching an organization's ethical efforts in a comprehensive, integrated manner that actively contributes to the organization's mission.

The Ethics in Government Act of 1978 (Ethics Act) established the U.S. Office of Government Ethics (OGE) which oversees and determines compliance with the executive branch ethics program, the mission of which is to prevent conflicts of interest on the part of executive branch employees. In its latest review, the OGE identified two issues related to the Postal Service's annual ethics training. Both have been resolved.

The ethics branch of the Postal Service Ethics and Compliance Office (Ethics Office) is responsible for overseeing compliance with the Ethics Act. The overall mission of the Ethics Office is to familiarize all Postal Service employees with the ethics laws and regulations that apply to employees of the executive branch. The chief ethics and compliance officer describes the Postal Service Ethics Program in terms of compliance with the requirements of the Ethics Act, ensuring the Postal Service is applying the standards of conduct, and advising the managers of individuals involved in misconduct.

For this audit, the U.S. Postal Service Office of Inspector General (OIG) did not evaluate whether the Postal Service complied with Ethics Act requirements as mandated by the OGE. Rather, the OIG took a broader perspective of ethics programs. In our approach, an ethics program reaches beyond the mission of the Ethics Office and encompasses the organization's and employees' ethics-related obligations that are external to the Ethics Act.

This broader program engages groups across the organization in active coordination and communication to facilitate accountability and foster organizational consistency while generating reliable metrics for analysis and decision making. We included analysis of the benefits of tracking unethical

activities that affect the public trust, involve dishonesty, and/or the appearance that laws have been violated.

We employed maturity models to provide a framework for assessing the state of the program and developing improvement plans to achieve the desired levels of maturity. Maturity models are models of organizational improvement that are built on the premise that organizations involved in complex endeavors move through levels of effectiveness. As organizations become more experienced in those endeavors and develop effective systems supporting the activities, they become more mature in their approach.

We designed the maturity models for the Postal Service environment by leveraging guidance from respected audit and compliance and ethics program sources. Within our models, maturity levels range from Level 1: Non-existent (low maturity); Level 2: Reactive; Level 3: Defined; Level 4: Mature; to Level 5: World Class (high maturity). The center of our scale is Level 3: Defined. At this level of maturity, an organization has defined formal policies and codes of conduct and ethics that are promulgated to all employees.

What the OIG Found

Based on our analysis of Postal Service processes in place for three areas of the ethics program during calendar year 2017, the Postal Service demonstrated maturity between Level 3: Defined, and Level 4: Mature, with some indicators of Level 5: World Class attributes for the agency's goals and metrics and accountability and consistency areas. For example:

- **Agency goals and metrics** – The Ethics Office incorporates into its annual goals specific performance targets for the number of ethics training events and is using technology to improve efficiency. However, they could better assess training effectiveness and expand maturity in this area by performing more in depth metric analysis of trends in Ethics Helpline request topics following ethics training.
- **Accountability and consistency** – The Postal Service has written policies and directives establishing employee responsibility and accountability, a written policy of non-retaliation, and a process for responding to allegations.

In addition, there are organization-wide communications describing the nature and consequences of ethics violations and unethical activity. However, maturity in this area could be enhanced by establishing organization-wide guidance outlining a common process for determining the appropriate actions in similar cases.

We also determined that the Ethics Program does not focus specifically on the cause and prevention area. A focus on cause and prevention identifies the root causes of unethical conduct and uses the information to prevent further lapses. Each organization independently determines the ethics program areas that best reflect and support their organization's mission, as well as the desired maturity for each area.

A more mature ethics program prioritizes ethics in concert with operations and better leverages data and resources to support the organization's performance measures and goals. The Ethics Program and, in turn, the Postal Service, could be enhanced by developing a more comprehensive, integrated program where ethics-related work in various groups across the organization is well-coordinated and leveraged to better support the organization's mission.

Further, an integrated, comprehensive ethics program could help the Postal Service reduce employee misconduct and unethical activity, protect its brand, and maintain its reputation as a trusted entity.

What the OIG Recommended

We recommended management:

- Establish a cross-functional committee to create and provide oversight for an organization-wide, integrated approach to the Postal Service Ethics Program.
- Adopt an approach for assessing the effectiveness of the ethics program by:
 - Identifying priority areas.
 - Designing the goals for each ethics program priority area to support the mission and organization-wide goals.
 - Identifying the desired maturity level for each ethics program priority area.
- Devise metrics, collect necessary data, expand analyses, and connect related metrics in each ethics program priority area to monitor progress toward the target maturity level and the goals of the organization's ethics program.

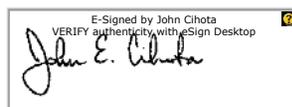
Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

November 6, 2018

MEMORANDUM FOR: THOMAS J. MARSHALL
GENERAL COUNSEL AND EXECUTIVE VICE PRESIDENT



FROM: John E. Cihota
Deputy Assistant Inspector General
for Finance and Pricing

SUBJECT: Audit Report – A Broader Perspective for the Postal Service
Ethics Program (Report Number FT-AR-19-001)

This report presents the results of our audit of A Broader Perspective for the U.S. Postal Service Ethics Program (Project Number 18BG007FT000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Lorie Nelson, Director, Finance, or me at 703-248-2100.

Attachment

cc: Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the maturity of the U.S. Postal Service Ethics Program (Project Number 18BG007FT000). Our objective was to assess the maturity of the Ethics Program relative to three areas: (1) agency goals and metrics, (2) accountability and consistency, and (3) cause and prevention. We discuss these areas using a maturity model framework to demonstrate the value of approaching an organization's ethical efforts in a comprehensive, integrated manner that actively contributes to the organization's mission. See [Appendix A](#) for additional information about this audit.

The Ethics in Government Act of 1978¹ (Ethics Act) established the U.S. Office of Government Ethics (OGE), which oversees the executive branch ethics program. The OGE periodically reviews agency ethics programs to identify and report on the strengths and vulnerabilities of the program by evaluating (1) agency compliance with ethics requirements and (2) ethics-related systems, processes, and procedures for administering the program. In its latest review of the Postal Service Ethics Program, the OGE reported two issues related to annual ethics training.² Within six months, the Postal Service had provided all related information to the OGE and the issues were resolved.

The ethics branch of the Postal Service Ethics and Compliance Office (Ethics Office) is responsible for overseeing compliance with the Ethics Act. The overall mission of the Ethics Office is to familiarize all Postal Service employees with the ethics laws and regulations that apply to employees of the executive branch. The chief ethics and compliance officer describes the Postal Service Ethics Program in terms of compliance with the requirements of the Ethics Act. He also stated that it is the responsibility of the program to ensure the Postal Service is applying the Standards of Ethical Conduct for Employees of the Executive Branch³ and advise the managers of individuals involved in misconduct.

¹ 5 U.S.C.

² Following a comprehensive review, the OGE recommended that the Postal Service (1) include estimates of the number of employees expected to receive training in further annual training plans, and (2) ensure annual ethics training includes complete reviews of the Principles of Ethical Conduct and the conflict of interest statutes. U.S. Office of Government Ethics, *Ethics Program Review, United States Postal Service, Report No 15-57*, September 2015.

³ 5 C.F.R §2635.

⁴ To distinguish between the uses of the term 'ethics program,' throughout this report, we use 'ethics program' in lower case to designate the comprehensive perspective and the term 'Ethics Program' capitalized when referring to the Postal Service Ethics Program.

⁵ Certain high-level employees are subject to this code as part of the Postal Service's obligations under the Sarbanes-Oxley Act of 2002.

“A more comprehensive perspective of ethics programs encompasses the organization’s and employees’ ethics-related obligations that are external to the Ethics Act.”

For this audit, the U.S. Postal Service Office of Inspector General (OIG) did not determine whether the Postal Service complied with the requirements mandated by the OGE under the authority of the Ethics Act. We took a more comprehensive perspective of ethics programs for this audit. In this approach, an ethics program reaches beyond the mission of the Ethics Office and encompasses the organization's and employees' ethics-related obligations that are external to the Ethics Act. This broader program engages groups across the organization — from Ethics and Compliance, Human Resources, Labor Relations, Operations, and local management — in active coordination and communication to facilitate accountability and foster organizational consistency while generating reliable metrics for analysis and decision making.

Under this comprehensive approach, the scope of the ethics program⁴ includes the organization's and employees' obligations and limits on activities from related requirements such as:

- The Senior Financial Managers' Code of Ethics.⁵
- The Hatch Act (5 U.S.C. 7321).
- Rules of Conduct for Postal Service Governors (39 C.F.R. Part 10).
- Rules of Conduct for Postal Employees (39 C.F.R. Part 447).

To a limited extent, the Postal Service Ethics Office reflects this approach in that it already provides guidance and facilitates training on the limits of employees' political activity under the Hatch Act, and advises senior financial managers when a real or apparent conflict of interest under the Senior Financial Managers' Code of Ethics is identified.

Finally, the OIG considered the potential benefits of tracking and analyzing unethical activity attributed to the Postal Service or its employees within the context of a more comprehensive, integrated ethics program. Unethical activities, as discussed in this report, include actions that affect the public trust, involve dishonesty, and/or create the appearance that laws have been violated.

Background

The Postal Service Ethics Program is grounded in three documents:

(1) Standards of Ethical Conduct for Employees of the Executive Branch, (2) 14 General Ethics Principles,⁶ and (3) Supplemental Standards of Ethical Conduct for Employees of the United States Postal Service⁷ (Supplemental Standards). In addition to periodic OGE program reviews, the Postal Service is required to submit annual reports (that is, the *Annual Agency Ethics Program Questionnaire*) to the OGE.

The Ethics Office manages financial disclosure reporting, responds to requests for guidance on ethics-related matters, designs and conducts training sessions for headquarters staff, and completes the annual report to OGE. The Postal Service chief ethics and compliance officer manages the five-member Ethics team. All new employees participate in an initial ethics orientation as part of the on-boarding process, and specialized ethics training is provided to Human Resources officials, procurement officials, supervisors, and administrative assistants.

Maturity models provide a systematic structure for measuring the 'as is' state of a process (like an ethics program). Within a model, each level of maturity also identifies the actions necessary to improve the process. Generally, maturity models employ a scale to indicate a range of maturity levels. Alone, a maturity model is neutral as to the 'desired' level of maturity. An example of the framework

for an ethics program maturity model is provided in Figure 1. Each organization independently determines their target level of maturity in each priority area of the ethics program based on their mission, priorities, and resources. Ethics programs have a multitude of areas warranting attention. The senior leaders of an organization identify both the areas that best reflect and support their organization's mission, as well as the desired maturity for each area. These subject areas are given priority and warrant management's focus in monitoring the success of the ethics program. The target maturity level is not expected to be the same across every area of an organization's ethics program.

Figure 1. Example Framework of Ethics Program Maturity Model

Organization's Priority Areas	Levels of Maturity				
	Level 1	Level 2	Level 3	Level 4	Level 5
Priority 1: Specific Ethics Program Goals (for example)					
Priority 2: Ethics Training (for example)					
Priority 3: Tone and Conduct at Senior Levels (for example)					
Priority 4: Integrity of data used for decision-making (for example)					

Source: OIG formulation of sample model.

We developed maturity models for each of the three areas of the Ethics Program based on guidance from seven respected audit and compliance and ethics program sources, and incorporated aspects relevant to the Postal Service. In our analysis of the Postal Service program, we used five maturity levels: Level 1: Non-existent (low maturity); Level 2: Reactive; Level 3: Defined; Level 4: Mature; and Level 5: World Class (high maturity). The center of our scale is Level 3: Defined. At this level of maturity, an organization has defined formal policies that

⁶ 5 C.F.R. §2635.101.

⁷ 5 C.F.R. §7001.

substantiate the program area as an area deserving and gaining management’s attention. The organization’s codes of conduct and ethics policies are defined and promulgated to all employees. Any program requirements imposed externally on the organization (such as the Ethics Act) are incorporated as attributes or goals at this level of maturity.⁸

Finding #1: Maturity of Selected Areas of the Ethics Program

Based on our analysis of Postal Service processes in place for three areas of the Ethics Program during calendar year 2017, the Postal Service demonstrated maturity between Level 3: Defined, and Level 4: Mature, with indicators of Level 5: World Class maturity in two areas. The third area was not an area of focus for the Postal Service. We noted that the organization maintains records of ethics activity through the Ethics Office and Human Resources functions, and performs some data analysis on the information collected. The Ethics Program and, in turn, the Postal Service, could be enhanced by developing a more comprehensive, integrated ethics program where ethics-related work in various groups across the organization is well-coordinated and leveraged to better support the organization’s mission. This would entail collecting more data, expanding analyses, and connecting metrics to the Postal Service’s performance and mission goals. In addition, the Postal Service would benefit from expanding its attention to manage and monitor additional areas of the Ethics Program. We provide examples and figures throughout the report to demonstrate how the Postal Service could use enhanced analytics and maturity models to better assess the Ethics Program. The information in the examples and figures is illustrative and not meant to imply specific actions the Postal Service should take. Later in this report, we illustrate how metrics on theft, destruction, and delay of mail could be utilized to correct employee behavior and improve performance measures for delivering First-Class Mail.

⁸ See [Appendix A](#) for more information on the maturity models used.

“The Postal Service demonstrated maturity between the Defined and Mature levels, with some indicators of World Class maturity in two areas.”

Agency Goals and Metrics

In this area, we asked “How is success of the Postal Service Ethics Program measured?” Specifically, this area focuses on the goals defined by the Postal Service, how Ethics Program plans are implemented to accomplish those goals, and whether key metrics are in place to monitor program effectiveness.

The Postal Service’s stated goals for its Ethics Program include educating as many employees as possible and preventing ethics violations. To accomplish these goals, the Ethics Office develops and administers ethics training, reviews and certifies financial disclosure reports, and operates an Ethics Helpline. Among other responsibilities, the Ethics Helpline responds to questions or concerns involving the Standards of Ethical Conduct for Employees of the Executive Branch.

Our review of Postal Service practices indicated the maturity of this area is between Level 3: Defined, and Level 4: Mature, with partial indicators of Level 5: World Class attributes, as depicted in Figure 2.

Figure 2. Maturity of Agency Goals and Metrics Area



Source: OIG analysis.

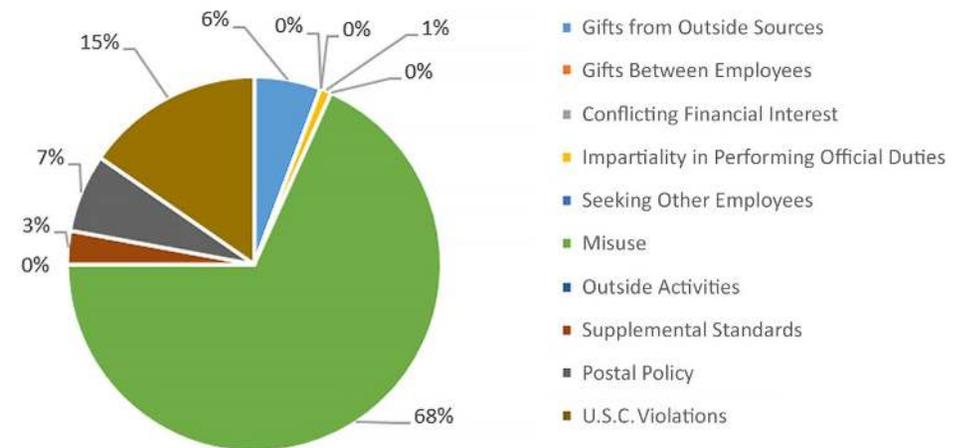
Some examples which support this maturity rating were:

- Formal adoption of the Standards of Ethical Conduct for Employees of the Executive Branch and incorporation of Supplemental Standards (Level 3: Defined).
- Defined goals for select areas that are communicated from the chief ethics and compliance officer through the attorneys and ethics specialists staffed within the Ethics Office (Level 3: Defined).
- Limited metrics calculated using OIG Reports of Investigation (ROI)⁹ to identify the types of the ethics violations committed (Level 3: Defined).
- Specific performance targets integrated into the annual Ethics Office goals — including measuring timeliness for responding to Ethics Helpline requests and reviewing financial disclosure reports — and targets for the amount of training the staff develop and administer (Level 4: Mature).
- Processes allow employees to confidentially report or seek guidance on potential or actual wrongdoing via the Ethics Office Helpline or the OIG Hotline (Level 4: Mature).
- Positive support to all levels of the organization through “Smart Business Moments” available on the intranet to provide regular communications on why employees should follow ethical rules and how doing so serves the Postal Service’s business interests (Level 4: Mature).
- Use of emerging technologies such as the Financial Disclosure System (FDS) to improve efficiencies. The FDS interfaces with other online directories to identify and alert employees who are required to file, notifies reviewers and certifiers, and collects and stores financial disclosure reports (Level 5: World Class).

The Ethics Office currently aggregates ethics violations reported in ROIs by the type of activity.¹⁰ Should the Postal Service target greater maturity in this area, the data collected could be used to provide insight into increasing ethics violations or unethical activity or periods with higher occurrence of ethics violations or unethical activity.

For example, Figures 3, 4, and 5 depict information on ethics violations and unethical activity. Figure 3 represents Ethics Office analysis where each type of violation is presented as a percentage of the total number of ethics violations for fiscal year (FY) 2016.

Figure 3. Postal Service Analysis of Ethics Violations in FY 2016
Ethical Violations Found



Source: Postal Service Ethics Office.¹¹

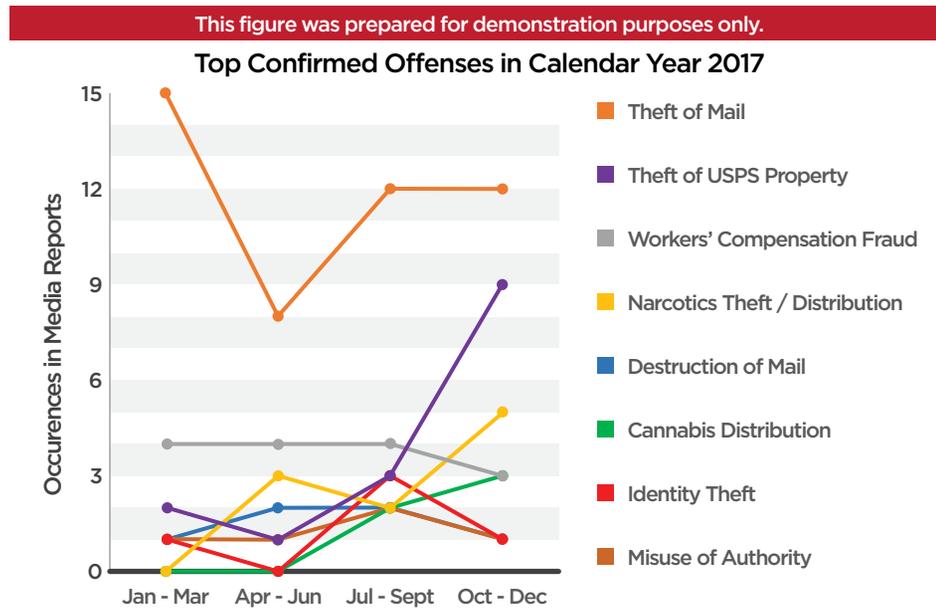
⁹ The OIG Office of Investigations presents its investigative findings for criminal, civil or administrative consideration in ROIs. The Ethics Office receives ROIs from OIG headquarters and from OIG agents in the field.

¹⁰ The Ethics Office uses U.S.C. and/or C.F.R. references to categorize specific types of violations such as gifts from outside sources, bribery, and misuse of public office, time, and government property.

¹¹ The Postal Service figure did not include the legend entry for the 15 percent segment of the pie chart. This 15 percent segment represents “U.S.C. Violations” and was added to the legend by the OIG.

In comparison, Figure 4 and Figure 5 provide more detailed information of unethical activity through the year (in this case, calendar year 2017).¹² Specifically, Figure 4 presents the frequency of the most common types of unethical activity for each quarter of the year. By monitoring trends in the types of ethics violations and unethical activity occurring, management would be better able to identify topics in need of process controls or training and act to prevent or limit further ethics violations and unethical activity.

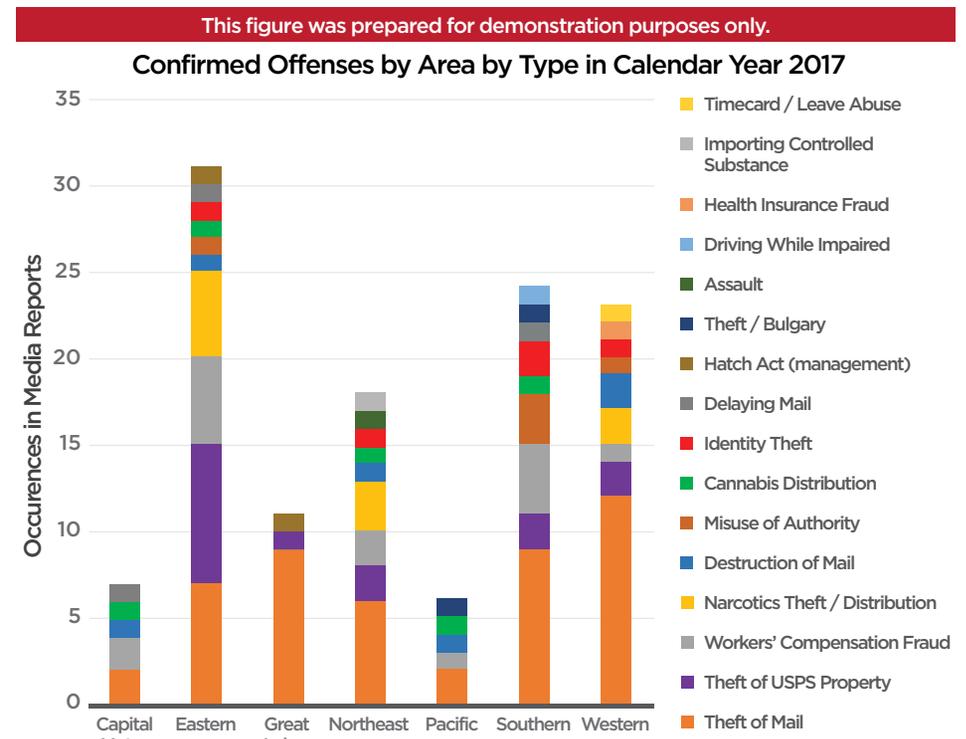
Figure 4. OIG Analysis of Unethical Activity Trending Through 2017



Source: OIG analysis based on data from media reports.

Figure 5 provides information on the types of unethical activities occurring in each Postal Service area. By monitoring ethics violations and unethical activity in each area, management would be better able to identify the types of measures successfully limiting such activity in some areas and employ them in the areas experiencing greater numbers of ethics violations or unethical activity.

Figure 5. OIG Analysis of Unethical Activity by Area and Type in 2017



Source: OIG analysis based on data from media reports.

Performing additional metric analyses requires greater reliance on data. To support the value of metrics on the Ethics Program, management may find it useful to perform an internal study of Ethics Helpline data to determine the quality, appropriateness, and consistency of the information and advice provided to requestors. After ensuring reliable Ethics Helpline data, analytic work could be expanded to enhance the maturity of this area with the following metrics:

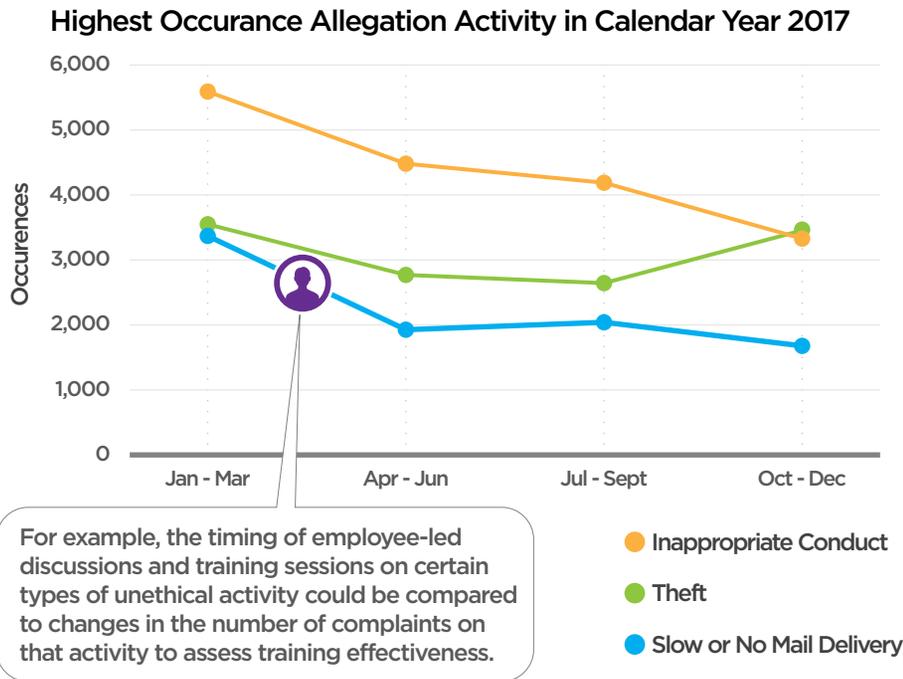
- Trending the volume of Ethics Helpline requests by topic per period to identify changes which could provide insight into topics needing additional training or communications.

¹² We used media reports of unethical activity attributed to the Postal Service or its employees during calendar year 2017 to prepare the OIG graphs and figures used in this report. “Confirmed offenses” include activities reported as admissions of guilt, convictions, and sentencing. “Offenses” include those confirmed plus activities reported as allegations, arrests, indictments, charges made, and lawsuits. Note that two types of offenses – “Destruction of mail” and “Misuse of authority” - had the same activity from Jul-Sept to Oct-Dec. As a result, the final segment of the blue line for “Destruction of mail” is obscured in the chart above. The OIG visual depictions are for demonstration purposes only. While the data behind this information is representative of actual unethical activity at the Postal Service, it is not intended that the reader use the graphs or figures to take specific action in any Postal Service area or on any employee.

- Collecting certain demographic information, such as area or district assigned, job code, or shift worked to expand analysis to identify trends and gather additional information about conditions throughout the organization to pinpoint locations where supplemental training may be needed.
- Comparing volume changes in specific Ethics Helpline request topics against recent ethics training curriculum to evaluate the effectiveness of the training, as depicted in Figure 6.

Figure 6. Monitoring the Impact of Targeted Training on the Volume of Related Ethics Helpline Requests

This figure was prepared for demonstration purposes only.



Source: OIG analysis of hotline data for the Postal Service.

A recent study¹³ of ethics and compliance training reported that organizations with more mature ethics training programs tend to use an average of three

to five different approaches to measure training effectiveness. The study concluded that reliance on training completion rates is falling while more accurate methods including pre- and post-training quizzes, changes in behavior, and business results are on the rise. Measuring training effectiveness is important to the Ethics Office given that one of their stated goals is to educate as many employees as possible.

The Ethics Office could employ Ethics Helpline data (data it already collects) to perform more in-depth assessments of the Ethics Program. Not only would expanding metrics provide actionable steps for improving or advancing the maturity of specific program areas, it would also provide the Ethics Office with a more precise view on the effectiveness of their training efforts, thereby advancing their stated goal to prevent ethics violations.

Accountability and Consistency

In this area, we asked “How effective is the Postal Service Ethics Program in addressing allegations and misconduct, holding the decision-makers accountable, and reacting in a consistent manner?”

Our review of Postal Service practices in this area indicated the maturity level is also between Level 3: Defined and Level 4: Mature, with some indicators of Level 5: World Class, as depicted in Figure 7.

Figure 7. Maturity of Accountability and Consistency Area



Source: OIG analysis.

¹³ 2017 *Ethics and Compliance Training Benchmark Report*, NAVEX Global, February 2018. NAVEX Global is made up of four governance, risk, and compliance industry leaders. They provide compliance program management support to 95 Fortune 100 companies. The 2017 report analyzes responses from over 900 ethics and compliance professionals from over 20 industries.

Some examples which support this maturity rating were:

- Written policy for non-retaliation¹⁴ against individuals who raise ethics concerns (Level 3: Defined).
- Written procedures outlining the agency's response to allegations across a wide range of misconduct (Level 3: Defined).
- Employee responsibility and accountability is defined in writing and communicated to all employees (Level 3: Defined).
- A formal investigation protocol outlines resources to use, documentation requirements, and closing investigations (Level 4: Mature).
- The U.S. Postal Service Board of Governors has processes in place to regularly review ethics-related matters via the Accounting and Finance Committee and the Governance, Regulatory and Strategic Planning Committee (Level 4: Mature).
- Organization-wide notification of the nature and consequences of ethics violations and unethical activities while protecting employee privacy (Level 5: World Class).

An organization's response to alleged ethics violations or unethical activity may lead to some form of disciplinary action. Within the Postal Service, determining the appropriate disciplinary action is decentralized. Field employees receive disciplinary action from field level Human Resources, while Human Resources

Headquarters (HQ) determines disciplinary actions for executives, officers, and HQ employees. Human Resources HQ considers several factors when deciding disciplinary action for employees. These factors include the nature and seriousness of the offense, the individual's past disciplinary record, and any other mitigating circumstances. Human Resources HQ and field offices could improve the consistency of the Postal Service's response to similar types of violations and activities by establishing a common process for determining the appropriate actions in similar cases. In fact, the OGE identified one federal department's development of an internal resource outlining guidance, standard procedures, and instructions for their decentralized ethics program as a model practice.¹⁵ This practice could serve as an example for the Postal Service ethics program.

Human Resources HQ maintains records¹⁶ of allegations and the disciplinary actions taken against HQ employees for ethical misconduct. These allegations are tracked through resolution, disciplinary action, employee retirement, or resignation. While Human Resources HQ tracks key information, an indicator of a more mature ethics program is the use of metrics to monitor performance. For example, Human Resources (HQ or in the field) could quantify the time between the date the activity is reported to them and when disciplinary action is communicated to the employee.

We expanded our analysis of Human Resource HQ records to compare the timelines for different types of employees.¹⁷ As depicted in [Figure 8](#), managerial and administrative employees had the most instances and the widest range in timeliness.

¹⁴ *Employee and Labor Relations Manual*, Section 666 Employee Relations, Prohibited Personnel Practices, September 2017.

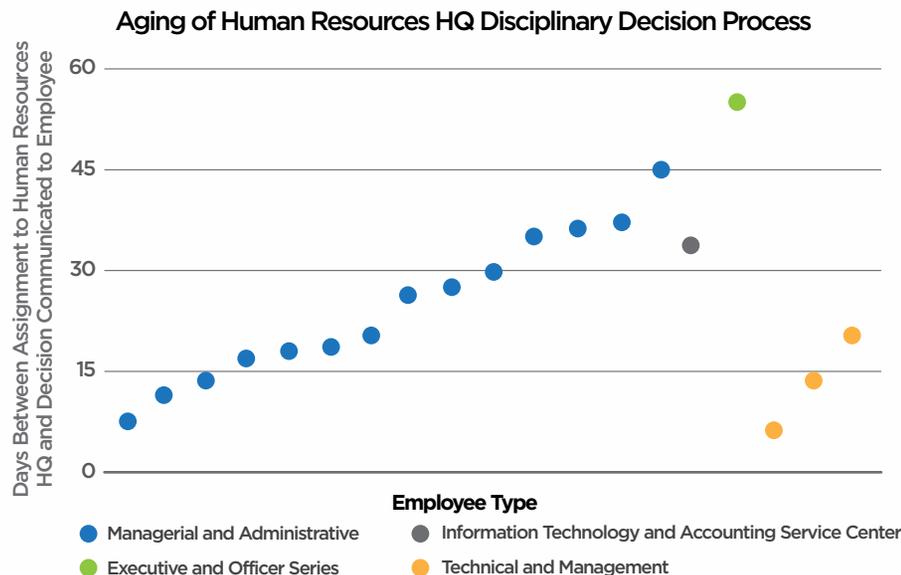
¹⁵ OGE, *Ethics Program Review*, U.S. Department of Health and Human Services, Office of the Secretary (Report No. 17-10, dated January 2017).

¹⁶ Records include the allegation, status, key disciplinary process dates, employee's business unit, and manager responsible for signing the letter of decision.

¹⁷ Human Resources HQ records of completed cases where the activity was categorized as improper conduct, misconduct, and/or unsatisfactory conduct.

Figure 8. Monitoring Processing Time of Human Resources HQ Disciplinary Actions for Misconduct

This figure was prepared for demonstration purposes only.



Source: OIG analysis of Human Resources HQ tracking of disciplinary actions in 2017.

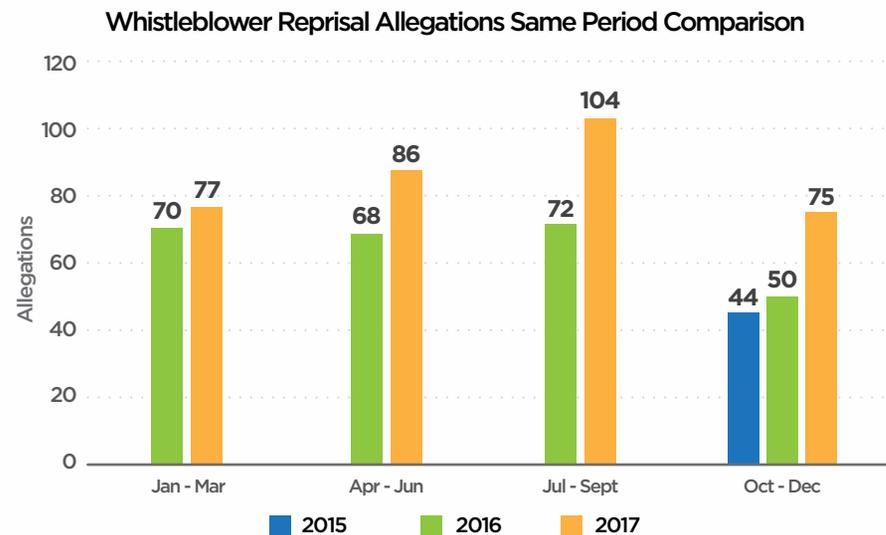
Another indicator of a more mature ethics program in the accountability and consistency areas is demonstrated when the organization considers possible manager accountability for misconduct. Human Resources HQ could analyze data across the organization to track the frequency of ethical misconduct to determine the likelihood that certain managers are maintaining environments that tolerate or enable misconduct.

Federal law and Postal Service policy protect individuals who report misconduct (whistleblowers) from retaliation. Management could extend data gathering and metric analysis techniques to analyze retaliation allegations. For example, monitoring retaliation claims across Postal Service areas and districts or over an extended period could provide the Postal Service with insight on the effectiveness of its non-retaliation policies. As depicted in Figure 9, there has been a consistent

increase in retaliation claims in same period comparisons from October 2015 through December 2017.

Figure 9. Monitoring of Retaliation Allegations Across Periods

This figure was prepared for demonstration purposes only.



Source: OIG analysis of hotline data for the Postal Service.

Monitoring and improving the maturity of the accountability and consistency area would improve information on supplemental causes of misconduct (for example, a manager who tolerates misconduct), identify patterns and trends in existing disciplinary actions, and improve awareness of developing issues. Accountability and consistency is one of the most frequently discussed areas of ethics program practices and can directly impact employee morale and an organization's reputation.

Cause and Prevention

Our goal for this area was to answer the question, "How effective is the ethics program at identifying the cause of ethical misconduct and using the information to prevent further misconduct?"

Determining the root cause of misconduct involves identifying:

- Missed opportunities to prevent or detect misconduct.
- Absent or failing controls.
- Resources that were used to support or fund the activity.

For example, did the local manager of a location with recurring ethics violations or unethical activity demonstrate a lack of oversight? Defined as such, this assessment is distinctively different from the ‘who did what, when’ analysis that is customarily conducted as part of an investigation that determines legal or disciplinary action (as documented in ROIs).

Our review of Postal Service practices determined that the Ethics Program does not focus specifically on the cause and prevention area. For example, we did not identify any written procedures or practices which incorporated root cause analysis as part of the organization’s response to ethical misconduct. If the Postal Service decided that cause and prevention was a priority area of its Ethics Program, a maturity model approach could provide the framework for envisioning the desired state and developing the plan to achieve it.

For example, organizations where ethics officials and senior management discuss the ethical implications of business practices before making decisions demonstrates maturity in this area. We noted a 2017 report¹⁸ that suggests Postal Service ethics officials and senior management did not review the implications of coordinating approved union leave without pay to carriers for political activity organized through unions. After many years of the practice, the Postal Service was advised that its efforts in this area demonstrated bias in favor of the union’s endorsed political candidates. While intended to engender goodwill in its working relationship with unions, this practice ultimately subjected the Postal Service to congressional inquiry, external reviews, and critical press coverage. In effect, its good intentions had evolved into a violation of public trust – the first standard of ethical conduct for executive branch employees. A maturity

model approach could have been useful in identifying practices where the ethics implications needed to be periodically revisited before the practice was repeated.

While insufficient to constitute attention to this area, we identified additional practices within the Postal Service that could provide the basis for developing the cause and prevention area into a priority area. Examples of practices we noted are:

- In responding to requests by contracting officers, the Ethics Office reviews Highway Contract Route contracts for conflicts of interest issues. This is a practice that suggests a Level 2: Reactive level of maturity.
- One of the Level 4: Mature indicators is ongoing monitoring of employee expenses. The Postal Service has ongoing fraud monitoring of vehicle fuel credit card activity through a U.S. Bank system which assigns red flags to high-risk transactions for additional supervisory review. This process may disclose fraud or misconduct by employees as well as detecting cloned credit cards and other activity perpetrated by non-employees.
- The Postal Service conducts an employee survey known as the “Postal Pulse.” While such surveys can be used to identify sources of pressure to compromise ethics or how well-prepared managers feel to handle ethical situations, the Postal Service does not include these types of questions in its employee survey. The use of employee surveys to gather ethics-related data would indicate that the area is operating at a Level 4: Mature level.

Root cause analysis is not unfamiliar to the Postal Service. The 2015-2020 Human Resources Plan “*Building the Workforce of the Future*” identifies root cause analysis as part of a key initiative to provide meaningful data to support decision making at the area, district, and national levels. By more closely analyzing ROIs and Human Resources records of similar types of ethics violations and unethical activity across the organization, the Postal Service could better assess the root cause of ethical misconduct to better identify more effective corrective actions to prevent further misconduct.

¹⁸ U.S. Office of Special Counsel (OSC), *Report of Hatch Act Investigation: Facilitating Labor Union’s Political Activity Through Use of “Union Official” Leave Without Pay* (OSC File No. JHA-17-0610 U.S. Postal Service, dated July 14, 2017).

An Illustration of Integrated Ethics in Support of the Postal Service Mission

A more mature ethics program prioritizes ethics in concert with operations and leverages data and resources to identify ethical issues, enabling an organization to identify and resolve issues prior to costly compliance and ethics failures. Costs incurred due to employee misconduct such as damages, settlements, and fines can be easily identified. However, less direct costs, like employee turnover, lost productivity, and reputational harm, are often harder to identify in organizations with less mature ethics programs. This section of the report demonstrates how a more mature ethics program can support the Postal Service's performance measures, goals, and overall mission.

“A more mature ethics program prioritizes ethics in concert with operations and leverages data and resources to identify ethical issues.”

The Postal Service's basic function as defined under Title 39 U.S.C. is the obligation to provide Postal Services to bind the nation together and provide prompt, reliable, and efficient services to patrons in all areas.¹⁹ The Postal Service's current *Five-Year Strategic Plan*²⁰ outlines its overall goals and objectives aligned with national performance assessment goals and objectives. The Postal Service established several Future Ready²¹ goals to realize its vision to continuously transform in response to rapidly changing technologies and to prioritize the customer experience.

The first Future Ready Goal is to deliver a world-class customer experience that includes focusing on enhancing scanning accuracy and disciplines to reduce late mail delivery. The delivery plan for First-Class Mail²² demonstrates the

close association between ethics and the Postal Service's performance goals. The Postal Service has established service standards (timeliness goals) for delivering First-Class Mail through various activities, including mail processing, and delivery.²³ Service failures can hinder prompt, reliable, and efficient mail service. A service failure occurs, for example, when mail is not processed timely and, therefore, not delivered on time. A delay during morning processing at a post office could result in a late start to a carrier's delivery route, decreasing the likelihood the carrier will meet the delivery deadline (service standard).

The delivery plan for First-Class Mail demonstrates specific instances where situations outside of a carrier's control could result in an ethical dilemma. Making the right decision can be more difficult in high-stress situations when there is pressure to meet delivery deadlines and performance measures. One of the standards of ethical conduct for executive branch employees is to put forth an honest effort in the performance of duties. A mail carrier could be tempted to destroy or delay mail or prematurely scan mailpieces as delivered to improve her performance. The wrong decision not only negatively impacts customers' mail experiences but also could constitute unethical activity that would require management and other resources to resolve.

By collecting and tracking metrics in a more comprehensive, integrated ethics program, the Postal Service can provide managers the ability to identify areas or districts where unethical activity may be adversely affecting service standards.

If tracked and reported, management could use metrics on the theft, destruction, and delay of mail (see [Figure 10](#)) to concentrate efforts to identify the root cause, hold those responsible accountable, and reduce the frequency of these types of activities to improve performance measures for delivering First-Class Mail. By improving performance measures, the organization progresses toward achieving Future Ready goals and embodying the Postal Service's mission statement.

¹⁹ 39 U.S.C. §101 – Postal policy (a).

²⁰ U.S. Postal Service *Five-Year Strategic Plan, Future Ready, Fiscal Years 2017 to 2021*.

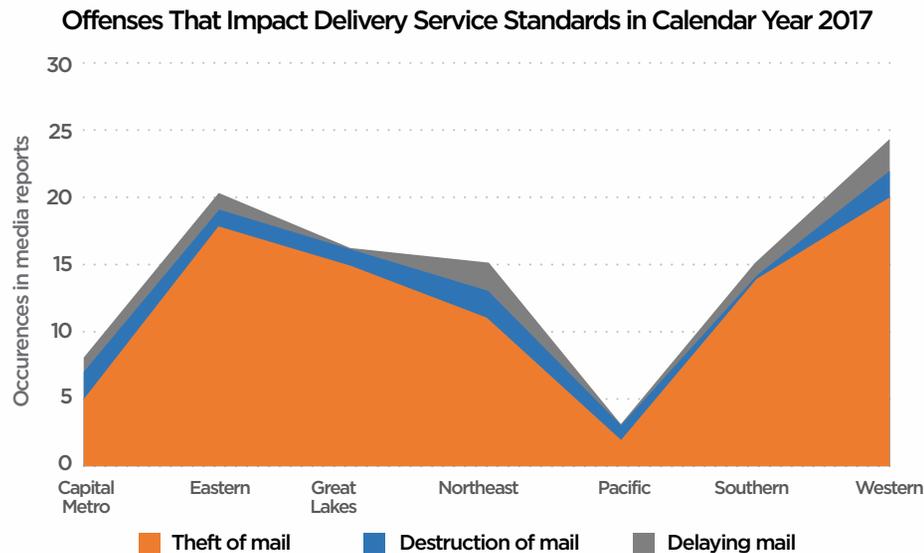
²¹ Future Ready is the Postal Service's phrase for its efforts to not merely adapt to ever-changing customer needs, but to anticipate, prepare for, and implement solutions as a leader in the industry.

²² *First-Class Mail Service Performance Measurements in the Northeast Area* (Report Number NO-AR-18-006, dated May 22, 2018).

²³ Processing sorts the mail for delivery. Delivery is the delivering of mail to the final address. The First-Class Mail activities also include collection (collecting mail from all induction points, blue collection boxes, retail units, businesses, and residences) and transportation (moving mail between Postal Service facilities).

Figure 10. Unethical Activity Impacting Delivery Standards by Area

This figure was prepared for demonstration purposes only.



Source: OIG analysis based on data from media reports.

The concept of maturity models grew out of total quality management programs emphasizing continuous improvement. When appropriately designed, maturity models avoid the pass/fail assessment approach by providing a framework for envisioning the desired state and the development of improvement plans to achieve it. We based the models developed for this audit on guidance from respected audit and compliance and ethics program sources. The maturity model approach is one such way the Postal Service can analyze its current practices, perform assessments, and determine whether processes are functioning as desired or need to be updated or expanded.

In 2017, the Postal Service was the only federal agency on a list of the Top 10 most trusted companies, as well as being ranked the highest government agency in job performance and favorability. Trust is a valuable asset for any institution. Mail carriers are the face of the Postal Service in communities, so their conduct or misconduct in neighborhoods across the nation is what supports or undermines the Postal Service brand. An integrated, comprehensive ethics

program will enable the Postal Service to protect its brand and maintain its reputation as a trusted entity.

Recommendation #1

We recommend **the General Counsel and Executive Vice President, in coordination with the executive leadership team**, establish a cross-functional committee to create and provide oversight for an organization-wide, integrated approach to the Postal Service Ethics Program.

Recommendation #2

We recommend **the General Counsel and Executive Vice President** adopt an approach for assessing the effectiveness of the ethics program by:

- Identifying ethics program areas that are priorities for the organization.
- Designing the goals for each ethics program priority area to support the mission and organization-wide goals.
- Identifying the desired maturity level for each ethics program priority area.

Recommendation #3

We recommend **the General Counsel and Executive Vice President** devise metrics, collect necessary data, expand analyses, and connect related metrics in each ethics program priority area to monitor progress toward the target maturity level and the goals of the organization's ethics program.

Management's Comments

Management generally agreed with the finding and recommendations and stated that the suggestion that they consider a broader perspective has merit. While Ethics Office management does not believe they can be responsible for employee misconduct given resource limitations and the important role of other functional areas within the Postal Service, they recognized the value in taking a broader, more comprehensive and integrated approach to the Postal Service's Ethics Program. Management acknowledged that our audit was not an evaluation of compliance and added they are monitored regularly for compliance with ethics statutes and regulations.

Regarding recommendation 1, management will establish a cross-functional committee with representatives from the Law Department, Human Resources, and Operations to create and provide oversight for an organization-wide approach to the Ethics Program. The Ethics Office will frame its programs to reflect the broader importance of ethical decision making generally, including emphasizing the employee's role in protecting the reputation of the Postal Service and performing duties with integrity. The Ethics Office will also meet periodically with Human Resources, Labor Relations, and the Law Department's Employment and Labor Law Section to discuss ethics violation trends and discuss mitigation strategies. Management plans to implement these changes by January 31, 2019.

Regarding recommendation 2, the Ethics Office will work with the cross-functional team established under recommendation 1 to identify specific ethics program areas that will be a priority for the Postal Service, design goals, and identify the desired maturity level for each of those priority areas. Additionally, the Ethics Office will analyze ethics violation trends during FY 2019 and adjust training and increase messaging to address the most frequent occurrence of ethics violations. Management plans to implement this approach for assessing the effectiveness of its ethics program by March 31, 2019.

Regarding recommendation 3, while continuing to assess the effectiveness of the Ethics Program within the context of the OGE's mandatory requirements, the Law Department and the Ethics Office will devise metrics and collect necessary data to monitor progress towards the identified priorities. Specifically, management will analyze OIG Reports of Investigation to identify trends by area, design strategies to eliminate or improve the trends, deploy a survey and pre and post quizzes for live training, and analyze trends in Ethics Helpline requests. Management plans to implement these procedures by March 31, 2019.

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

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations in the report. We acknowledge limitations in staff size and department responsibilities and the Postal Service's belief that the responsibility for employee misconduct should remain with the Human Resources and Labor Relations departments. Our intent was to show that an integrated, comprehensive ethics program could help the Postal Service reduce employee misconduct and unethical activity, protect its brand, and maintain its reputation as a trusted entity. Management can determine how best to adopt an approach that best reflects its mission and goals.

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

Scope and Methodology

We selected three subject areas from a wide variety of ethics program areas that also included training and communications, tone and conduct at the top, and integrity of data used for decision making. The three ethics program areas assessed are defined as follows.

1. *Agency goals and metrics* addresses the degree to which:

- The organization has defined goals for the program.
- Plans exist and are implemented to accomplish program goals.
- Key performance indicators or metrics are in place to measure program effectiveness.
- Procedures exist for identifying individuals with specific ethics requirements, such as financial disclosure reporting or annual ethics training.
- Program activity is tracked and recorded to enable the organization to meet regular reporting requirements.

2. *Accountability and consistency* addresses the degree to which:

- Individuals, management, and the organization are held accountable for ethical misconduct.
- Individuals at all levels of the organization are held responsible and accountable, regardless of position.
- The program responds to individuals under pressure to violate the code of conduct.
- Individuals who raise ethics concerns are protected by non-retaliation policies and practices.
- The program incentivizes ethical and disincentivizes unethical decisions and actions.

- The organization's response to allegations involves an appropriate mix of Human Resources, Legal, and Compliance personnel.
- Investigations are timely and confidential.
- The consequences for similar misconduct are relatively consistently applied across the organization.

3. *Cause and prevention* addresses the degree to which the organization:

- Researches the cause(s) behind confirmed cases of ethical misconduct.
- Identifies what was missed that allowed the misconduct to occur.
- Determines how misconduct was funded (when appropriate).
- Monitors available data to identify evolving and developing types of ethical issues.
- Leverages root cause information to improve the ethics program processes, policies, or education for management and employees.
- Conducts periodic program assessments to identify areas to improve.
- Employs ongoing analytic techniques to identify early indicators of misconduct.

While we used information on Postal Service practices, the scope of this audit did not include determining whether the Postal Service complied with the requirements mandated by the OGE under the authority of the Ethics Act. Further, we did not audit the Ethics Office or the internal controls over or within the Ethics Office or the Ethics Program.

To accomplish our objective, we:

- Researched areas of ethics and compliance programs, including best practices, from across nine federal, industry, and international sources.

- Incorporated into our research the model practices identified by the OGE in its program reports and inspection reports issued between January 1, 2017, and March 31, 2018.
- Reviewed OGE's program report of the Postal Service conducted in 2015 and the related follow-up review in March 2016, as well as the Postal Service *Annual Agency Ethics Program Questionnaires* submitted to the OGE for calendar years' 2016 and 2017 activity.
- Met with OGE representatives to better understand the ethics program for executive branch agencies and their oversight role.
- Reviewed recent audit reports on ethics programs conducted by other OIGs and met with the audit teams from the Tennessee Valley Authority OIG and the National Railroad Passenger Corporation (Amtrak) OIG.
- Selected for our scope the three areas which were most frequently discussed within the sources described and which were not addressed during regular OGE program reviews.
- Devised maturity models for each of the selected areas by leveraging The Institute of Internal Auditors (IIA) maturity model for compliance and ethics programs.²⁴
- Identified attributes relevant to the Postal Service to define each maturity level within each subject area maturity model. We also identified metrics, measures, and other indicators that when found in use in the organization helped in determining Postal Service's maturity level for the subject area.
- Researched news reports of unethical activity reported in 2017 and attributed to the Postal Service or its employees. These were used to stand-in for the data available to the Ethics Office through ROIs.
- Conducted interviews and gathered information on Postal Service processes and ethics-related activity for calendar year 2017. These were assessed to determine the maturity levels for each of the three ethics program areas.

Maturity models are models of organizational improvement that are built on the premise that organizations involved in complex endeavors move through levels of effectiveness. As organizations become more experienced in those endeavors and develop effective systems supporting the activities, they become more mature in their approach.²⁵ Generally, a maturity model is designed with five levels of maturity. Management must determine their risk tolerance in each area where a model is used, and apply it to identify the desired maturity level for the subject area. In adapting the IIA's maturity model for use with the Postal Service, we employed a five-level scale. A generic version of the basic maturity level framework used in our three maturity models is provided in [Figure 11](#).

²⁴ International Professional Practices Framework Practice Guide, *Selecting, Using, and Creating Maturity Models: A Tool for Assurance and Consulting Engagements*, The IIA, July 2013.

²⁵ *Handbook of Research on E-Learning Standards and Interoperability: Frameworks and Issues*, Stephen Marshall, copyright 2011.

Figure 11. Maturity Level Framework

Low or less mature.  Highly mature.

MATURITY LEVELS				
Level 1: Non-existent	Level 2: Reactive	Level 3: Defined	Level 4: Mature	Level 5: World Class
The absence of indicators for the attributes of the subject area.	An organization's actions are ad hoc, reactionary, and inconsistent. Policy and goals for the subject area are not documented.	Written policies that formalize an organization's requirements and structure for the subject area. The relevant aspects of the executive branch ethics program requirements established by the OGE, for the subject area (for agencies required to comply).	Incorporates expectations for timeliness, appropriate resources, and the use of data analytics in the subject area.	Demonstrates multiple aspects of recognized best practices in the subject area. Incorporates more extensive use of metrics to monitor performance, and attain and sustain an optimized process.

Source: OIG adaptation of the IIA guidance to the Postal Service environment.

We conducted this performance audit from March through November 2018, 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 finding and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective. We discussed our observations and conclusions with management on September 6, 2018, and included their comments where appropriate.

We did not employ or assess the reliability of computer-generated data for the purposes of this report. The data and figures appearing in this report are for illustrative purposes only.

Prior Audit Coverage

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

Appendix B: Management's Comments

THOMAS J. MARSHALL
GENERAL COUNSEL
AND EXECUTIVE VICE PRESIDENT



October 29, 2018

MONIQUE COLTER
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Response to Draft Audit Report– A Broader Perspective for the Postal Service Ethics Program (Report Number FT-AR-18-DRAFT)

Thank you for the opportunity to review and comment on the subject of the above-referenced draft audit report prepared by the Office of Inspector General (OIG) and to allow us the opportunity to address the findings and recommendations contained therein. We really appreciate our ongoing dialogue, and the thoughtful conversation between our teams concerning this subject.

We likewise appreciate your acknowledgement that the Office of Inspector General (OIG) did not evaluate whether the Postal Service Ethics Program complied with Ethics in Government Act of 1978 (Ethics Act) and the regulations promulgated in accordance with the Ethics Act as mandated by the Office of Government Ethics (OGE). In that regard, and as you recognize, the Ethics Office is monitored regularly for its compliance with the ethics statutes and regulations by the OGE, the agency responsible for promulgating the ethics regulations, and our Ethics Office is generally well regarded. The last full audit was completed with successful results in 2015, and the Ethics Office completes a comprehensive questionnaire that assesses compliance on a yearly basis. OGE, in turn, asks clarifying questions as necessary to ensure that our Ethics Program is in full compliance with the ethics statutes and regulations.

That said, your suggestion that we consider a broader perspective based upon the premise that an ethics program can reach beyond the mission of the Ethics Office and encompass the ethics-related obligations of the Postal Service and our employees that are external to the Ethics Act has merit. While we do not believe that we can take on the responsibility for employee misconduct generally given our small staff and the important role that the Postal Service Human Resources and Labor

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Relations Departments already play in that regard, we do recognize that there could be value in taking a broader, more comprehensive, and more integrated approach to our Ethics Program in a fashion that might more actively contribute to the organization's mission. With the above-referenced limitation in mind, the Postal Service responds to the OIG's recommendations as follows:

Recommendation #1

We recommend **the General Counsel and Executive Vice President, in coordination with the executive leadership team**, establish a cross-functional committee to create and provide oversight for an organization-wide, integrated approach to the Postal Service Ethics Program.

Management's Response

Within the constraints of the above-referenced limitation, we agree with this recommendation, and will establish a cross-functional committee made up of representatives from, at a minimum, the Law Department, Human Resources, and Operations. In addition, the Ethics Office will begin immediately to frame its ethics advice and counsel and its training to reflect the broader importance of ethical decision-making generally. This will include a greater focus on postal employees' roles in protecting the reputation of the Postal Service, and the integrity of the day-to-day work they perform. The Ethics Office will place more emphasis on the concept that public service is a public trust and will strive to make clear that compliance with the ethics statutes and regulations is only one step (although an important one) in the direction of honorable service as a postal employee. In addition, the Ethics Office will meet periodically with representatives from Human Resources, Labor Relations and the Law Department's Employment and Labor Law Section to discuss ethics violation trends in each Area found in OIG reports of investigation, and to collectively design mitigation strategies in an effort to eliminate or ameliorate such trends.

Target Implementation Date: No later than January 31, 2019
Responsible Management Official: General Counsel

Recommendation #2

We recommend **the General Counsel and Executive Vice President** adopt an approach for assessing the effectiveness of the ethics program by:

- Identifying ethics programs areas that are priorities for the organization.
- Designing the goals for each ethics program priority area to support the mission and organization-wide goals.
- Identifying the desired maturity level for each ethics program priority area.

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Management's Response

We agree with this recommendation, within the confines noted above. The General Counsel is committed to maintaining a strong Ethics Program. The Ethics Office team will provide timely ethics advice to all parts of the Postal Service within the stated goal of 24-48 hours of receipt, ensure that employees in filing positions accurately file financial disclosure forms, analyzes all OIG reports of investigation for ethics violations and advises Human Resources of such violations, and provide a multitude of live training throughout the year. In addition, consistent with the recommendation, we will identify specific areas of focus that should be priorities for the organization, which will be discussed and vetted with the cross-functional team established pursuant to Recommendation #1. Once established, the General Counsel will work with the Ethics Office to design goals for each priority area and to identify the desired maturity level for each priority area. In that regard, the Ethics Office will analyze the ethics violation trends in FY19, and then adjust our training and increase our messaging to address the most frequently occurring ethics violations. Thus, the Ethics Office will address the most frequent ethics violations as a priority, and design future goals to address those priority areas.

Target Implementation Date: March 31, 2019
Responsible Management Official: General Counsel

Recommendation #3

We recommend **the General Counsel and Executive Vice President** devise metrics, collect necessary data, expand analyses, and connect related metrics each ethics program priority area to monitor progress toward the target maturity level and goals of the organization's ethics program.

Management's Response

We agree with this recommendation, within the confines noted above. In that regard, the General Counsel will work with the Ethics Office to devise metrics and collect necessary data to monitor progress towards the priorities that are identified. In the interim, the Ethics Office will continue to assess the effectiveness of the Ethics Program in the context of OGE's mandatory requirements. OIG has suggested possible analyses that the Ethics Office could undertake that would make the Ethics Program more mature under the OIG's criteria. The Ethics Office will at a minimum adopt the following:

- (1) In addition to performing the analysis of OIG reports of investigation on a quarterly basis to obtain statistics and trends, the Ethics Office will also analyze this data by Area.

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- (2) As discussed in response to the first recommendation, the Ethics Office will meet periodically with representatives from Human Resources, Labor Relations, and the Law Department's Employment and Labor Law Section to discuss ethics violation trends found in OIG reports of investigation, and to collectively design mitigation strategies in an effort to eliminate or ameliorate such trends.
- (3) The Ethics Office will deploy a survey and pre and post quizzes for live training.
- (4) The Ethics Office will analyze trends in Ethics Helpline request topics following ethics training.

Target Implementation Date: March 31, 2019
Responsible Management Official: General Counsel



Thomas J. Marshall

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