



UNITED STATES GOVERNMENT PRINTING OFFICE
OFFICE OF THE INSPECTOR GENERAL

memorandum

DATE: September 30, 2003

REPLY TO

ATTN OF: Joseph Verch, Supervisory Auditor

SUBJECT: Report on GPO's Corrective Action and Other Employee Programs.

To: Director, Labor and Employee Relations

Attached are the results of an Office of Inspector General (OIG) performance audit on the responsibilities of the Employee Relations Branch (ERB) in administering GPO's: (1) Corrective Action Program and (2) other employee programs that include Combined Federal Campaign, Career Service Awards, and the Blood Donor. We found that the controls over the fair and timely processing of suspensions, removals, letters of warning, and internal investigations were not in compliance within the timeframes established in the Director's Correspondence Schedule and GPO Instruction 825.18A *Internal Control Program*:

1. ERB specialists were not always timely in preparing the final letter to the Deciding Official on suspensions and removals within the Director's Correspondence Schedule of 64 calendar days, after receipt of GPO Form 2021, in Fiscal Year 2002 and through March 31, 2003, that resulted in four employees remaining on the payroll and receiving an additional \$43,181;
2. ERB specialists were not always timely in preparing letters of warning within the Director's Correspondence Schedule of 25 calendar days in Fiscal Year 2002 and through March 31, 2003;
3. ERB specialists were not always timely or complete in preparing memorandums to supervisors on recommending corrective action from an internal investigation after receiving an incident report from GPO's Uniform Police Branch (UPB); and

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4. An Internal Control Program has not been established.

However, we also found that overall, ERB specialists performed efficiently and effectively in promoting the employee programs of the Combined Federal Campaign, Career Service Awards, and the Blood Donor that resulted in an appropriate management-employee relationship in GPO.

This report contains four major and several related recommendations to improve the internal controls over the fair and timely processing of suspensions and removals, letters of warning, internal investigations, incident reports and other programs. At the September 4, 2003, exit conference, the Director specifically concurred with the 5 findings and the 11 recommendations. However, the Director's written comments only concurred in general terms to take corrective action. (See Appendix VIII)

Mr. Joseph Verch, Supervisory Auditor, and Ms. Patricia Mitchell, Auditor, conducted this audit.

I appreciate the cooperation and courtesies extended during the audit by the officials and staff of the Office of Labor and Employee Relations and the Office of Chief of Staff.

MARC A. NICHOLS
INSPECTOR GENERAL

By: _____
Joseph J. Verch Jr., Supervisory Auditor

**REPORT ON GPO'S CORRECTIVE ACTION
AND OTHER EMPLOYEE PROGRAMS**

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**U.S. Government Printing Office
Office of the Inspector General
Office of Audits**

REPORT ON GPO'S CORRECTIVE ACTION AND OTHER EMPLOYEE PROGRAMS

RESULTS IN BRIEF

The Government Printing Office (GPO) Office of Inspector General (OIG) has completed a performance audit on the responsibilities of the Employee Relations Branch (ERB) in administering GPO's: (1) Corrective Action Program and (2) other employee programs that include Combined Federal Campaign, Career Service Awards, and the Blood Donor. The primary objective of the audit was to determine whether ERB was carrying out its responsibilities in a fair and timely manner, in accordance with all applicable laws and regulations, and with due regard for the rights of GPO employees. The audit was also conducted to determine whether ERB promotes efficiency and effectiveness in other GPO programs and operations and whether ERB fosters an appropriate management-employee relationship in GPO.

The OIG conducted the performance audit from January through May 2003 and found that opportunities existed for the Branch Chief to improve controls over the fair and timely processing of suspensions, removals, letters of warning, and internal investigations in accordance with Labor and Employee Relations (LE) Director's Correspondence Schedule and GPO Instruction 825.18A, *Internal Control Program*. The OIG identified the following four internal control weaknesses:

1. ERB specialists were not always timely in preparing the final letter to the Deciding Official on suspensions and removals within the Director's Correspondence Schedule of 64 calendar days, after receipt of GPO Form 2021, in Fiscal Year 2002 and through March 31, 2003, that resulted in four employees remaining on the payroll and receiving an additional \$43,181;
2. ERB specialists were not always timely in preparing letters of warning within the Director's Correspondence Schedule of 25 calendar days in Fiscal Year 2002 and through March 31, 2003;
3. ERB specialists were not always timely or complete in preparing a memorandum to the supervisor on recommending corrective action from an internal investigation after receiving an incident report from GPO's Uniform Police Branch (UPB); and
4. An Internal Control Program has not been established.

We also found, however, that the ERB specialists performed efficiently and effectively in promoting GPO programs and operations of the Combined Federal Campaign Program, Career Service Awards Program, and the Blood Donor Program that resulted in an appropriate management-employee relationship in GPO.

MAJOR RECOMMENDATIONS

To improve the internal controls over the fair and timely processing of suspensions, removals, letters of warning, internal investigations, incident reports, and other programs, the OIG recommends the Director, LE, should ensure that:

1. The Branch Chief enforces the Director's Correspondence Schedule of 64 calendar days for processing final letters to Deciding Officials by more closely monitoring the administering of future suspensions and removals by ERB specialists;
2. The Branch Chief enforces the Director's Correspondence Schedule of 25 calendar days for providing employees' supervisors letters of warning by more closely monitoring the administering of future letters of warning by ERB specialists;
3. The Branch Chief develops and enforces a written timeframe, such as the correspondence schedules for removals, suspensions, and letters of warning, for ERB specialists to complete future internal investigations in a timely manner; and
4. An Internal Control Program is established for the Labor and Employee Relations Branch through the performance of vulnerability assessments and internal control reviews as prescribed by GPO Instruction 825.18A.

In addition, the OIG identified three "Other Matters" (See Appendix I) that were identified during the audit and discussed with management officials without any formal recommendations being made:

1. ERB specialists were not always consistent in requesting Deciding Officials to respond within the Director's Correspondence Schedule of 5 calendar days to the Douglas Factors memorandum for suspensions and removals that resulted in responses being received late;
2. ERB specialists were not always consistent in requesting the employee to respond within the Director's Correspondence Schedule of 15 calendar days to the proposed letter for suspensions and removals that resulted in late responses; and
3. ERB's purchases for other GPO employee programs experienced a lengthy process through Materials Management Service's Small Purchase Section that resulted in some items needing to be ordered in bulk.

BACKGROUND

ERB consists of a Branch Chief and three specialists who administer the corrective action program for GPO and provide advice and assistance to supervisors and managers on employee relations' problems. In Fiscal Year 2002, the Branch Chief received requests from supervisors and managers for assistance in taking corrective actions against 60 GPO employees in the form of a letter of warning, a suspension, or a removal. In Fiscal Year 2003 (as of March 31, 2003) 23 requests had been received.

The Branch Chief assigns a specialist for each of the three shifts. The specialists conduct investigations of incidents relating to misconduct or any other matters in the employee relations area. In Fiscal Year 2002, the Branch Chief received 12 incident reports, and in Fiscal Year 2003, 4 incident reports had been submitted through January 26, 2003.

The Branch Chief uses weekly reports prepared by the specialists to monitor the status of the outstanding cases. The weekly reports are then forwarded to the Director, Labor and Employee Relations, for review. The Director developed timeframes titled Correspondence Schedules for the specialists to follow to ensure that removals, suspensions, and letters of warning are completed in a timely manner. Removals and suspensions are required to be processed within 64 calendar days. Letters of warning are required to be processed within 25 calendar days.

The specialists also act as technical representatives in all GPO proceedings before the Merit Systems Protection Board and in arbitrations concerning disciplinary actions. In addition, the specialists are responsible for administering the Combined Federal Campaign, the Blood Donor Program, the Suggestion Program, the Career Service Award Program, and the GPO Drug-Free Workplace Program in coordination with the Health Unit. Through these employee programs, the specialists help to foster an appropriate management-employee relationship.

OBJECTIVES, SCOPE, AND METHODOLOGY

The primary objective of this OIG performance audit was to determine whether the ERB was carrying out its responsibilities in a fair and timely manner, in accordance with all applicable laws and regulations, and with due regard for the rights of GPO employees. The audit was also to determine whether the ERB promotes efficiency and effectiveness in other GPO programs and operations that include Combined Federal Campaign, Career Service Awards, and the Blood Donor Program. In addition, the auditors wanted to determine whether the Branch fosters an appropriate management-employee relationship in GPO.

Audit fieldwork was conducted during the period of January through May 2003 in accordance with generally accepted Government auditing standards.

To meet the objectives of the audit, the OIG audit team:

- Interviewed Labor and Employee Relations personnel regarding the: (1) processing of suspensions, removals, letters of warning, and internal investigations and (2) promotion of GPO programs and operations of the Combined Federal Campaign Program, Career Service Awards Program, and the Blood Donor Program;
- Interviewed GPO's managers and supervisors on their opinions as to whether the ERB fosters an appropriate management-employee relationship in GPO;
- Reviewed ERB's Corrective Actions Log (Letters of Warning and Suspensions/Removals) for Fiscal Year 2002 and through March 31, 2003;
- Reviewed ERB's Incident Reports Log for Fiscal Years 2002 and through January 26, 2003;
- Reviewed the Labor and Employee Relations Director's standard operating procedures for the ERB;
- Reviewed the Branch Chief's draft standard operating procedures for the Combined Federal Campaign, Career Service Awards, and the Blood Donor;
- Reviewed the Labor and Employee Relations Director's Correspondence Schedule for ERB personnel on Letters of Warning and Suspensions/Removals;

- Reviewed the available training for ERB personnel;
- Reviewed the Comptroller's Asset Inventory Report for the Labor and Employee Relations Branch for January 28, 2003, to perform an inventory of accountable equipment;
- Reviewed weekly reports submitted by ERB specialists for the weeks ending September 6, 2002, and January 3, 2003, for a better understanding of the backlog in Fiscal Year 2002 and after the first quarter of Fiscal Year 2003;
- Reviewed the ordering and purchasing of items for ERB from the Purchase Request Log for Fiscal Year 2002 and through March 17, 2003;
- Reviewed the system of controls in place against fraud, waste, abuse, and mismanagement; and
- Examined the files from GPO's Corrective Action Program maintained at the ERB.

In the course of our work, we also assessed the susceptibility of various aspects of the ERB programs to fraud, waste, and abuse. In addition, we reviewed the following publications and instructions that contained procedures and policies that ERB personnel are required to follow:

1. GPO Instruction 105.1B, *Ch-25 Organization and Functions of the Government Printing Office* to identify the Office of Labor and Employee Relations' policies governing labor relations, employee relations, and employee programs;
2. GPO Instruction 630.5 *Zero Violence in the Workplace* to identify the policy to provide all employees, customers, and visitors to GPO facilities a safe and healthy work environment;
3. GPO Instruction 655.1 *Employee Conduct* to identify related rules and regulations on employees' conduct;
4. GPO Instruction 655.4A *Corrective Actions* to identify general guidelines and penalties used by GPO in processing corrective actions;
5. GPO Instruction 680.1B *Agency Administrative Grievance System* to identify procedures by which employees may seek adjustment in a personnel matter that concerns them or dissatisfaction regarding specific aspects of employment;
6. GPO Instruction 805.27A *Obtaining, Using, and Safeguarding Commercial Credit Cards* to identify the established guidelines and procedures for commercial credit

card purchases for supplies or services;

7. GPO Instruction 810.11A *Property Management Program* to identify property management responsibilities and applicable policies and procedures governing the Program;
8. GPO Instruction 825.18A *Internal Control Program* to identify policies, standards, and responsibilities for conducting internal control reviews of GPO programs;
9. U.S. Code of Federal Regulations, Title 5, Part III, Subpart F, Chapter 75, Subchapter IV, Sec. 7532 *Suspension and Removal* to identify when an agency can suspend or remove employees;
10. U.S. Code of Federal Regulations Ch. 1, Title 5, Part 315.804 *Termination of Probationers for Unsatisfactory Performance or Conduct* to identify the statutory requirements for terminating an employee serving a probationary period;
11. U.S. Code of Federal Regulations, Title 5, Part 752 *Adverse Actions* to identify the principal statutory requirements for adverse actions;
12. U.S. Code of Federal Regulations, Title 5, Part 950.103 *Establishing a Local Campaign* to identify the establishing and maintaining of the Combined Federal Campaign; and
13. ISBN 0-936295-06-6 *The Federal Manager's Guide to Discipline* to identify practical information that Federal managers and supervisors need in order to effectively use the disciplinary process.

FINDINGS AND RECOMMENDATIONS

1. SUSPENSIONS AND REMOVALS

BACKGROUND

The purpose of corrective action (suspensions and removals) against employees is to maintain an efficient, productive, and orderly work environment. The ability to take corrective action provides supervisors and managers a tool to enforce the rules, regulations, and work requirements that allow GPO to accomplish its mission in an effective and efficient manner. ERB administers GPO's Corrective Action Program and provides advice and assistance to supervisors and managers on employee relations' problems. The primary objective of the Corrective Action Program is to correct a problem in a timely manner.

GPO's Corrective Action Program progresses from an oral reprimand, to a letter of warning, to a suspension, and finally a removal. On suspensions, GPO managers may choose a paper suspension or have an employee formally directed to remain away from GPO for a specified period of time, without pay. The majority of the suspensions given to employees are paper, because this allows the employee to remain on the job. In addition, suspensions are permanently recorded in an employee's official personnel folder and may be taken into account in later personnel actions.

Removals are the most severe disciplinary action that can be taken against an employee. Removals are only used when:

- A first offense is so serious that GPO has no interest in correcting an employee; or
- Successive severe disciplinary penalties have not succeeded in correcting an employee's conduct and GPO concludes that further corrective action is unlikely to be effective.

When corrective action needs to be taken against a GPO employee, supervisors are required to complete GPO Form 2021 *Recommendation for Corrective Action* and forward it to the next level of management for concurrence prior to holding a meeting to inform the employee of the recommended action. The GPO Form 2021 is then forwarded to GPO's ERB.

FINDING

The Branch Chief maintains a Corrective Actions Log by fiscal year and assigns a case and a specialist to each GPO Form 2021 request for removal or suspension that is received. An OIG review of the Corrective Actions Logs for Fiscal Years 2002 and as of March 31, 2003, disclosed that ERB specialists were not always timely in preparing the final letter to the Deciding Official on suspensions and removals within the required 64 calendar days after receipt of GPO Form 2021 as prescribed by the Labor and Employee Relations (LE) Director's Correspondence Schedule:

- In FY02, the average time it took ERB specialists to provide the Deciding Official the final letter was 152.6 days for 11 of 12¹ letters that ranged from 74 to 227 calendar days (See Appendix II); and
- For the period audited in FY03, the average time reduced slightly for 4 of 5² letters to 146.8 days that ranged from 99 to 173 calendar days. (See Appendix III)

The OIG auditors found that while the Director, LE, required a weekly status report from the ERB specialists on their active cases, the Branch Chief was not enforcing the Director's Correspondence Schedule by monitoring the administration of the suspensions and removals by the ERB specialists. In addition, the Branch Chief was not always assigning the cases to the specialists immediately after GPO Form 2021 was received. This contributed to letters being sent to the Deciding Officials in an untimely manner:

- For the 11 cases in FY02, the Branch Chief took an average of 10 calendar days, ranging from 1 to 32 days to assign a specialist to a case; and
- For the 4 cases in FY03 (as of March 31, 2003), the Branch Chief improved the average time to 6.3 calendar days, ranging from 1 to 19 days to assign a specialist to a case.

Our audit also found that the Branch Chief assigned two ERB specialists to work on the FY03 Combined Federal Campaign (CFC), which contributed to the untimeliness for two suspensions/removals. One case was delayed a week, while the other case was delayed for 2 weeks as a result of the FY03 CFC assignment.

¹ The 12th letter (ERB Case #02-38) was for a probationary employee having less than a year of government service, so the ERB specialist did not need to follow the usual steps in processing this removal. As a result, the case was not considered in the OIG review.

² The 5th letter (ERB Case #03-18) was for a probationary employee having less than a year of government service, so the ERB specialist did not need to follow the usual steps in processing this removal. As a result, the case was not considered in the OIG review.

The OIG auditors found that the untimeliness in providing final letters to the Deciding Officials for four removals contributed to the employees remaining on GPO’s payroll at a cost of \$43,181. This is contrary to Standards 2 and 7 of GPO Instruction 825.18A, *Internal Control Program*, which states:

“Management controls must provide reasonable assurance and safeguards to protect assets against waste, loss, unauthorized use, and misappropriation. Management controls developed for agency programs should be logical, applicable, reasonably complete, and effective and efficient in accomplishing management objectives.” (Standard 2)

“Transactions should be promptly recorded, properly classified, and accounted for in order to prepare timely accounts and reliable financial and other reports.” (Standard 7)

As a result of the untimeliness in providing final letters, the four employees received salaries ranging from \$1,545 to \$17,353 to which they were not entitled. As the table below discloses, GPO unnecessarily paid \$43,184 in salaries due to nonadherence to the 64-day calendar.

Untimeliness on Administering Removals

1	2	3	4	5	6	7	8
No.	Employee	Process Final Letter (calendar days)	Director’s Schedule (calendar days)	Difference (calendar days) (#3 - #4)	Convert to weeks (#5 divide by 7 days)	Weekly Salary	Additional Payments (#6 x #7)
1	A	169	64	105	15.0	\$852.40	\$12,786
2	B	212	64	148	21.1	\$822.40	\$17,353
3	C	168	64	104	14.9	\$771.60	\$11,497
4	D	74	64	10	1.4	\$1,103.60	\$1,545
Totals							\$43,181

The lack of timeliness in administering suspensions and removals by ERB specialists can also be detrimental to the employees’ supervisors and managers who are trying to maintain the morale, efficiency, and productivity of the workplace.

RECOMMENDATIONS

The Director, LE, should ensure that the Branch Chief:

- Enforces the Director’s Correspondence Schedule of 64 calendar days for processing final letters to Deciding Officials by more closely monitoring the administering of future suspensions and removals by ERB specialists (0308-01);

- Immediately assigns future suspension and removal cases to ERB specialists upon receipt of GPO Form 2021s (0308-02); and
- Does not allow ERB specialists to be assigned to future Combined Federal Campaigns and other LE Programs (awards and blood donor) (0308-03).

MANAGEMENT COMMENTS

The Director, LE, agreed in general terms with the finding and the three recommendations. (See Appendix VIII)

2. LETTERS OF WARNING

BACKGROUND

A letter of warning is a formal letter given to an employee that outlines specific unacceptable conduct and usually states that such conduct will not be tolerated in the future. Unlike oral reprimands, a letter of warning is considered a formal disciplinary action and a copy is entered into the employee's official personnel folder for a period of 2 years. While it is in the employee's folder, it may be taken into account for a variety of purposes, including future personnel actions taken against the employee.

FINDING

The Branch Chief maintains a Corrective Actions Log by fiscal year and assigns a case number and a specialist to each GPO Form 2021 request for a letter of warning that is received. An OIG review of the Corrective Actions Logs for Fiscal Year 2002 and through March 31, 2003, disclosed that ERB specialists were not timely in preparing 20 of 21 letters of warnings within the 25 calendar days, as prescribed by the Director's Correspondence Schedule:

- In FY02, the average time it took ERB specialists to provide the employee's supervisor a letter of warning was 50.1 days for 14 letters. The 14 letters ranged from 40 to 104 calendar days (See Appendix IV); and
- For the period audited in FY03 (as of March 31, 2003), the average time rose to 79.9 days for 7 letters that ranged from 57 to 119 calendar days. (See Appendix V)

The OIG auditors found that the Branch Chief was not enforcing the Director's Correspondence Schedule by monitoring the administering of letters of warning issued by ERB specialists. Standard 5 of GPO Instruction 825.18A requires managers "...to exercise appropriate oversight to ensure that individuals do not exceed or abuse their assigned authorities."

In addition, the Branch Chief did not always assign cases to the specialists immediately after GPO Form 2021 was received. This contributed to an untimely issuance of letters of warning to the employee's supervisor:

- For the 14 cases assigned in FY02, the Branch Chief took an average of 6.2 calendar days, ranging from 1-12 days, to assign a specialist to a case; and
- In FY03 (as of March 31, 2003), the average time rose to 9.1 calendar days, ranging from 1 to 19 days for 7 cases.

RECOMMENDATIONS

The Director, LE, should ensure that the Branch Chief:

- Enforces the Director's Correspondence Schedule of 25 calendar days for providing employees' supervisors letters of warning by more closely monitoring the administering of future letters of warning issued by ERB specialists (0308-04); and
- Immediately assigns future letter of warning cases to ERB specialists upon receipt of GPO Form 2021s (0308-05.)

MANAGEMENT COMMENTS

The Director, LE, agreed in general terms with the finding and the two recommendations. (See Appendix VIII)

3. INTERNAL INVESTIGATIONS

BACKGROUND

The Branch Chief maintains an Incident Report Log by fiscal year and assigns a case number and a specialist to each incident report received to determine if corrective action is needed. Once an internal investigation has been completed, the specialist prepares a memorandum to the employee's supervisor recommending corrective action. The supervisor considers the 12 Douglas factors before determining the corrective action. This would include various elements of the employee's job history such as the employee's job level, the employee's past disciplinary, work record, and the seriousness of the offense, etc.

FINDING

An OIG audit of the Incident Report Logs for Fiscal Year 2002 and through January 26, 2003, disclosed that ERB specialists were not always determining whether corrective action was needed in a timely manner after receiving an incident report from GPO's Uniform Police Branch (UPB). ERB specialists prepared incomplete memorandums to the employee's supervisor to recommend corrective action after performing an internal investigation. There were no management controls over the monitoring of the internal investigations by the Branch Chief, contrary to Standard 5 of GPO Instruction 825.18A.

1. In FY02, the specialists averaged 35.1 calendar days to complete and report the results of internal investigations for 9 incidents to the employee's supervisor. The reporting time for the 9 incidents ranged from 9 to 148 calendar days. However, if a case that took 148 calendar days was removed, the average time for the remaining 8 cases was 21 calendar days. (See Appendix IX)

In FY03 (as of January 26, 2003) ERB specialists had completed only two of three incident reports that were received from UPB, and it took 30 and 68 days to process them. The third incident report had not been completed as of March 5, 2003, when the OIG auditor stopped fieldwork and brought it to the attention of the Branch Chief. The Branch Chief immediately started an ERB investigation, 108 calendar days after receipt of the incident report from UPB. (See Appendix X)

2. Nine memorandums in FY02 and the two for FY03 were incomplete:
 - In FY02, 7 of the 9 memorandums did not contain the 12 Douglas factors needed by the supervisor to consider the corrective action to be taken against the employee. This continued in FY03 where 1 of the 2 memorandums also did not contain the 12 Douglas Factors.

- In FY02, the nine memorandums were inconsistent in providing timeframes for supervisors to respond back to the ERB. This ranged from no timeframes being given (4 cases); 5 calendar days (2 cases); 6 calendar days (1 case); and 7 calendar days (2 cases). This inconsistency continued in FY03 where one of the two completed memorandums did not give a timeframe.
- In FY02, four memorandums were inconsistent in recommendations that were given for corrective action to be taken for the same charges (use of a parking permit that was reported lost). One ERB specialist recommended a verbal warning; another specialist handling two cases recommended letters of warning; and a third specialist failed to make a recommendation, choosing instead to provide a penalty range of verbal warning to removal. While the charges were different in the two cases in FY03, the specialists also were inconsistent in the specificity of the penalty recommendations that they made. One specialist recommended a specific penalty of a verbal warning while the other chose to provide a penalty range of a verbal warning to removal, rather than recommend a specific penalty.

RECOMMENDATIONS

The Director, LE, should ensure that the Branch Chief:

- Develops and enforces a written timeframe, such as the correspondence schedules for removals, suspensions, and letters of warning, for ERB specialists to complete future internal investigations in a timely manner (0308-06);
- Requires the 12 Douglas factors to be mentioned in future memorandums to the employees' supervisors when recommending corrective action as a result of an internal investigation (0308-07);
- Requires ERB specialists to provide a consistent timeframe for the employee's supervisor to respond to the specialist about the results of future internal investigations (0308-08); and
- Requires ERB specialists to be consistent in recommending either a specific penalty or a penalty range in their future memorandums to the employee's supervisor (0308-09).

MANAGEMENT COMMENTS

The Director, LE, agreed in general terms with the finding and the four recommendations. (See Appendix VIII)

4. ACCOUNTABLE EQUIPMENT

BACKGROUND

The GPO has substantial property (computers, monitors, typewriters, presses, etc.) that requires safeguarding and accountability. The Comptroller's General Ledger and Property Section maintains a database inventory of accountable property by GPO's 215 cost codes. The accountable property has individual GPO ID numbers assigned for better inventory control. Property custodians periodically conduct verification updates of the General Ledger and Property Section's property inventory listing by cost codes. Proper physical use and safekeeping of assigned GPO property is the responsibility of the property custodians. Surplus property is generally transferred to the Materials Management Services, Stores Division, for disposition.

FINDING

The Comptroller's Asset Inventory Report for the Labor and Employee Relations Branch (Cost Code 0092) for January 28, 2003, listed 45 items having a current cost value totaling \$60,585 and a net book value of \$39,802. The auditors performed an inventory of the 45 items on February 24, 2003, and found four discrepancies in the Inventory Report:

1. Fourteen items, consisting of mostly monitors, hard drives, and printers that were reported on the Inventory Report, were not located in the Labor and Employee Relations Branch. The property custodian had documentation that one monitor, IHM8421, had been transferred to the Administrative Law Judge on March 17, 1999;
2. Five additional items that were found in the Labor and Employee Relations Branch were not listed on the Inventory Report. The property custodian stated that the five items were received from Stores Division, but the custodian could only provide an undated document for the receipt of only one of the five items (ScanJet 6200CC Scanner);
3. Three items (the L790 Canon Fax Machine, W1230 – QMS Magic Color Printer, and the ScanJet 6200CC Scanner) located in the Labor and Employee Relations Branch did not have GPO ID numbers; and
4. The Property Custodian whose name was on the Inventory Report had been transferred to the Office of Workers' Compensation and the new replacement was never reported.

Paragraph 9.c. (1) of GPO Instruction 810.11A *Property Management Program* states:

“...Property Custodians are also responsible for the overall operation of a records system including generating and transmitting timely and accurate forms; verifying computer printouts; taking necessary action to have deficiencies in the records corrected....”

The Property Custodian was not aware of the discrepancies on the Inventory Report.

The four discrepancies identified controls that need to be implemented to ensure the Comptroller’s Asset Inventory Report is accurate in accordance with Paragraph 9.c. of GPO Instruction 810.11A³.

RECOMMENDATION

The Director, LE, should ensure that the Property Custodian for Labor and Employee Relations Branch follows GPO Instruction 810.11B, *GPO Property Management Program*, in updating the Comptroller’s Asset Inventory Report by: (1) removing the 14 items that no longer are present in the Branch; (2) including the 5 unreported items that were located in the Branch; and (3) obtaining new GPO property numbers and identification tags for the L790 Canon Fax Machine, W1230 – QMS Magic Color Printer, and the ScanJet 6200CC Scanner (0308-10).

MANAGEMENT COMMENTS

The Director, LE, agreed in general terms with the finding and the recommendation. (See Appendix VIII)

³ GPO Instruction 810.11A was superseded by GPO Instruction 810.11B, effective June 6, 2003.

5 INTERNAL CONTROL PROGRAM

BACKGROUND

In May 1997 GPO Instruction 825.18A *Internal Control Program* identified the Public Printer as responsible for ensuring that an effective internal control structure be established and maintained by GPO's managers for all programs, functions, and activities. The Deputy Public Printer was made responsible for ensuring that all vulnerability assessments and annual internal control reviews were performed.

The Inspector General annually forwards a letter of compliance to the Public Printer which identifies the results of the annual review for completeness of all vulnerability assessments and internal control reviews that were received from all GPO offices as required by paragraph 7.c. of GPO Instruction 825.18A.

FINDING

The Director, LE, has not establish an Internal Control Program within the Employee Relations Branch through the performance of vulnerability assessments and internal control reviews as prescribed by GPO Instruction 825.18A. A review needs to be conducted to identify specific programs, functions, and activities within LE. Once the specific programs, functions, and activities are identified, tests (vulnerability assessments) need to be performed to provide LE officials reasonable assurance that the Department's programs, functions, and activities are:

- Achieving their intended results;
- Using resources consistently with agency mission;
- Protected from waste, fraud, and mismanagement;
- Following all laws and regulations; and
- Obtaining, maintaining, reporting, and using reliable and timely information for decision-making purposes, as stated in Paragraph 5.c. of GPO Instruction 825.18A.

Any findings resulting from the testing of the internal controls over specific programs, functions, and activities should be followed up by a detailed examination (internal control review), as required by Paragraph 5.b. of GPO Instruction 825.18A.

For example, reviewing internal controls within the following four functions/activities would be a good beginning for an Internal Control Program for the Office of Labor and Employee Relations, as directed by Paragraph 7.d. of GPO Instruction 825.18A:

“Department, Service, Staff, and Office heads are responsible for the development and maintenance of internal controls within their respective programs, functions, and activities, to prevent or deter the loss or abuse of public

assets. The compliance with and effectiveness of internal controls must be regularly monitored. Supervisors must be knowledgeable of the internal controls of their units, and as part of their routine duties, must insure that the controls are operating as designed and are achieving their intended purpose.”

1. Monitoring Suspensions and Removals – ERB specialists were not always timely in preparing the final letter to the Deciding Official on suspensions and removals within the 64 calendar days, after the receipt of the GPO Form 2021, as prescribed by the Director’s Correspondence Schedule. The Chief, ERB does not monitor the processing of suspensions and removals to ensure compliance with the Schedule. By not “...performing actual control tests to ensure events are handled properly...” as prescribed in paragraph 9.b. of GPO Instruction 825.18A, there are no assurances that the existing internal controls ensure the timely completion of suspensions and removals in accomplishing management objectives in accordance with Standards 2 and 7 of GPO Instruction 825.18A.
2. Monitoring Letters of Warnings – ERB specialists were not always timely in preparing the letters of warnings within the 25 calendar days, as prescribed by the Director’s Correspondence Schedule. The Branch Chief does not monitor the processing of letters of warning to ensure compliance with the Schedule. By not “...performing actual control tests to ensure events are handled properly...” as prescribed in paragraph 9.b. of GPO Instruction 825.18A, there are no assurances that the existing internal controls ensure the timely completion of letters of warning in accomplishing management objectives in accordance with Standards 2 and 7 of GPO Instruction 825.18A.
3. Monitoring Internal Investigations – ERB specialists were not always timely or complete in preparing a memorandum to the supervisor in recommending corrective action from an internal investigation after receiving an incident report from GPO’s UPB. The Branch Chief did not monitor the processing of internal investigations to ensure the timeliness. By not “...performing actual control tests to ensure events are handled properly...” as prescribed in paragraph 9.b. of GPO Instruction 825.18A, there are no assurances that the existing internal controls ensure the timely completion of letters of warning in accomplishing management objectives in accordance with Standards 2 and 7 of GPO Instruction 825.18A.
4. Monitoring Accountable Equipment – Discrepancies were found in the Comptroller’s Asset Inventory Report for the Labor and Employee Relations Branches (Cost Code 0092) for January 2003. The Property Custodian was not aware of the discrepancies on the Inventory Report. By not “...performing actual control tests to ensure events are handled properly...” as prescribed in paragraph 9.b. of GPO Instruction 825.18A, there are no assurances that the existing internal controls ensure the Comptroller’s Asset Inventory Report is accurate in accordance with

Standards 2 and 7 of GPO Instruction 825.18A.

RECOMMENDATION

The Director, LE, should ensure that an Internal Control Program is established for the Office of Labor and Employee Relations Branch through the performance of vulnerability assessments and internal control reviews as prescribed by GPO Instruction 825.18A (0308-11).

MANAGEMENT COMMENTS

The Director, LE, agreed in general terms with the finding and the recommendation.
(See Appendix VIII)

OTHER MATTERS DISCUSSED WITH MANAGEMENT

1. ERB specialists were not always consistent in requesting Deciding Officials to respond within the Director’s Correspondence Schedule of 5 calendar days to the Douglas Factors memorandum for suspensions and removals. This resulted in responses being received late. Of 18 suspensions/removals, the Deciding Official responded late in 10 cases ranging from 3 – 108 calendar days. This lateness contributed to the specialists not meeting the 64-day requirements:

Timeframes Requested by ERB Specialists in Their Douglas Factors Memorandum and the Actual Days the Deciding Officials Responded

No.	ERB Case No.	Douglas Factors Memo	Date To Reply By	Days To Respond	Actual Days Responded	Actual Days Late
1	02-00	03/06/02	03/13/02	7	1	
2	02-03	12/19/01	12/28/01	9	No response	
3	02-06	02/15/02	No date	Unlimited	5	
4	02-09	03/04/02	03/11/02	7	22	15
5	02-12	01/30/02	02/15/02	16	30	14
6	02-15	05/28/02	06/04/02	7	14	7
7	02-24	06/13/02	06/21/02	8	27	19
8	02-28	05/21/02	05/28/02	7	16	9
9	02-34	07/09/02	07/16/02	7	1	
10	02-45	10/18/02	10/25/02	7	115	108
11	02-49	09/18/02	09/23/02	5	1	
12	02-58	11/19/02	11/22/02	3	16	13
13	03-02	11/20/02	11/27/02	7	16	9
14	03-03	02/14/03	02/21/03	7	11	4
15	03-05	03/05/03	03/07/03	2	5	3
16	03-07	02/25/03	03/07/03	10	10	
17	03-12	04/09/03	04/11/03	2	1	
18	03-14	03/27/03	04/02/03	6	6	

2. ERB specialists were not always consistent in requesting the employee to respond within the Director’s Correspondence Schedule of 15 calendar days to the proposed letter for suspensions and removals. This resulted in responses being received late. Of 14 suspensions/removals, the employee responded late in 7 cases ranging from 6 – 27 calendar days. For the other 6 cases, ERB specialists did not give a response date and the employees responded up to 28 calendar days to respond. This inconsistency in providing response dates contributed to the specialists not meeting the 64-day requirements:

**Timeframes Requested by ERB Specialists in the Proposed Letter
and the Actual Days the Employees Responded**

No.	ERB Case No.	Proposed Letter Date	Date To Reply By	Days To Respond	Actual Days Responded	Actual Days Late
1	02-00	12/14/01	No date	Unlimited	28	
2	02-03	11/13/01	No date	Unlimited	No response	
3	02-06	01/07/02	No date	Unlimited	16	
4	02-09	01/25/02	02/08/02	14	21	7
5	02-12	12/21/01	No date	Unlimited	19	
6	02-15	04/26/02	No date	Unlimited	15	
7	02-24	04/10/02	04/22/02	12	36	24
8	02-28	04/11/02	04/29/02	18	28	10
9	02-34	06/03/02	06/21/02	18	No response	
10	02-45	09/05/02	09/20/02	15	21	6
11	02-49	08/28/02	09/10/02	13	13	
12	02-58	10/29/02	No date	Unlimited	9	
13	03-02	11/07/02	11/18/02	11	6	
14	03-03	12/19/02	01/03/03	15	24	9
15	03-05	01/29/03	No date	0	27	27
16	03-07	01/31/03	02/14/03	14	9	
17	03-12	03/13/03	03/28/03	15	13	
18	03-14	03/11/03	03/24/03	13	20	7
19	03-16	02/12/03	02/28/03	16	8	
20	03-19	04/15/03	04/28/03	13	Not available	

3. ERB's purchases for other GPO employee programs experienced a lengthy process through Materials Management Services' (MMS) Small Purchase Section that resulted in some items needing to be ordered in bulk. A review of 14 items purchased for Labor and Employee Relations Branches in FY02 disclosed that it took an average of 24.6 calendar days, ranging from 6 to 38 calendar days from the date of the request, for the purchases to be received. In FY03, as of March 10th, two items were purchased for ERB's programs that took an average of 58 calendar days, ranging from 38 to 78 calendar days. The Director, LE, should consider requesting a government credit card from MMS to purchase and receive future items faster and in less quantity in accordance with GPO Instruction 805.27 *Obtaining, Using, and Safeguarding Commercial Credit Cards*.

Purchase Request Logs
Fiscal Year 2002 and Fiscal Year 2003 (as of 03/10/03) Summaries

		Fiscal	Year 2002	Summary			
1	2	3	4	5	6	7	8
No.	Date Of Request	Item Ordered	Estimated Cost	Purpose	Date Ordered	Date Received	Days to Receive (#7 - #2)
1	11/20/01	Beveled Awards	\$220.00	Svc Award	12/06/01	12/28/01	38
2	01/04/02	Ink Pens	\$710.00	CFC	01/15/02	01/18/02	14
3	01/09/02	Beveled Award	\$87.00	Svc Awards	01/10/02	01/15/02	6
4	01/28/02	Rosewood Ink Pens	\$485.00	Svc Awards	01/30/02	02/22/02	25
5	03/13/02	Beveled Awards	\$49.60	Svc Awards	03/22/02	03/29/02	16
6	06/11/02	Certificates & Holders	\$400.00	Svc Awards	06/24/02	06/28/02	17
7	07/03/02	Beveled Award	\$99.20	Svc Awards	07/03/02	07/15/02	12
8	08/06/02	Water Bottles	\$300.00	CFC	08/08/02	09/09/02	33
9	08/16/02	Marble in Certificate	\$4,160.00	Svc Awards	09/13/02	09/24/02	39
10	09/12/02	Key chains & Clocks	\$2,500.00	CFC	09/13/02	10/11/02	29
11	09/18/02	Certificate Holders	\$520.00	Svc Awards	10/09/02	10/18/02	30
12	09/24/02	Whisper Cut Vase	\$215.00	Svc Awards	09/25/02	10/24/02	30
13	09/26/02	Custom Stamp	\$7.25	Svc Awards	10/15/02	10/24/02	28
14	09/20/02	Beveled Awards	\$280.00	Svc Awards	09/20/02	10/18/02	28
		Total	\$10,033.05			Average	24.6
		Fiscal	Year 2003	Summary			
1	12/19/02	Beveled Awards	\$284.80	Svc Awards	02/12/03	03/07/03	78
2	12/19/02	Certificate Holders	\$277.50	Svc Awards	12/24/02	01/27/03	38
		Total	\$562.30			Average	58

**DIRECTOR'S CORRESPONDENCE SCHEDULE FOR SUSPENSIONS/REMOVALS
AFTER THE RECEIPT OF FORM 2021 (FY02)**

1	2	3	4	5	6	7	8	9	10	11
No. S/R	ERB Case No.	Date 2021 Stamped	Date Assigned ERB Specialist	Letter To Union (2 days) (#5 - #3)	Meeting With Empl Supr (5 days) (#6 - #4)	Draft Letter To Chief (13 days) (#7 - #4)	Draft Letter to Director (2 days) (#8 - #7)	Review Completed (9 days) (#9 - #8)	Letter to Proposing Official (24 days) (#10 - #3)	Letter to Employee (2 days) (#11 - #10)
1R	02-00	10/03/01	10/04/01 (1 day)	10/03/01 (1 day)	No Document	10/30/01 (26 days)	10/30/01 (1 day)	12/14/01 (45 days)	12/14/01 (72 days)	12/19/01 (5 days)
2S	02-06	10/30/01	11/05/01 (6 days)	11/05/01 (6 days)	No Document	11/20/01 (15 days)	12/05/01 (15 days)	01/07/02 (33 days)	01/07/02 (69 days)	01/14/02 (7 days)
3R	02-09	11/02/01	11/08/01 (6 days)	N/A ¹	No Document	12/18/01 (40 days)	No Document	01/25/02 (38 days)	01/25/02 (84 days)	No Document
4S	02-12	11/15/01	11/21/01 (6 days)	N/A ¹	No Document	11/28/01 (7 days)	12/05/01 (7 days)	12/21/01 (16 days)	12/21/01 (36 days)	12/26/02 (5 days)
5R	02-15	12/01/01	12/20/01 (19 days)	N/A ¹	02/01/02 (43 days)	04/04/02 (105 days)	04/25/02 (21 days)	04/26/02 (1 day)	04/26/02 (146 days)	04/29/02 (3 days)
6R	02-24	02/07/02	03/11/02 (32 days)	N/A ¹	No Document	N/A	03/20/02 (41 days)	04/10/02 (21 days)	04/10/02 (62 days)	04/30/02 (20 days)
7R	02-28	02/28/02	03/12/02 (12 days)	03/11/02 (11 days)	03/18/02 (6 days)	04/05/02 (24 days)	04/08/02 (3 days)	04/11/02 (3 days)	04/11/02 (42 days)	04/12/02 (1 day)
8R	02-34	04/29/02	05/21/02 (22 days)	05/20/02 (21 days)	No Document	05/21/02 (1 day)	05/22/02 (1 day)	06/03/02 (12 days)	06/03/02 (36 days)	06/05/02 (2 days)
9R	02-45	07/29/02	07/31/02 (2 days)	07/30/01 (1 day)	No Document	N/A	08/23/02 (23 days)	09/05/02 (13 days)	09/05/02 (38 days)	09/09/02 (4 days)
10S	02-49	07/26/02	07/29/02 (3 days)	07/29/02 (3 days)	08/07/02 (9 days)	08/15/02 (17 days)	08/20/02 (5 days)	08/28/02 (8 days)	08/28/02 (33 days)	08/29/02 (1 day)
11S	02-58	09/25/02	09/26/02 (1 day)	09/26/02 (1 day)	No Document	N/A	10/23/02 (27 days)	10/29/02 (6 days)	10/29/02 (34 days)	10/29/02 (1 day)
		Average	10 days	6.3 days	19.3 days	29.4 days	14.4 days	17.8 days	59.3 days	4.9 days

¹ Non-union member.

**DIRECTOR'S CORRESPONDENCE SCHEDULE FOR SUSPENSIONS/REMOVALS
AFTER THE RECEIPT OF FORM 2021 (FY02)**

1	2	12	13	14	15	16	17	18	19	20	21
No. S/R	ERB Case No.	Oral or Written Reply (15 days) (#12-#11)	Notes to Deciding Official (2 days) (#13-#12)	Notes fm Deciding Official (2 days) (#14-#13)	Douglas Deciding Official (6 days) (#15-#12)	Deciding Official Respond (5 days) (#16-#15)	Draft Letter to Chief (7 days) (#17-#16)	Draft Letter to Director (2 days) (#18-#17)	Review Complete (3 days) (#19-#18)	Final Ltr To Deciding Official (64 days) (#20-#3)	Letter To Employee (65 days) (#21-#3)
1R	02-00	01/16/02 (28 days)	01/23/02 (7 days)	No Document	03/06/02 (49 days)	03/06/02 (1 day)	03/14/02 (8 days)	No Document	04/09/02 (26 days)	04/09/02 (188 days)	04/10/02 (189 days)
2S	02-06	02/07/02 (16 days)	No Document	No Document	02/15/02 (8 days)	02/20/02 (5 days)	03/08/02 (5 days)	No Document	04/12/02 (35 days)	04/12/02 (164 days)	04/17/02 (169 days)
3R	02-09	02/20/02 (5 days)	No Document	No Document	03/04/02 (17 days)	03/26/02 (22 days)	04/04/02 (9 days)	No Document	05/01/02 (27 days)	05/01/02 (180 days)	05/02/02 (181 days)
4S	02-12	No Document	No Document	No Document	01/30/02 (16 days)	03/01/02 (30 days)	03/07/02 (6 days)	03/19/02 (6 days)	04/03/02 (14 days)	04/03/02 (139 days)	04/10/02 (146 days)
5R	02-15	05/22/02 (8 days)	No Document	No Document	05/28/02 (14 days)	06/11/02 (14 days)	06/19/02 (8 days)	No Document	07/01/02 (12 days)	07/01/02 (212 days)	07/01/02 (212 days)
6R	02-24	06/05/02 (36 days)	06/06/02 (1 day)	N/A	06/13/02 (8 days)	07/10/02 (27 days)	N/A	07/16/02 (6 days) ²	07/25/02 (9 days)	07/25/02 (168 days)	07/25/02 (168 days)
7R	02-28	No Document	No Document	No Document	05/21/02 (11 days)	06/06/02 (16 days)	06/24/02 (18 days)	06/27/02 (3 days)	07/03/02 (6 days)	07/03/02 (125 days)	07/03/02 (125 days)
8R	02-34	N/A	N/A	N/A	07/09/02	07/09/02 (1 day)	07/09/02 (1 day)	07/10/02 (1 day)	07/11/02 (1 day)	07/11/02 (74 days)	07/16/02 (79 days)
9R	02-45	09/30/02 (21 days)	No Document	No Document	10/18/02 (18 days)	02/10/03 (115 days)	02/28/03 (18 days)	03/07/03 (7 days)	03/13/03 (6 days)	03/13/03 (227 days)	03/13/03 (227 days)
10S	02-49	09/11/02 (13 days)	No Document	No Document	09/18/02 (7 days)	10/07/02 (19 days)	10/07/02 (1 day)	10/08/02 (1 day)	11/01/02 (24 days)	11/01/02 (97 days)	11/01/02 (97 days)
11S	02-58	11/07/02 (9 days)	No Document	No Document	11/19/02 (13 days)	12/05/02 (16 days)	12/18/02 (13 days)	01/06/03 (19 days)	01/08/03 (2 days)	01/08/03 (105 days)	01/09/03 (106 days)
	Aver.	20.6 days	4.6 days	0 days	16.1 days	24.2 days	9.8 days	6.1 days	14.7 days	152.6 days	154.5 days

² The Director took 6 days after the Deciding Official responded. See Column #16.

**DIRECTOR'S CORRESPONDENCE SCHEDULE FOR SUSPENSIONS/REMOVALS
AFTER THE RECEIPT OF FORM 2021 (FY03 – as of 03/31/03)**

1	2	3	4	5	6	7	8	9	10	11
No. S/R	ERB Case No.	Date 2021 Stamped	Date Assigned ERB Specialist	Letter To Union (2 days) (#5 - #3)	Meeting With Empl Supr (5 days) (#6 - #4)	Draft Letter To Chief (13 days) (#7 - #4)	Draft Letter to Director (2 days) (#8 - #7)	Review Completed (9 days) (#9 - #8)	Letter to Proposing Official (24 days) (#10 - #3)	Letter to Employee (2 days) (#11 - #10)
1S	03-02	10/08/02	10/08/02 (1 day)	N/A ¹	No Document	10/25/02 (17 days)	10/30/02 (5 days)	11/07/02 (8 days)	11/07/02 (30 days)	11/07/02 (1 day)
2S	03-03	10/16/02	10/17/02 (1 day)	10/17/02 (1 day)	No Document	11/26/02 (40 days)	12/17/02 (21 days)	12/19/02 (2 days)	12/19/02 (64 days)	12/24/02 (5 days)
3R	03-05	11/01/02	11/05/02 (4 days)	11/05/02 (4 days)	No Document	11/20/02 (15 days)	01/17/03 (58 days)	01/29/03 (12 days)	01/29/03 (89 days)	01/29/03 (1 day)
4S	03-07	11/07/02	11/26/02 (19 days)	11/12/02 (5 days)	No Document	12/12/02 (16 days)	01/17/03 (42 days)	01/31/03 (14 days)	01/31/03 (85 days)	02/04/03 (5 days)
		Average	6.3 days	3.3 days		22 days	31.5days	9 days	67 days	3 days

¹ Non-union member.

**DIRECTOR'S CORRESPONDENCE SCHEDULE FOR SUSPENSIONS/REMOVALS
AFTER THE RECEIPT OF FORM 2021 (FY03 – as of 03/31/03)**

1	2	12	13	14	15	16	17	18	19	20	21
No. S/R	ERB Case No.	Oral or Written Reply (15 days) (#12-#11)	Notes to Deciding Official (2 days) (#13-#12)	Notes fm Deciding Official (2 days) (#14-#13)	Douglas Deciding Official (6 days) (#15-#12)	Deciding Official Respond (5 days) (#16-#15)	Draft Letter to Chief (7 days) (#17-#16)	Draft Letter to Director (2 days) (#18-#17)	Review Complete (3 days) (#19-#18)	Final Ltr To Deciding Official (64 days) (#20-#3)	Letter To Employee (65 days) (#21-#3)
1S	03-02	11/13/02 (6 days)	11/19/02 (6 days)	No Document	11/20/02 (7 days)	12/06/02 (16 days)	12/20/02 (14 days)	12/24/02 (4 days)	01/15/03 (22 days)	01/15/03 (99 days)	01/15/03 (99 days)
2S	03-03	01/17/03 (24 days)	02/06/03 (20 days)	No Document	02/14/03 (28 days)	02/25/03 (11 days)	02/25/03 (1 day)	03/27/03 (30 days)	04/03/03 (7 days)	04/03/03 (169 days)	04/07/03 (173 days)
3R	03-05	02/25/03 (27 days)	03/05/03 (8 days)	No Document	03/05/03 (8 days)	03/10/03 (5 days)	04/03/03 (24 days)	04/09/03 (6 days)	04/15/03 (6 days)	04/15/03 (165 days)	04/15/03 (165 days)
4S	03-07	02/13/03 (9 days)	No Document	No Document	02/25/03 (12 days)	03/07/03 (10 days)	03/11/03 (4 days)	03/12/03 (1 day)	04/10/03 (29 days)	04/10/03 (154 days)	04/10/03 (154 days)
		16.5 days	11.3 days		13.8 days	10.5 days	10.8 days	10.3 days	16 days	146.8 days	147.8 days

**DIRECTOR'S CORRESPONDENCE SCHEDULE FOR LETTERS OF WARNING
AFTER THE RECEIPT OF FORM 2021 (FY02)**

1	2	3	4	5	6	7	8	9	10	11
No. S/R	ERB Case No.	Date 2021 Stamped	Date Assigned ERB Specialist	Letter To Union (2 days) (#5 - #3)	Meeting With Empl Supr (5 days) (#6 - #4)	Draft Letter To Chief (15 days) (#7 - #4)	Draft Letter to Director (2 days) (#8 - #7)	Review Completed (8 days) (#9 - #8)	Letter to Proposing Official (25 days) (#10 - #3)	Letter to Employee (30 days) (#11 - #3)
1	02-19	12/19/01	12/28/01 (9 days)	12/27/01 (8 days)	No Document	02/08/02 (42 days)	02/21/02 (13 days)	04/02/02 (40 days)	04/02/02 (104day)	04/04/02 (106 days)
2	02-22	01/29/02	02/05/02 (7 days)	01/30/02 (1 day)	No Document	02/26/02 (21 days)	03/07/03 (9 days)	03/12/02 (5 days)	03/12/02 (41 days)	03/12/02 (41 days)
3	02-23	01/29/02	02/05/02 (7 days)	02/05/02 (7 days)	No Document	No Document	No Document	No Document	04/02/02 (63 days)	04/08/02 (69 days)
4	02-25	02/06/02	02/14/02 (8 days)	02/12/02 (6 days)	No Document	03/17/02 (31 days)	04/02/02 (16 days)	04/04/02 (2 days)	04/04/02 (57 days)	04/05/02 (58 days)
5	02-29	03/14/02	03/26/02 (12 days)	03/25/02 (11 days)	No Document	05/07/02 (42 days)	05/07/02 (1 day)	05/16/02 (9 days)	05/16/02 (63 days)	05/17/02 (64 days)
6	02-30	03/15/02	03/26/02 (11 days)	03/25/02 (10 days)	No Document	04/04/02 (9 days)	04/24/02 (20 days)	05/20/02 (26 days)	05/17/02 (63 days)	05/21/02 (67 days)
7	02-31	03/19/02	03/26/02 (7 days)	N/A ¹	No Document	04/09/02 (14 days)	04/12/02 (3 days)	04/18/02 (6 days)	04/18/02 (30 days)	04/19/02 (31 days)
8	02-37	05/23/02	06/04/02 (12 days)	06/03/02 (11 days)	No Document	06/25/02 (21 days)	06/26/02 (1 day)	07/10/02 (14 days)	07/10/02 (48 days)	07/15/02 (53 days)
9	02-44	07/17/02	07/19/02 (2 days)	07/19/02 (2 days)	No Document	09/04/02 (47 days)	09/09/02 (5 days)	09/19/02 (9 days)	09/18/02 (63 days)	N/A ²
10	02-48	07/26/02	07/29/02 (3 days)	07/29/02 (3 days)	No Document	No Document	No Document	No Document	09/03/02 (39 days)	09/03/02 (39 days)
11	02-50	08/01/02	08/02/02 (1 day)	08/02/02 (1 day)	No Document	08/06/02 (4 days)	08/14/02 (8 days)	08/16/02 (10 days)	08/16/02 (15 days)	08/21/02 (20 days)
12	02-52	08/14/02	08/15/02 (1 day)	08/15/02 (1 day)	No Document	No Document	No Document	No Document	09/19/02 (36 days)	09/19/02 (36 days)
13	02-56	09/11/02	09/13/02 (2 days)	N/A ¹	No Document	10/08/02 (25 days)	10/10/02 (2 days)	10/21/02 (11 days)	10/21/02 (40 days)	10/22/02 (41 days)
14	02-59	09/27/02	10/02/02 (5 days)	N/A ¹	No Document	No Document	No Document	No Document	11/06/02 (40 days)	11/06/02 (40 days)
		Average	6.2 days	5.5 days		25.8 days	7.8 days	13.2 days	50.1 days	53.8 days

¹ Non-union member.

² The employee's supervisor did not give the employee the letter of warning, but instead gave a verbal warning on 09/18/02. That is why there is no date in Column #11.

**DIRECTOR'S CORRESPONDENCE SCHEDULE FOR LETTERS OF WARNING
AFTER THE RECEIPT OF FORM 2021 (FY03 – as of 03/31/03)**

1	2	3	4	5	6	7	8	9	10	11
No. S/R	ERB Case No.	Date 2021 Stamped	Date Assigned ERB Specialist	Letter To Union (2 days) (#5 - #3)	Meeting With Empl Supr (5 days) (#6 - #4)	Draft Letter To Chief (15 days) (#7 - #4)	Draft Letter to Director (2 days) (#8 - #7)	Review Completed (8 days) (#9 - #8)	Letter to Proposing Official (25 days) (#10 - #3)	Letter to Employee (30 days) (#11 - #3)
1	03-00	10/01/02	10/02/02 (1 day)	10/01/02 (1 day)	No Document	11/07/02 (36 days)	01/17/03 (71 days)	01/28/03 (11 days)	01/28/03 (119 days)	01/29/03 (120 days)
2	03-04	10/24/02	10/31/02 (7 days)	10/28/02 (4 days)	No Document	01/16/03 (77 days)	01/17/03 (1 day)	01/28/03 (11 days)	01/28/03 (96 days)	01/30/03 (98 days)
3	03-08	11/27/02	12/16/02 (19 days)	12/12/02 (15 days)	No Document	01/17/03 (32 days)	01/29/03 (12 days)	02/07/03 (9 days)	02/07/03 (72 days)	02/06/03 (71 days) ¹
4	03-09	12/05/02	12/16/02 (11 days)	12/13/02 (8 days)	No Document	No Document	No Document	No Document	01/31/03 (57 days)	N/A ²
5	03-10	12/05/02	12/16/02 (11 days)	12/13/02 (8 days)	No Document	01/27/03 (42 days)	01/30/03 (3 days)	02/03/03 (4 days)	02/03/03 (60 days)	02/04/03 (61 days)
6	03-15	12/11/02	12/18/02 (7 days)	12/17/02 (6 days)	No Document	01/08/03 (21 days)	02/05/03 (28 days)	02/26/03 (21 days)	02/26/03 (77 days)	N/A ³
7	03-17	01/22/03	01/30/03 (8 days)	01/29/03 (7 days)	No Document	02/09/03 (10 days)	02/26/03 (17 days)	04/10/03 (43 days)	04/10/03 (78 days)	04/10/03 (78 days)
		Average	9.1 days	7 days		36.3 days	22 days	16.5 days	79.9 days	85.6 days

¹ The final letter of warning was dated 02/07/03, or a day after the employee received the letter. That is why the dates do not agree in Columns #10 and #11.

² The Form 2021 was returned to the employee's supervisor with a letter recommending a lesser corrective action, so there is no date in Column #11.

³ The employee's supervisor returned the 02/26/03 letter of warning because the employee had not returned to work. ERB mailed another letter of warning on 04/01/03 to the employee, so there is no date in Column #11.

**INVESTIGATION PERIOD OF UPB'S INCIDENT REPORTS
(FY02)**

1	2	3	4	5	6	7	8
No.	Log Case No.	UPB Case No.	Charges	Date Stamped Received	Date Specialist Assigned	Date Memo to Supervisor	Total Days (#7 - #5)
1	02-00	01-249	Fighting, creating disturbance	01/03/02	No IRDS	01/30/02 ¹	27
2	02-03	02-059	Personal conduct	02/26/02	No IRDS	07/24/02 ¹	148 ²
3	02-04	02-221	Parking permit reported loss	07/23/02	07/23/02	08/13/02 ¹	21
4	02-05	02-203	Parking permit reported loss	07/23/02	07/23/02	08/16/02	24
5	02-06	02-205	Parking permit reported loss	07/29/02	No IRDS	08/07/02 ¹	9
6	02-07	02-223	Parking permit reported loss	08/13/02	No IRDS	09/04/02	22
7	02-08	02-260	Alleged sleeping on Post #50	08/13/02	No IRDS	08/28/02	15
8	02-10	02-318	Fighting, creating disturbance	09/30/02	10/01/02	10/25/02 ¹	25
9	02-11	02-325	Fighting, creating disturbance	09/30/02	10/01/02	10/25/02 ¹	25
Average							35.1

¹ Memo incomplete.

² If the 148 days were removed, average time to perform an investigation for the remaining 8 cases was 21 days.

INVESTIGATION PERIOD OF UPB'S INCIDENT REPORTS
(FY03 – as of 01/26/03)

1	2	3	4	5	6	7	8
No.	Log Case No.	UPB Case No.	Charges	Date Stamped Received	Date Specialist Assigned	Date Memo to Supervisor	Total Days (#7 - #5)
1	03-00	02-348	Personal conduct	10/30/02	12/06/02	01/06/03	68
2	03-01	02-386	Abnormal behavior	11/27/02	11/07/02 ¹	11/25/02	
3	03-02	02-204	Alleged assault	11/18/02	11/18/02 ²		
4	03-03	02-398	Personal conduct	01/06/03	01/29/03	02/05/03 ³	30
Aver							49

¹ The Branch Chief began the case on 11/07/02 after receiving a telephone call from the supervisor and a follow up letter on 11/15/02. This was 20 days before receiving UPB's incident report. The first of 3 letters was prepared for the supervisor's signature on 11/25/02 to mail to employee to either return to work or provide medical attention or 18 days after the case was assigned. A second letter was sent on 01/22/03. The ERB specialist was assigned on 02/05/03 and sent the last letter on 02/25/03 informing the employee that proceedings were initiated for removal.

² As of 03/05/03, the Branch Chief has not "...had the opportunity to start the case due to backlog of work because of CFC." The ERB specialist was assigned on 03/06/03, 108 days after receipt of UPB's incident report.

³ Memo incomplete.

MANAGEMENT'S COMMENTS

