

Project Outline:
Revised 25 November 2015

The Ombudsman in Federal Agencies:
Programs and Practices

I. Project Summary

A. **Purpose:** Twenty-five years ago, ACUS' Recommendation 90-2 played a pivotal role in encouraging support for the use of ombuds in the federal government and providing guidance in the establishment and operations of federal ombuds offices. Since that time, the number, prominence and diversity of federal ombuds offices has grown significantly. ACUS' request for further research on The Ombudsman in Federal Agencies provides an exciting opportunity to systematically examine current federal ombuds programs and practices in order to:

1. Better identify and classify the role(s) of ombuds in federal agencies;
2. Develop a set of recommended practices for the establishment and operation of federal agency ombuds offices; and
3. Identify situations where expanded use of ombuds may be beneficial to federal agencies.

B. **Design:** This mixed method research project provides a comparative analysis of ombuds offices within federal agencies. The study includes two parts that complement each other to address a broad scope of descriptive and evaluative questions about federal ombuds' structures, procedures, and activities outlined in the RFP. These parts include:

1. Part 1: Surveying the Field

- a) Identify and document Federal agency ombuds offices primarily from among those Federal executive agencies found on the list of ombuds offices provided by ACUS.¹ The list of offices to be surveyed is not expected to exceed 150.

¹ The list of federal ombuds offices was compiled by ACUS interns who cross-checked it with lists from professional associations and networks (e.g. COFO, USOA, IADRWG, IOA), federal agency reports on ombuds

- b) Conduct a survey of offices on the list referenced above and review documents, literature and legal parameters relevant to Federal ombuds offices.
- c) Review legal literature and case law relevant to the creation and operation of Federal ombuds offices.

2. Part 2: Showcasing Ombuds Programs and Practices

- a) Conduct case studies including identification of best practices
- b) Integrate survey, legal research and case study findings to develop final report and recommendations

C. Results: This study will sketch the landscape of federal ombuds practice and paint more detailed portraits including some promising practices through case studies. The results will help to provide an evidence-based platform to help improve practice, inform policy, build theory, and suggest future research on federal ombuds programs.

II. Research Context

A. **Introduction:** In recent years, ombuds offices² in federal agencies have grown in number, prominence, and diversity of practice (Ginsberg & Kaiser, 2009). This is reflected in the creation and growth of a professional association and several networks, with standards and guidelines for practice, and related legal provisions and requirements.

Researchers' Working Definition: Federal ombuds are agency employees that provide assistance in managing complaints and conflicts involving that federal entity. More specifically, ombuds serve, *inter alia*, as complaint-handlers, dispute resolvers, information resources, communication channels, and as resources who help improve the functioning of their agencies by identifying patterns and trends, surfacing new problems and issues, and recommending changes.

(e.g. Lubbers, 2003; GAO report, 2001), referrals from known federal ombuds programs and relevant experts, and website searches of various unrepresented federal agencies. It will be further crosschecked to verify the accuracy of identification and contact information. Offices that do not have the ombudsman title but whose principal activities are in the nature of ombuds services will be within the scope of this research.

² This outline uses the term *ombuds office* interchangeably with *ombuds program*, *ombuds*, and *ombudsman* to include individuals and offices that serve an ombuds function within a federal entity.

B. Diversity of Programs and Practices: Professionals and scholars (Ginsberg & Kaiser, 2009; Pou, 2011) have noted a wide range of ombuds programs and practices in federal agencies.

“Federal ombudsmen are as variable as the agencies they serve... Adapting ombuds programs to the diverse cultures and organizational missions of different federal agencies has resulted in tremendous inconsistencies in how agencies define and structure the role of ombudsman, how ombudsman officers interpret their role, and how the ombudsman function is viewed and treated by agency leadership.”
(Gadlin & Levine, 2008, p.20)

Differences in ombuds’ offices and activities may also reflect the unique set of circumstances associated with their establishment, their jurisdictions, the types of constituents and issues they address, the scope of their activities, their caseloads, resources available to them, educational background and training, and approaches to complaint and conflict management (Ginsberg & Kaiser, 2009).

However, federal ombuds also share common ground. Many adhere to standards of practice referencing independence, impartiality or neutrality, and confidentiality established by professional associations (e.g. ABA, COFO, IOA, USOA). Most also have the ability to bring urgent or systemic issues to management’s attention and work with other agency offices in providing assistance to the constituents they serve (GAO report, 2001). In addition, many share common goals and values of supporting administrative fairness, accountability and equity (Hyson, 2006).

C. Need for Research: Because of the recent proliferation of federal ombudsmen, little comprehensive information is available about their placement, role, and activities throughout the federal government. Comparative analysis of ombuds practice across federal ombuds offices is even sparser.

D. Research Questions: Fundamental questions remain about the current shape and purposes of federal ombuds practice including:

1. What are the variations in ombuds offices and the scope of their activities focusing primarily on those agencies on the list of ombuds provided by ACUS?

2. What are self-reported successful practices for the establishment, organization, and operation of federal ombuds offices?
3. Where and under what circumstances might expanded use of ombuds be beneficial? (ACUS RFP, 2015)
4. What are some examples of the roles and operations of specialty ombuds?
5. What are the principal legal questions and potential obstacles bearing on ombuds' standards and practice?
6. What might be promising avenues for further research with respect to Federal ombuds?

E. Contributions of this Study: The comparative analysis framework of this research examines similarities and differences across federal ombuds offices. Differentiating program approaches and mapping the variations in current ombuds' practices can provide federal agencies and ombuds with a better understanding of the range and options of ombuds practice. This can enhance appropriate use of existing ombuds offices and encourage the development of more informed efforts. Identifying competing assumptions and practices is also useful in testing the relative effectiveness of different approaches or in exploring the conditions under which each may be most useful. Recognizing differences (and learning of possible innovations) can encourage reflective practice among ombuds as well, which can result in more thoughtful and deliberate approaches.

At the same time, identifying consistencies and common ground among ombuds' programs is essential for providing recommendations for clearer definition and boundaries of practice, establishing core competencies, and identifying criteria for comparative evaluation across programs. Consistencies in practice can promote better accountability, more effective practice, and greater legitimacy and credibility of ombuds offices.

This research will build upon, expand, and update previous research on federal ombudsmen. For example, Leah Meltzer's research on *Federal Workplace Ombuds* (1998) and the GAO's report on *Human Capital* (2001) both used case study methodology to examine workplace ombuds offices that focus on assisting employees within their federal agency to resolve work-related concerns. Anderson & Stockton's (1990) study of *The Ombudsman in Federal Agencies* as well as Ginsberg & Kaiser's (2009) broader study of *Complaint Handling, Ombudsmen, and Advocacy Offices* for CRS both focused on the work of ombuds offices that

handle complaints and concerns about their federal agency from the public or other constituents outside the agency. This study will expand the scope of research to include a range of current practice by persons with the title of ombudsman — including the well-recognized distinctions of ombuds who focus internally or externally—as well as contributing data about currently unclassified variations and specializations. It will provide a research design including a survey that provides a descriptive overview of current programs, and a complementary case study approach that adds detail and evaluative dimensions. Finally, this research will offer current information on the growing and changing role of ombuds in federal agencies.

III. Research Design and Methods

This study provides a comparative analysis of ombuds offices within federal agencies using a mixed method approach that includes both quantitative and qualitative data collection and analysis. It examines questions about definitional issues, agency practices, legal parameters, and best practices as outlined in the ACUS RFP. This research project consists of two parts. They build sequentially and complement each other to address a broad scope of descriptive and evaluative questions about federal ombuds structure, procedures, and activities. We believe that structuring the project this way will provide the strongest results and an effective means of achieving the research goals set forth by ACUS.

A. Part 1: Surveying the Field

1) Identification and Documentation of Federal Agency Ombuds Programs and Review of Literature - Ombuds offices, including offices made up of a single ombudsman, will be the unit of analysis in this study rather than individuals or larger complaint handling or conflict management services within federal agencies. Ombuds offices will be defined as consisting of or led by a federal employee with the job title of ombudsman. This study will include offices representative of the broad range of ombuds practice and activities in use under that title in the offices on the above list. Other federal agency offices that may offer occasional ombuds services or other complaint handling or conflict management functions will not be included in the study, but may be noted where significant. It will also include offices that do not have the word “ombudsman” (or a variant) in their titles, but whose principal activities are in the nature of ombuds services, (*e.g.*, the National Archives’ Office of Government Information Services and the Internal Revenue Service’s Office of the National Taxpayer Advocate.)

Private sector ombuds services that may be contracted for by federal agencies will also not be included, but may be noted where identified. The research team, in consultation with ACUS, will make final decisions about criteria for inclusion in the study and any special cases.

Part 1 of the research will also gather and review literature relevant to federal ombuds programs. These materials include: 1) professional standards and guidelines from ombuds associations and networks such as the ABA, COFO, IOA, USOA; 2) legal protections and requirements as well as federal or agency policy and case law affecting ombuds practice (*e.g.* ADR Act, FOIA); 3) relevant evaluation research on public sector ombudsmen (*e.g.* GAO report (2001); Ginsberg & Kaiser (2008); Fowlie, 2008); and 4) related research and theory on ombudsmen. The professional and legal documents will serve as a reference in the analysis of data collected throughout the study. Further, the review of related research and theory will help situate this inquiry within existing literature at least as it pertains to the Federal sector, inform the development of the survey instruments and interviews, and provide a platform upon which this study can help strengthen practice, inform policy, build theory, and guide future research.

2) Survey and Documents Review of Federal Ombuds Programs- The second step in Part 1 of the study will utilize a comprehensive survey methodology across identified federal ombuds offices to examine general information, definitional issues, agency practices, legal parameters, and self-reported promising practices. Both quantitative and qualitative data will be collected through an online survey, optional telephone support and a review of available ombuds office materials. In compliance with the Paperwork Reduction Act, non-government employees will not be included in any structured surveys.

- a. **Instruments:** The research team will design the online survey based on the areas of investigation outlined above.
 - i. The Institutional Review Boards at Kennesaw State University and Nova Southeastern University will approve all instruments for use with human subjects in consultation with ACUS. Instruments will contain a proper review of ethical and procedural protocols related to the conduct of the study.
 - ii. All instruments will be pilot tested on a small group of experts who are familiar with federal ombuds practice. The pilot test will be used to evaluate the construction of the instruments, including question clarity, phrasing, and sequencing of questions, as well as the length and format of the surveys. The instruments will be refined, revised, and re-tested as needed prior to being used in the study.
- b. **Data Collection:** The research team will request ACUS' support in sending out a letter of introduction and request for participation to all ombuds offices in the study. Our survey will be sent out to all heads of federal ombuds offices identified in footnote 1. In addition, researchers will collect any relevant informational materials (e.g. promotional materials, websites & internet-based resources, annual reports, program evaluations or client satisfaction surveys, publications, etc.) that ombuds offices are willing to make available.
- c. **Data Analysis:** The qualitative and quantitative data from the survey and review of documents will be analyzed. Analysis of responses will provide aggregate data that sketch the broader shape and development of federal ombuds procedures and practice.

- i. Analysis of quantitative data will primarily be descriptive. Data analysis will be performed with the use of IBM SPSS v.22 software.
- d. **Results:** The collection of data across federal ombuds offices will help provide descriptive information about the variation, convergences and divergences of programs and practices. It will also describe ombuds' self-assessments of their value to agencies and of their most effective practices. The results from Part 1 can lay a foundation for better understanding circumstances under which agencies would benefit most from using ombuds, and is critical in identifying potential cases for Part 2 of the study.

B. Part 2: Showcasing Ombuds Programs and Practices

1) Case Studies of Current Ombuds Offices

While Part 1 will provide aggregate information about the range, variations and convergences across federal ombuds offices, the case studies in Part 2 can offer a more detailed and nuanced analysis of some effective ombuds' procedures and activities.

- a. **Case Selection:** Between four and six ombuds programs will be selected to showcase promising practices and illustrate differences within current practice. These descriptive case studies will be necessarily dependent on the consent of the ombuds offices and the extent to which they are willing to share information. They will build upon and complement findings from Part 1. Case selection will be based on:
 - i. Specific ombuds programs or practices identified by peers in Part 1 as positive 'models';
 - ii. Ombuds identified in Part 1 by researchers as utilizing innovative or effective practices (e.g. based on findings from Part 1 analyses or as described in relevant literature);
 - iii. Ombuds offices that demonstrate meaningful differences and illustrate important variations in practice; and
 - iv. Ombuds willing to participate as a case study.
- b. **Case Study Methodology:** The researchers will seek the opportunity to interview agency organizational leaders, other ombuds office staff, and

offices that ombuds frequently work with at case study sites. By including the perspective of multiple stakeholders involved in federal ombuds practice, Part 2 may offer a better picture of the value ombuds bring to agencies and the activities that have improved agency dispute resolution and program functions. It can also provide a variety of perspectives on appropriate criteria and benchmarks for measuring ombuds effectiveness and impact. The case studies can help begin answering the more evaluative questions in this research as well as provide a deeper understanding of the challenges and opportunities in federal ombuds work.

- c. **Case Study Results:** The case studies in Part 2 will not provide independent evaluations of program impact or make judgments about the relative effectiveness of different approaches. Instead, they will take the form of a descriptive and analytic pre-evaluation (Patton, 2011) that identifies criteria and establishes a framework for future individual and comparative assessments. If programs have conducted their own evaluations and are willing to make those results available, they will be included, in whole or in part, in the case studies.

The case studies are also important in illustrating the ways in which variation in ombuds programs and practices affect, and are affected by, federal agency contexts. Part 2 of the study will examine the complex conditions and the principal factors that shape current ombuds offices. It can further explore factors shaping the differences and consistencies among ombuds identified in Part 1 of the research. In addition, these case studies will provide context-specific information critical in developing guidelines and recommendations for establishing, re-designing, or expanding ombuds offices.

While the aggregate data from Part 1 can provide useful information about broader patterns and trends in current ombuds work, the case studies may offer powerful examples, or stories, of success. They can serve as useful models for agency leaders, federal ombudsmen, and others interested in developing ombuds offices.

A. Research Ethics, Verification, and Delimitations

- 1) **Confidentiality:** Given that confidentiality is a critical dimension of ombuds work and with the objective of encouraging participation and candor, we would like to be able to offer a choice of one or more levels of confidentiality to survey and

interview participants that desire it. We recognize that a number of practical and legal issues would be raised by such an offer pertaining to collection, use, attribution and preservation of the data gathered. We will seek guidance from ACUS legal staff on several options and mutually defined limitations, if any, for offering confidentiality within existing law and consistent with the terms of the research consultant's contract with ACUS.

- 2) **IRB Approval:** All research activities in this project (in Part 1 as well as Part 2) will be approved by the relevant Institutional Review Boards at either or both Kennesaw State University and Nova Southeastern University and will adhere to ethical principles underlying the acceptable conduct of research involving human subjects.
- 3) **Verification:** Triangulation of data sources, collection methods, and analytical tools will help make this research design robust. However, a number of limitations must also be noted. Constraints on time, budget, and staffing for this research limit the ability of this study to move beyond self-reports in Part 1. In addition, participation in the study will be voluntary, so there will inevitably be issues of self-selection, and unknown response rates may further impact the validity of aggregate findings.
- 4) **Delimitations:** In addition, this study does not undertake any independent evaluation of ombuds offices effectiveness or impact, or provide a meta-analysis of existing program evaluations. Issues of ombuds effectiveness and impact are, perhaps, the most interesting and also the most difficult to assess. Such evaluations are important in demonstrating ombuds' value such as improving government systems, ensuring service standards, enhancing agency reputation, increasing workplace and customer satisfaction, promoting bystander intervention in unacceptable behavior, and cost savings. The challenges to conducting meaningful ombuds evaluation without violating confidentiality or independence have been discussed widely by professionals and scholars (Rowe, 2010; Fowlie, 2008).

By seeking convergent and divergent assessment criteria across ombuds programs, this study may suggest a foundation for independent evaluations in and across agencies. This would be a valuable next step in research. Further, this study is designed to gather information from ombudsmen to be able to broadly discuss perceptions of their value within federal agencies, identify promising practices,

and make recommendations that may strengthen federal ombuds offices and suggest avenues for further research.

IV. Timeline of tasks, Research Reports and Recommendations

The research project will result in two draft reports and a final Summary Report that includes recommendations. Work progress will be demarcated as follows:

- A. Background information and context setting, and finalization of survey instrument – December 18, 2015**
- B. Distribution of on-line survey—on or before January 15, 2016.**
- C. Preliminary outline of issues presented by inconsistent nomenclature, multiple professional standards and evolving legal context. – January 19, 2016.**
- D. Optional telephone calls for requests for assistance on survey. —January - February, 2016**
- E. Data analysis from the surveys—completed by April 15, 2016**
- F. Site selection for case studies and commencement of interviews—May, 2016**
- G. Draft Survey Research Report – July 15, 2016**

The survey research draft report will present preliminary findings from the survey portion of the study (Part 1). It will include the following sections:

- 1) **Introduction** – including a statement of the need for research, goals and objectives of the study and overview of research questions
- 2) **Literature Review** – including a review and discussion of: issues specific to federal ombudsmen, past research reports and findings, comparison of current definitions and standards, and legal provisions affecting federal ombuds programs and practices
- 3) **Research Methodology** – including research design, operationalization of terms, units of analysis, selection of participants, instruments, verification, and data collection and analysis procedures
- 4) **Presentation of Data and Data Analysis**– including description of participants and highlights of the most important findings. These may include:

- a. *General information* about ombuds offices such as when, how and why they were established; their jurisdictions; relevant statutory and regulatory provisions; population served; number of staff; reporting structure, and annual caseload;
 - b. *Definitional issues*, variations in definitions of ombudsmen, standards of practice in use, and ways in which standards such as independence, impartiality, and confidentiality are specified.
 - c. *Ombuds practice* including the range, variation, and prevalence of ombuds services provided and issues addressed;
 - d. *Legal and policy provisions* affecting ombuds work and the impact of those legal and policy provisions, including the ADR Act and FOIA, on their confidentiality and recordkeeping; the adequacy of legal protections for ombuds confidentiality, independence and impartiality; access to independent counsel, and other legal or policy issues that impact ombuds work including budgetary and classification concerns;
 - e. *Ombuds self-evaluations* or assessments of types of issues and situations which have the best (and worst) results, activities they consider most valuable to constituents, the value they bring to federal agencies, their effectiveness and impact;
 - f. *Best practices* including ombuds' opinions about the best criteria for measuring effective practice/ success, agencies' effective use of ombuds services, structure and reporting issues that promote effective practice, situations under which agencies should establish or expand ombuds offices, other federal ombuds that are good models and/ or have promising practices;
- 5) **Discussion of Findings** – including interpretation of findings, connection of findings to existing literature and policies, preliminary thoughts on implications for practice and policy recommendations, and limitations of the study
 - 6) **Conclusions** – including a summary of the most important findings and next steps in research

H. Draft Case Study Report and Draft Summary Report –September 9, 2016

- 1) **The draft case study report** will present preliminary findings from the case study portion of the research (Part 2). This report will include the following sections:
 - a. **Introduction**
 - b. **Case Studies overview** – including selection of cases, data collection and analysis methodology, and general structure of case studies
 - c. **Case Studies** – including the results and discussion of findings for each case study. Some of the information explored in these cases may include:
 - i. The ways in which variation in ombuds office structures, functions, procedures and activities affect (and are affected by) federal agency contexts;
 - ii. Opinions by multiple federal stakeholders, and perhaps a few non-federal stakeholders, in compliance with the Paperwork Reduction Act, about the value of ombuds offices and their most effective programs and practices;
 - iii. Descriptions of how programs and/ or promising practices have contributed to the effectiveness of ombuds offices
 - d. **Discussions of cumulative case study findings** - including summary of best practices from case studies and implications for practice and policy recommendations.

- 2) **The Draft Summary Report** will integrate and summarize findings and discussions, and will include a set of proposed recommendations based on legal research, the draft survey report and the draft case study report. The structure will include sections similar to the draft survey report: introduction, literature review, research methodology of the study as a whole, summary of findings from Part 1 and Part 2, and integrated discussion of findings and best practices. The draft summary report will also compare current federal ombuds programs and practice with

Conference Recommendation 90-2, and focus on developing new or updated recommendations.

I. Final Summary Report and Recommendations – October 24, 2016

The research team will revise and refine the draft summary report and the recommendations based on reviews and discussions with the Conference staff, Chairman, and Committee membership. A final summary report and recommendations will be submitted by October 24, 2016. The team will work with ACUS staff and committee as needed to revise recommendations until they are approved by the Committee and ready to be forwarded to the Council.

J. Attend ACUS Plenary Session – December, 2016

V. Conclusion

The Administrative Conference’s Recommendation 90-2 was pivotal in encouraging and guiding the creation of ombuds offices within the federal government. The present research project will examine the current shape and development of federal ombuds programs and practices, better classify and define the role of federal ombuds, develop a set of some recommended practices for the establishment and operation of federal agency ombuds offices, and identify circumstances under which expanded use of ombuds may be beneficial to federal agencies.

The research project will provide a systematic, empirical, comparative analysis of current federal ombuds offices. It will sketch the landscape of federal ombuds practice through survey methodology and paint more detailed portraits of practice through case studies. The findings can help identify promising practices and be useful in providing agency leadership with guidance in creating or redesigning ombuds offices for greater success. The results can help build an evidence-based platform to improve practice, inform policy, build theory, and plan future research on federal ombuds programs.

Respectfully submitted,

The chiResolutions Federal Ombuds Research Team:

Carole Houk, Mary Rowe, Deborah Katz, Neil Katz, Lauren Marx, Timothy Hedeon

Appendix A: Table of Abbreviations

ABA	American Bar Association
ACUS	Administrative Conference of the United States
ADR	Alternative Dispute Resolution
CHI	Carole Houk International
COA	Corporate Ombudsman Association
COFO	Coalition of Federal Ombudsman
CRS	Congressional Research Service
DOD	Department of Defense
FDIC	Federal Deposit Insurance Corporation
EEO	Equal Employment Opportunity
FOIA	Freedom of Information Act
GAO	General Accounting Office
IADRWG	Interagency Alternative Dispute Resolution Working Group
ICMS	Integrated Conflict Management System
IOA	International Ombudsman Association
IRS	Internal Revenue Service
RFP	Request for Proposal
TOA	The Ombudsman Association
UCOA	University and College Ombuds Association
USOA	United States Ombudsman Association

Appendix B: References

- American Bar Association (2004). *Standards for the Establishment and Operation of Ombuds Offices*. ABA: Washington, D.C.
- Anderson, D. & Stockton, D. (1990). *The Ombudsman in Federal Agencies: The Theory and The Practice*. ACUS 105: Washington, D.C.
- Fowlie, F. (2008). *Blueprint for the Evaluation of an Ombudsman's Office: A Case Study of the ICANN Office of the Ombudsman*. Doctoral Dissertation. La Trobe University, Australia.
- Gadlin, H. & Levine, S. (2008, Spring). *Stranger in a Strange World: The Ombudsman in the Federal Government*. ACResolution. Association for Conflict Resolution.
- Ginsberg, W. & Kaiser, F. (2009). *Federal Complaint-Handling, Ombudsman, and Advocacy Offices*. CRS Report for Congress RL34606. Congressional Research Service: Washington, DC.
- Administrative Conference of the United States, Office of the Chairman (1991). *The Ombudsman: A Primer for Federal Agencies*. Resource Papers in Administrative Law, ACUS: Washington, DC.
- Administrative Conference of the United States (1993). *The Ombudsman in Federal Agencies, Administrative Conference of the United States Recommendations 90-2, 1C.F.R. 305.90-2*. ACUS: Washington, DC.
- Administrative Conference of the United States (2015). *Request for Proposal: The Ombudsman in Federal Agencies*. ACUS: Washington, DC.
- Hyson, S. (2006). *Ombudsman Research Project*. Notes from Annual Meeting of the Canadian Political Science Association, York University: Toronto, Ontario.
- Lubbers, J. (2003). *Independent Advocacy Agencies with Agencies: A Survey of Federal Agency External Ombudsmen*. Report to the National Taxpayers Advocate. Internal Revenue Service: Washington, DC.
- Patton, M. Q. (2012). *The Essentials of Utilization-Focused Evaluation*. Sage Publications: Thousand Oaks, CA.
- Pou, C. (2011). *Federal Conflict Management since 1995 and Options for the Administrative Conference*.

- Rowe, M. & Hicks, W. (2004). The Organizational Ombuds. *Research Book for Managing Employment Disputes*, CPR Institute for Dispute Resolution, Inc., New York: NY.
- Rowe, M., & Gadlin, H. (2014). The Organizational Ombudsman. In Howard, W., Teague, P., & Colvin, A (Eds.) *The Oxford Handbook of Conflict Management in Organizations*. Oxford University Press: Oxford.
- Rowe, M. (2010, Winter). Identifying and Communicating the Usefulness of Organizational Ombuds, With Ideas about OO Effectiveness and Cost-Effectiveness, *Journal of the International Ombudsman Association*, 3(1).
- Strauss, A. & Corbin, J. (1990). *Basics of Qualitative Research: Grounded Theory Procedures and Techniques*. Sage Publications: Newbury Park, CA.
- Meltzer, L. (1998). Federal Workplace Ombuds. *Ohio State Journal of Dispute Resolution*, 13(2). 549-609.
- United States General Accounting Office (2001, April). *Human Capital: The Role of Ombudsmen in Dispute Resolution*. Report to the Ranking Member, Subcommittee on International Security, Proliferation, and Federal Services, Committee on Government Affairs, U.S. Senate. GAO-01-466. Washington, D.C.