

U.S. Postal Service Emergency Preparedness: Winter Storm Elliott

AUDIT REPORT

Report Number 23-094-R24 | March 12, 2024



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Highlights

Background

The U.S. Postal Service provides customers across the nation mail service six days a week as required by law. In December 2022, Winter Storm Elliott arrived in Western New York, and within minutes, winds went from 10 to 70 miles per hour and brought about 36 inches of snow over four days. During a winter storm emergency that may disrupt normal operations, the Postal Service may continue its mission of delivering services to the American public or decide to close facilities and cease operations. It is vital for the Postal Service to prepare for and respond to winter emergencies in a timely manner to safeguard employees. Additionally, it is critical for the Postal Service to capture lessons learned and address potential preparedness and response weaknesses following a weather emergency.

What We Did

This report responded to a congressional inquiry. Our objective was to review the U.S. Postal Service's actions before, during, and after Winter Storm Elliott. We interviewed employees, supervisors, managers, and officials involved in the emergency event, and reviewed internal policies and procedures around weather emergencies. We also visited Williamsville and West Side delivery units in Buffalo, NY, referenced in the congressional inquiry, to assess management's actions throughout Winter Storm Elliott.

What We Found

The Postal Service did not fully comply with emergency preparedness and response procedures before, during, or after Winter Storm Elliott. Specifically, at the Williamsville delivery unit, district management did not ensure the manager was fully prepared to safeguard employees before Winter Storm Elliott arrived. Additionally, although management maintained accountability of employees during the storm, Williamsville and West Side employees were placed at risk when district management did not take immediate action when conditions became life threatening, to include releasing them in a timely manner. Lastly, district management did not complete a timely final assessment to identify and document lessons learned and address areas for improvement.

Recommendations

We recommended management update emergency preparedness policy to establish timelines for communicating preparedness information and outlining supplies needed to safeguard employees; reiterate responsibilities with district management and direct the Buffalo postmaster to take immediate action to close facilities when situations become life threatening during a winter weather emergency; update policy to specify responsibilities and timeframes to complete a formal after-action report; and develop a process to verify after-action reports include lessons learned and incorporate the lessons learned from Winter Storm Elliott regarding essential emergency supplies into the winter weather guidance.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

March 12, 2024

MEMORANDUM FOR: JUDY A. DE TOROK
VICE PRESIDENT, CORPORATE AFFAIRS

SCOTT P. RAYMOND
VICE PRESIDENT, RETAIL AND DELIVERY
OPERATIONS, ATLANTIC AREA

A handwritten signature in black ink, reading "W Espinoza", is centered on the page.

FROM: Wilvia Espinoza
Deputy Assistant Inspector General
for Inspection Service, Technology, and Services

SUBJECT: Audit Report – U.S. Postal Service Emergency Preparedness: Winter
Storm Elliott (Report Number 23-094-R24)

This report presents the results of our audit of U.S. Postal Service Emergency Preparedness of Winter Storm Elliott.

We appreciate the cooperation and courtesies provided by your staff. If you have questions or need additional information, please contact Victoria Dixon, Director, Inspection Service, or me at 703-248-2100.

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction/Objective

This report responds to a congressional inquiry to the Inspector General¹ from U.S. Senators Kirsten Gillibrand (D-New York) and Charles Schumer (D-New York), and U.S. Congressman Brian Higgins (D-New York) to review U.S. Postal Service management's actions for Winter Storm Elliott (Project Number 23-094). Our objective was to review the Postal Service's actions before, during, and after Winter Storm Elliott. See [Appendix A](#) for additional information about this audit.

Background

The Postal Service provides mail service to residences six days a week as part of its universal service obligation. While mail and package delivery is especially critical to residents who receive medications, financial documents, and packages, the Postal Service must also comply with safety laws and regulations to provide its employees with a safe and healthy work environment. During a winter storm emergency that may disrupt normal operations, the Postal Service may continue its mission of delivering services to the American public or decide to close facilities and cease operations. It is vital for the Postal Service to prepare for and respond to winter emergencies in a timely manner to safeguard employees. Additionally, it is critical for the Postal Service to capture lessons learned and address potential preparedness and response weaknesses following a weather emergency.

Winter Storm Elliott

On December 20, 2022, the National Weather Service in Buffalo, NY, warned residents of the potential for heavy lake effect snow accumulating up to three feet, hurricane-force winds with gusts up to 70 miles per hour, and flash freeze conditions. Over the next

two days, warnings became more serious and as predicted, temperatures plummeted, rain changed to snow, and blizzard conditions set in across Buffalo.

Winter Storm Elliott arrived in Western New York on December 23, 2022, and lasted four days. *The New York Times* reported that within minutes, the winds that morning went from 10 to 70 miles per hour. Additionally, the Buffalo region received about 36 inches of snow over four days.² Local Postal Service management stated that, on December 22, 2022, the day before the storm began, they made the decision to divert a portion of mail from the Buffalo Processing and Distribution Center (P&DC) to other

mail processing facilities to avoid processing delays.

On January 29, 2023, a news article reported mismanagement by Postal Service managers at the Williamsville delivery unit in Buffalo during Winter Storm Elliott. According to the article, managers ignored warnings about the storm and, after debating for hours, ordered employees to vacate the facility and drive home in what had become extremely dangerous conditions. The article alleged that dozens of workers, including a woman eight months pregnant, were ordered to leave the facility

or face arrest. The article further alleged the pregnant employee attempted to drive home but got stuck in a snowbank and had to be rescued by volunteer firefighters.³

In April 2023, the U.S. Postal Service Office of Inspector General (OIG) received a congressional inquiry to address concerns related to Postal Service

“While other Postal Service facilities in Buffalo were impacted by Winter Storm Elliott, we focused our fieldwork on the Williamsville and West Side delivery units identified in the congressional inquiry.”

¹ The congressional inquiry was also addressed to the postmaster general. We discuss the Postal Service's response to the inquiry later in this report.

² *The New York Times, How the Buffalo Blizzard Became So Deadly*, December 29, 2022.

³ *The Buffalo News, Postal Service Managers Accused of Endangering Workers During Buffalo Blizzard*, January 29, 2023.

preparedness and response actions for Winter Storm Elliott at the Williamsville delivery unit (see Findings 1, 2, and 3). Further, the inquiry expressed concerns regarding Postal Service management decisions during Winter Storm Elliott at the West Side delivery unit (see Finding 2). While other Postal Service facilities in Buffalo were impacted by Winter Storm Elliott, we focused our fieldwork on the Williamsville and West Side delivery units identified in the congressional inquiry.

Postal Service Emergency Preparedness

The Postal Service’s Office of Continuity and Preparedness provides direction and oversight for the continuity of postal operations and integrated emergency management planning nationwide. Postal Service management develops integrated emergency management plans (IEMPs) for each facility, which are then used to prepare for and respond to emergencies that occur. Additionally, the Office of National Preparedness, which reports to the Office of Continuity and Preparedness, identifies and issues national preparedness programs, policies, and tools to field personnel and monitors field compliance with emergency management policies. Further, the Office of National Preparedness manages emergency preparedness specialists at area and district levels to implement emergency management programs. They work with emergency management teams (EMTs) to prepare for and respond to emergencies in their respective areas and districts. Area vice presidents and district managers assume the role of emergency manager at their respective levels.⁴ For district and facility emergency preparedness, the Buffalo postmaster within the district serves as the liaison between the New York 3 District EMT and delivery unit management. See Figure 1 for the reporting structure of the Atlantic Area, New York 3 District, and Buffalo, NY, management.

Figure 1. Organizational Reporting Structure of the Atlantic Area, New York 3 District, and Buffalo, NY



Source: Postal Service and OIG analysis.

Findings Summary

The Postal Service did not fully comply with emergency preparedness and response procedures before, during, or after Winter Storm Elliott. Specifically, at the Williamsville delivery unit, New York 3 district management did not ensure the manager of the unit was fully prepared to safeguard employees before Winter Storm Elliott arrived. Additionally, although they maintained accountability of all Williamsville and West Side delivery unit employees prior to and throughout the storm, district management placed employees at risk when they did not enact immediate response actions when storm conditions became life threatening, to include releasing them in a timely manner. Lastly, management in the New York 3 District did not complete a timely final assessment to identify and document lessons learned and address areas for improvement to better prepare for future winter storms.

⁴ Management Instruction AS-280-2021-7, *Integrated Emergency Management Supporting Field Business Continuity*, November 2021.

Finding #1: Planning and Preparing for Winter Storm Elliott

The New York 3 district manager and Buffalo postmaster did not fully prepare unit management at the Williamsville delivery unit to safeguard employees during Winter Storm Elliott in accordance with policy.

Postal Service policy states that district and delivery unit management should adequately prepare for emergency situations to protect employees.

District management, including postmasters, are responsible for the coordination of preparedness and response activities throughout the district to prepare for the winter season. Postmasters should coordinate with delivery unit managers and supervisors to ensure delivery unit employees are prepared for winter storms.⁵

To prepare for the winter season, the district emergency preparedness specialist sent the fiscal year (FY) 2023 Atlantic Area Winter Weather Readiness Toolkit (Toolkit) to the New York 3 District Manager on November 15, 2022. Although the Toolkit was not required by Postal Service policy, it contained emergency planning procedures to help postmasters and delivery unit management safeguard employees during a winter storm emergency. Specifically, the Toolkit stated management should monitor weather conditions for winter storm warnings and listed supplies, such as flashlights, blankets, drinking water, and nonperishable food, that should be set aside for emergency use.

However, the district manager did not communicate preparedness guidance in a timely manner, and the postmaster did not provide the guidance to Williamsville delivery unit management. Specifically, the district manager did not forward the Toolkit to the postmaster to share with Williamsville delivery unit management until December 22, 2022, 37 days after initially receiving the preparedness guidance. The postmaster stated they received the Toolkit on

December 22, 2022, one day before Winter Storm Elliott began, but did not recall forwarding it to or following up with the delivery unit manager to ensure they received and understood their responsibilities to prepare and safeguard employees if a storm occurred. As of October 31, 2023, the Williamsville manager stated they did not recall receiving the Toolkit, which could have been helpful to identify the resources to prepare for emergency situations and protect employees.

“District management, including postmasters, are responsible for the coordination of preparedness and response activities throughout the district to prepare for the winter season.”

District management and the Williamsville delivery unit manager did not discuss plans to cease delivery operations prior to Winter Storm Elliott. Specifically, on December 22, 2022, the postmaster met with the Williamsville delivery unit manager to discuss continuing delivery operations despite the impending winter storm. At the meeting, they decided that since the storm was forecasted to arrive around 2 p.m. on December 23, 2022,

22 of 57 carriers would deliver packages from 6 a.m. to 9 a.m. and then return to the office where Williamsville management would reassess weather conditions to see if carriers could continue to deliver the mail. However, management did not have a plan if the weather conditions did not improve.

The district manager and the postmaster were unable to explain why they did not fully prepare the Williamsville delivery unit manager for Winter Storm Elliott. Additionally, Postal Service policy identifies the roles of personnel responsible for emergency preparedness; however, there is no guidance that clarifies how district and facility management should prepare for weather emergencies or provides timelines for when emergency preparedness guidance should be distributed for implementation. The Toolkit, if implemented and communicated timely, could assist postal employees in preparing for winter weather emergencies.

⁵ Management Instruction AS-280-2021-7.

When the Williamsville supervisor and eight employees had to shelter at the delivery unit for two nights, they did not have necessary supplies such as blankets and nonperishable food set aside for emergency use. Further, with nothing but water on hand at the delivery unit, a few employees had to shovel snow and brave blizzard conditions to retrieve food from the grocery store nearby on December 23 and December 24, 2022. See Figure 2.

Figure 2. Williamsville Employees Heading to Grocery Store



Source: Picture taken by a Postal Service employee on December 24, 2022, at 5:24 p.m.

It is crucial for district management to provide timely emergency preparedness guidance to delivery unit management to ensure they have the supplies and resources needed to safeguard employees during a winter weather emergency.

Recommendation #1

We recommend the **Vice President, Corporate Affairs**, update Management Instruction AS-280-2021-7 to instruct district management to 1) establish appropriate timelines for communicating preparedness information to postmasters and managers in preparation for a winter weather emergency and 2) outline supplies needed at Postal Service facilities to safeguard employees.

“It is crucial for district management to provide timely emergency preparedness guidance to delivery unit management to ensure they have the supplies and resources needed to safeguard employees during a winter weather emergency.”

Finding #2: Facility Closure Procedures During Winter Storm Elliott

Although New York 3 District management maintained accountability of all Williamsville and West Side delivery unit employees prior to and throughout the storm, New York 3 District management and the Buffalo postmaster placed the employees at risk when they did not immediately release them once Winter Storm Elliott weather conditions worsened, in accordance with existing Postal Service policy and guidance.

Postal Service policy authorizes the postmaster to grant administrative leave for up to one day without district management approval during weather emergencies.⁶ Further, Postal Service guidance states district management must take immediate action when storm conditions become life threatening. Specifically, the guidance requires management to issue facility closure instructions to managers of facilities at risk of severe winter weather.⁷

Although the postmaster could have exercised their authority to grant administrative leave for up to one day for the Williamsville delivery unit, they waited for over three hours for district management to make the decision to cease operations on December 23, 2022. On this day, 22 carriers delivered packages from 6 a.m. to 9 a.m., and 46 carriers were out delivering mail at 9:30 a.m., when storm conditions significantly changed. At 9:30 a.m., local government officials issued a county-wide travel ban prompting

⁶ *Employee and Labor Relations Manual*, Issue 53, Section 519, Administrative Leave, dated September 2022.

⁷ District EMT Winter Storm Emergency Response Checklist 2022.

“Postal Service policy authorizes the postmaster to grant administrative leave for up to one day without district management approval during weather emergencies.”

Williamsville delivery unit management to instruct the carriers⁸ to immediately return to the delivery unit. Due to road conditions, the last carrier returned to the delivery unit at about 10:30 a.m. At 11:00 a.m., Williamsville delivery unit management advised employees they could take annual or sick leave,⁹ in accordance with Postal Service policy.¹⁰ Forty-two of 75 (56 percent) employees used their leave, but for various reasons, 24 remained and waited for district management to grant administrative leave.¹¹ For example, one employee with a low leave balance waited for administrative leave to be granted before leaving the facility. At about 12:30 p.m., the customer service operations manager, acting for the postmaster, called the district manager requesting the closure of the Buffalo delivery units, including Williamsville and West Side, when weather conditions became severe with zero visibility and white-out conditions. Around 1 p.m., the district manager authorized facility closure instructions and approved administrative leave.

Similarly, the West Side delivery unit manager informed employees about the leave request process, as required by Postal Service policy.¹² Some West Side employees completed leave request forms and went home, while eight of 36 remained until the facility closure was approved and administrative leave was granted at 1 p.m. by the district manager.

The district manager could not explain why it took over three hours from the time the county-wide travel ban was initiated to authorize facility closures and administrative leave. Although Postal Service policy allows the postmaster to grant one day of administrative leave, the district manager stated they expected the postmaster to get their approval before closing facilities and granting administrative leave.

The lack of a timely decision resulted in three Williamsville delivery unit carriers becoming immobilized on the road while driving home due to hazardous weather conditions, including one who was eight months pregnant. The pregnant carrier along with another carrier were rescued by the local fire department and taken to shelters. The third carrier stayed at the home of a local resident who rescued them. Additionally, eight employees and a supervisor sheltered at the delivery unit, sleeping on chairs or cardboard pallets (see Figure 3 and Figure 4).

Figure 3. Employees Sheltering at the Williamsville Delivery Unit



Source: Picture taken by a Postal Service employee on December 24, 2022, at 8:34 a.m.

⁸ Williamsville delivery unit had 52 carriers out delivering on December 23, 2022.

⁹ During our visit, we determined the employees were not ordered to leave the Williamsville delivery unit or face arrest, as alleged in *The Buffalo News* article, dated January 29, 2023.

¹⁰ *Employee and Labor Relations Manual*, Issue 53, Section 510, Leave, dated September 2022.

¹¹ Nine other Williamsville delivery unit employees had already ended their workday prior to 1 p.m. on December 23, 2022.

¹² *Employee and Labor Relations Manual*, Issue 53, Section 510, Leave, dated September 2022.

Figure 4. Cardboard Pallet Used as a Bed



Source: Picture taken by a Postal Service employee on December 23, 2022, at 9:53 p.m.

Lastly, early Christmas morning, employees shoveled for five hours beginning at 4 a.m. to create a driving path so everyone could get home (see Figure 5).

Figure 5. Williamsville Employees Shoveling a Path



Source: Picture taken by a Postal Service employee on December 25, 2022, at 6:51 a.m.

The West Side delivery unit manager stated that West Side did not receive the same heavy snow as the Williamsville delivery unit and all employees made it home safely, despite the late authorization. Although the West Side employees did not experience the same adverse effects as the Williamsville employees, it is important for district management and the Buffalo postmaster to understand their responsibilities to make decisions and promptly communicate direction to safeguard employees during weather emergencies. We believe that if

Postal Service management had followed the nationwide policy to close the Williamsville delivery unit when Winter Storm Elliott reached life threatening conditions, the adverse impacts to employees would likely have decreased.

Recommendation #2

We recommend the **Vice President, Retail and Delivery Operations, Atlantic Area**, reiterate authorities and responsibilities with district management and direct the Buffalo postmaster to take immediate action to close facilities when situations become life threatening during a winter weather emergency in accordance with existing policy and guidance.

Finding #3: Reporting Actions After Winter Storm Elliott

Management in the New York 3 District did not timely document lessons learned and address areas for improvement for the Buffalo delivery units, most notably the Williamsville delivery unit, following Winter Storm Elliott, as required by policy.

Postal Service policy¹³ requires leadership at all levels of the organization to demonstrate a commitment to the integrated emergency management concept by adhering to policies, using guides and plans, and proactively correcting deficiencies. Further, the policy states that an emergency response checklist must be included as part of an IEMP.¹⁴

The New York 3 District IEMP states the district manager is responsible for coordinating an after-action meeting to determine if plans, procedures, or contacts need to be updated or changed for delivery units. Further, the IEMP states the district manager should capture recommendations in a final after-action report,¹⁵ although Postal Service guidance does not provide timeframes for when after-action reports should be completed. Additionally, Postal Service policy¹⁶ requires the Office of National Preparedness to review the improvements identified in after-action reports from actual events and identify common lessons learned, strengths, and areas for improvement.

“Postal Service policy requires the Office of National Preparedness to review the improvements identified in after-action reports from actual events and identify common lessons learned, strengths, and areas for improvement.”

After-Action Report

On February 2, 2023, the postmaster held an after-action meeting with the Buffalo delivery unit managers to discuss lessons learned and suggestions to improve future winter storm responsibilities. The meeting included discussions about the importance of timely communication and messaging for facility closures between district officials and managers of facilities at risk of severe weather during a winter storm. They also discussed the need to purchase emergency supplies and equipment such as cots and blankets. The district manager stated that at the meeting, attendees agreed to have a follow-up meeting once they ordered emergency supplies and equipment at the start of the new fiscal year in preparation for the upcoming winter season.

Throughout this audit, we inquired as to whether a report capturing the lessons learned discussed during the after-action meeting held in February 2023 was prepared, and if so, if it could be provided for our review. On December 19, 2023, the executive director of the Office of Continuity and Preparedness in Postal Service Headquarters provided the OIG an after-action report titled, *After Action Report/Improvement Plan Real World Winter Storm Elliott NY3*, dated September 30, 2023. However, while the Buffalo postmaster attended after-action meetings in February and September, the report did not include Williamsville delivery unit lessons learned, such as the

¹³ Management Instruction AS-280-2021-7.

¹⁴ IEMPs are available for postal facilities covered under area and district offices.

¹⁵ The after-action report documents key information related to an emergency event, highlighting strengths and areas for improvement.

¹⁶ Management Instruction AS-280-2021-7.

need for emergency supplies, which were previously discussed in February 2023. The September 2023 after-action report noted that reaction time from district management to the delivery unit to suspend operations is key. Additionally, the report stated the district was not prepared for employees to shelter at delivery units but did not mention how they intended to implement changes to address the deficiencies in the future.

When asked why the after-action report was not completed until nine months after the storm, the executive director stated the after-action report identified in the district EMT emergency response checklist was not required, but they encouraged the postmaster to complete

an after-action report for the Buffalo delivery units. Postal Service policy states the emergency response checklist is a critical component of emergency preparedness.¹⁷ Although the emergency response checklist does not provide timeframes for when after-action reports should be completed, it states that lessons learned should be documented in a final after-action report.¹⁸

The after-action report did not sufficiently address corrective actions needed following Winter Storm Elliott because the Postal Service did not have a process to verify that the report identified and documented lessons learned to address needed improvements. Although the policy states the director of the Office of National Preparedness should review the necessary improvements identified in after-action reports,¹⁹ the policy does not state who is responsible for identifying and documenting lessons learned following weather emergencies. Additionally, the guidance states district management should capture recommendations in a formal after-action report.

However, a formal review and approval procedure does not exist to verify that the after-action report identifies and documents lessons learned to address needed improvements following a weather emergency.

Lessons Learned

In an attempt to apply lessons learned to improve the management of future weather emergencies, the emergency preparedness specialist met with the district manager and postmaster and provided the FY 2024 Winter Weather Readiness Toolkit on December 5, 2023, in preparation for the winter season. The updated Toolkit provided information about winter safety talks related to carrier safety, links

“In an attempt to apply lessons learned to improve the management of future weather emergencies, the emergency preparedness specialist met with the district manager and postmaster and provided the FY 2024 Winter Weather Readiness Toolkit on December 5, 2023.”

to the district EMT emergency response checklist, and preparedness contacts for all Postal Service areas, which were not covered in FY 2023. However, unlike the previous version, the FY 2024 Toolkit did not include a list of the necessary supplies that should be set aside for emergency use, such as the blankets and nonperishable food needed by the employees that sheltered at the Williamsville delivery unit during Winter Storm Elliott.

On December 7, 2023, the postmaster met with Buffalo delivery unit managers to discuss emergency preparedness for the winter season and provided

the updated Toolkit for review. Specifically, the postmaster discussed the need for more frequent communication between district management and delivery units but did not develop a procedure to document how often the communication should occur. Additionally, the postmaster discussed the process for purchasing standard supplies to prepare for the winter season. As a result, they purchased ice scrapers, shovels, drinking water, and salt for

¹⁷ Management Instruction AS-280-2021-7.

¹⁸ District EMT Winter Storm Emergency Response Checklist.

¹⁹ Management Instruction AS-280-2021-7.

the Buffalo delivery units. They also purchased blankets for the Williamsville delivery unit. However, according to the postmaster, they did not purchase cots because they do not have the storage space. Additionally, the postmaster stated they did not purchase nonperishable food because that typically is not a supply item they purchase, although it is listed as an essential emergency supply in the FY 2023 Toolkit.

Without documenting lessons learned timely and addressing areas for improvement, the Postal Service is at risk of being unable to mitigate issues identified from previous events to prevent future reoccurrence. Because the New York 3 District EMT did not incorporate the lessons learned specific to Williamsville and address needed improvements, such as essential emergency supplies units should have on hand, the likelihood increases that delivery unit management in Buffalo will not be prepared to safeguard employees during future winter storm emergencies, as this area receives some of the heaviest snowfall in the country. Additionally, the Office of National Preparedness is unable to identify systemic improvements if after-action reports do not properly document all lessons learned following weather emergencies.

“Postal Service officials stated that all employees have access to the Employee Assistance Program for counseling and guidance following a crisis or traumatic experience.”

Postal Service’s Response to the Congressional Inquiry

On May 30, 2023, Postal Service officials responded to the congressional inquiry, about postal operations during Winter Storm Elliott (see [Appendix B](#)). In their response, the officials stated the Postal Service settled all grievances filed and compensated the appropriate employees affected by Winter Storm Elliott. The compensation included employees’ time, hotel bills, and other emergency expenditures. The settlement also granted administrative leave from December 23 to December 25, 2022, and for December 27, 2022, to cover travel costs.

Additionally, Postal Service officials stated that all employees have access to the Employee Assistance

Program for counseling and guidance following a crisis or traumatic experience. They also noted local managers²⁰ responsibility for making decisions during emergencies affecting their facility or service area. Facility managers coordinate with district leadership²¹ regarding potential decisions before extreme weather occurs. Following these discussions, facility managers make the determination whether to curtail operations and release employees.

Recommendation #3

We recommend the **Vice President, Corporate Affairs**, update the policy to 1) include who is responsible for conducting an after-action report and 2) direct the individual responsible to establish timeframes for completing a formal after-action report.

Recommendation #4

We recommend the **Vice President, Retail and Delivery Operations, Atlantic Area** 1) develop a process to verify after-action reports include lessons learned identified by all delivery units in their district and 2) incorporate the lessons learned from Winter Storm Elliott regarding essential emergency supplies into the Fiscal Year 2024 Winter Weather Readiness Toolkit.

Management’s Comments

Management disagreed with the findings and recommendations 1, 2, and 4. Management agreed with recommendation 3. See [Appendix C](#) for management’s comments in their entirety.

Regarding the findings, management stated the supplies in the Toolkit are listed under *personal preparedness measures* and requiring these supplies to be stockpiled nationally is not feasible. Management further stated that the timely suspension of operations to ensure employee safety is the recommended response to a significant winter storm and that sheltering in place should be

²⁰ Local managers are district managers responsible for a given district, or postmasters responsible for at least one postal facility.

²¹ District leadership is comprised of district managers and postmasters.

a last resort. Additionally, management stated the emergency response checklist and the Toolkit are updated at least yearly and shared with EMTs to provide guidance for responding to winter storms. Management also stated the winter weather guidance was communicated by district officials and the Buffalo postmaster and they held daily meetings with station managers from December 22 through December 25, 2022. Lastly, management noted the three carriers who left the delivery unit on December 23, 2022, were not subjected to life threatening conditions because they left before management's decision to cease operations at 1 p.m.; noting that the reference to "life threatening conditions" is misleading because once all carriers were removed from the street, those conditions did not exist.

Regarding recommendation 1, management stated the policy was never intended to set prescribed field responses for each individual threat type. Management further stated they cannot set arbitrary, pre-determined timelines that remove management discretion and the ability to react to circumstances faced with each unique event. Lastly, management stated it would be more appropriate to revise the guidance to delineate between personal preparedness and supplies that can reasonably be stored at facilities.

Regarding recommendation 2, management stated the action to close facilities when situations become life threatening during a winter weather emergency already exists in the New York 3 District's emergency plan. Management stated that for Winter Storm Elliott, district management and the Buffalo postmaster took immediate action to safeguard employees and they returned to their offices by 10:30 a.m., when conditions changed on December 23, 2022. Management noted the examples cited in this report were from only two of over 130 impacted offices, which is not representative of the overall effectiveness of the actions taken.

Regarding recommendation 3, management plans to update the policy to identify the stakeholders responsible for conducting post incident reviews and establish general timelines for completing

after-action reports. The target implementation date is September 30, 2024.

Regarding recommendation 4, management stated the process to verify after-action reports already exists and they will be reinforced based on actions to address recommendation 3. Management also stated the emergency supplies referenced in the audit were related to personal preparedness guidance and does not view their inclusion as a lesson learned from Winter Storm Elliott. Lastly, management stated since the Toolkit is now prepared and distributed on a national level, it would be unreasonable for the Atlantic Area to modify it.

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendation 3 and the corrective actions planned to address the recommendation should resolve the issue identified in the report. We consider management's comments to recommendations 1, 2, and 4 as unresolved and will work with management through the formal audit resolution process.

Regarding the findings, we believe the report's conclusions and evidence provided support our recommendations for additional management attention of emergency preparedness, response, and recovery from future winter storm emergencies in areas such as Buffalo, NY.

Regarding recommendation 1, although management stated the supplies needed to safeguard employees are more appropriately addressed in the Toolkit, the Toolkit is not required by policy. Additionally, the policy should, but currently does not, provide a baseline for what supplies are needed to safeguard employees, particularly in areas that receive heavy snow such as Buffalo, NY. Management should not limit supplies to shovels and salt, but should also include flashlights, blankets, drinking water, and nonperishable food in case of emergencies where employees are forced to shelter.

Regarding recommendation 2, despite the existence of policy authorizing the postmaster to close a facility, the postmaster did not immediately release employees who returned to their offices by 10:30 a.m. on December 23, 2022. Therefore, reiterating

the authorities and responsibilities with district management and the postmaster will mitigate untimely decisions in the future.

Regarding recommendation 4, while management disagreed, with their actions to address recommendation 3 and acknowledgement that verifying lessons learned in after-action reports will be reinforced by the Office of Continuity and Preparedness, we consider management partially responsive to this recommendation. However, we still believe essential emergency supplies should be identified in the FY 2024 Toolkit and will further discuss this with management during the resolution process.

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

All recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed.

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Appendix A: Additional Information

Scope and Methodology

The scope of our audit included assessing how New York 3 District management prepared for and performed during and after Winter Storm Elliott from December 22 to December 27, 2022.

To accomplish our objective, we:

- Interviewed Postal Service officials from headquarters, the Atlantic Area, and the New York 3 District to determine the events surrounding Winter Storm Elliott.
- Interviewed U.S. Postal Inspection Service officials to understand their role in emergency preparedness during Winter Storm Elliott.
- Conducted site visits at the Williamsville and West Side delivery units in Buffalo, NY, to talk with managers and employees affected by Winter Storm Elliott.
- Assessed winter storm emergency preparedness plans and procedures for safeguarding mail, postal facilities, and employees.

We conducted this performance audit from April 2023 through March 2024 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings based on our audit objective. The evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on February 6, 2024, and included their comments, where appropriate.

In planning and conducting the audit, we obtained an understanding of the Postal Service's emergency preparedness internal control structure to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the program and mitigating

associated risks. Additionally, we assessed the internal control components and underlying principles, and we determined Control Activities were significant to our audit objective.

We developed audit work to ensure that we assessed these controls. Based on the work performed, we identified internal control deficiencies related to Control Activities that were significant within the context of our objective. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of Integrated Emergency Management data by performing tests for data completeness, validity, and reasonableness. We determined that the data were sufficiently reliable for this report.

Prior Audit Coverage

There were no audit reports issued within the last five years related to emergency preparedness.

Appendix B: Postal Service's Response to Congress

GOVERNMENT RELATIONS



May 30, 2023

The Honorable Kirsten E. Gillibrand
United States Senate
Washington, DC 20510-3205

The Honorable Charles E. Schumer
United States Senate
Washington, DC 20510-3203

The Honorable Brian Higgins
House of Representatives
Washington, DC 20515-3226

Dear Senator Gillibrand, Senator Schumer, and Congressman Higgins:

This responds to your April 19 letter to Postmaster General Louis DeJoy, regarding postal operations during Winter Storm Elliott.

I appreciate this opportunity to share some of our policies and practices around safety and preparedness. Please know that we take this issue very seriously—safety is the first priority for all U.S. Postal Service operations and policies.

Our National Preparedness team works from the headquarters level down through the areas and districts to provide situational awareness of severe weather events, with the goal of preparing postal leadership for potential operational disruptions (such as floods, hurricanes, and earthquakes). To instill an effective level of preparation across the organization, National Preparedness assists area and district leadership in the creation and maintenance of integrated emergency management plans, to include concepts of operation to be followed, emergency action (evacuation) planning, continuity of operations planning, and specific contingency planning across a range of threat types.

For extreme winter weather, the National Preparedness office has created a framework of documentation for Emergency Management Teams at the district and area levels, as well as for mail processing operations generally. These checklists provide leaders with concrete guidance on all aspects of emergency management during severe winter storms, including how to gather information and assess the weather's threat; how to communicate critical information across multiple channels; and how to protect people, property, and product. This documentation is available to all Postal Service employees through our internal network and is shared proactively with district and local leaders ahead of extreme winter weather. I have enclosed these documents for your information.

For answers to your specific questions, we contacted New York 3 District officials, as well as National Preparedness and emergency management officials at Postal Service headquarters.

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-3500
WWW.USPS.COM

Their responses are below:

- 1. Will employees who were stranded or immobilized due to the extreme weather be fully compensated? Have they been offered psychological counseling?**

All appropriate employees have been fully compensated. This includes compensation for employees' time as well as additional expenses such as hotel bills or other emergency expenditures. For counseling and guidance following any crisis or traumatic experience, all Postal Service employees have access to the Employee Assistance Program, a free, voluntary, and confidential program that offers assessment, referral, short-term counseling, and work/life consultation to postal employees and their families.

- 2. What is the chain of command and decision-making process for releasing employees back to their homes in extreme weather scenarios?**

Local managers are responsible for making decisions during emergencies affecting their facility or service area. These individual facility managers confer with district leadership regarding potential decisions before extreme weather occurs. Following these discussions, individual facility managers make the determination whether to curtail operations and release employees. During the most widespread or severe events, district leaders may exercise their authority to release all employees in the district.

- 3. Weather outlets and federal agencies were reporting for days ahead of Winter Storm Elliott that it would be a "once-in-a-generation" winter storm. Did managers and their superiors develop a contingency or safety plan in advance of the storm?**

In addition to the National Preparedness documents mentioned previously, local management in conjunction with district leadership provided safety messaging and stand-up talks before, during, and after the storm. These touchpoints contained critical updates and statuses on weather forecasts, accumulations, people, property, and products. Continuity of operations plans are prepared and available for each facility manager during emergency situations, including extreme weather events.

- 4. Have managers who allegedly held employees until the afternoon on December 23 and threatened to call law enforcement on sheltering workers faced any disciplinary action? If not, is there currently an ongoing investigation?**

The determination to curtail operations occurred at approximately 10:00 a.m. on December 23, and employees were informed to return to their units. At approximately 1:00 p.m., all postal employees were released on administrative (paid) leave. Many employees chose to depart for their homes, and those who chose to stay were allowed to shelter in place. No employees were forced to leave any facility.

It should be noted that Postal Service employees who feel they have been subject to improper personnel actions have access to formal dispute resolution forums. These grievance arbitration procedures, established under the national agreements between the Postal Service and the postal unions, provide the proper forum for resolving disputes involving the interpretation of rules, the perception of offensive behavior, or adverse management actions. They provide an opportunity clarify facts and engage in a full discussion of the issues, and they offer an ultimate level of appeal to an arbitrator who is independent of the Postal Service. This gives employees and their representatives the opportunity to present information in support of their position and receive an impartial hearing.

Page 3

Following Winter Storm Elliott, some employees filed such grievances, and all have been settled or resolved.

5. **Under what scenarios, if at all, are managers and other USPS officials able to delegate the authority to send employees home to leaders working on site?**

As mentioned, local and district management are responsible for the safety and well-being of their employees during an emergency. During an extreme weather event, local and district management confer before and during the event to ensure they make the appropriate decisions to safeguard our employees. Managers rely on many sources to help determine when to order employees to shelter in place and when to release employees from sheltering in place.

I understand your concerns given the media coverage and anecdotal reports following this crisis. Please be assured that we make every effort to adequately prepare and respond to extreme weather, which includes employee and customer safety as the first priority. If you have any further questions regarding this topic, I would be happy to address them.

Sincerely,



Scott R. Slusher
Director, Government Liaison

Enclosure

Appendix C: Management's Comments



2/29/24

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: U.S. Postal Service Emergency Preparedness: Winter Storm Elliott – (23-094)

Thank you for providing the Postal Service an opportunity to review and comment on the findings contained in the draft audit report, *U.S. Postal Service Emergency Preparedness: Winter Storm Elliott*.

Please know that we take emergency preparedness very seriously. Safety is our paramount concern for all U.S. Postal Service employees and operations, and our policies reflect that. The findings in this audit are misleading and contain many inaccuracies. The report focuses on 2 office locations as part of a winter weather event that impacted over approximately 132 offices in the NY3 District. The scope of this audit does not accurately capture the preparation, response, and recovery actions taken by the Postmaster of Buffalo and District management nor the broader impact this weather event had on the entire NY3 District.

Management disagrees with the findings as follows:

Finding #1:

As to "the Toolkit ...listed supplies, such as flashlights, blankets, drinking water, and nonperishable food, that should be set aside for emergency use.":

The 2023 Atlantic Area Winter Weather Readiness Toolkit listed these supplies under *personal* preparedness measures. Requiring Postal management across the country to stockpile them at the start of the winter season is not feasible from a funding standpoint nor manageable from a maintenance standpoint. The stockpiling of the listed supplies cannot be mandated by national policy, nor would it serve as practical guidance. The timely suspension of operations to ensure that employees can get home safely is the recommended response to a significant winter storm, and mandating or advising that these supplies be on hand would undermine that recommendation. Sheltering-in-place should only be a last resort when unexpected or exigent circumstances prevent employees from safely traveling home.

As to "there is no guidance that clarifies how district and facility management should prepare for weather emergencies or provides timelines for when emergency preparedness guidance should be distributed for implementation", and "The Toolkit, if implemented and communicated timely, could assist postal employees in preparing for winter weather emergencies.":

The Winter Storm Emergency Response Checklists and the national Winter Weather Readiness Toolkit (which replaced the Atlantic Area Winter Weather Readiness Toolkit) are reviewed and updated as necessary at least yearly and then shared with Emergency Management Teams to provide guidance for responding to winter storms. Management believes these concerns can be addressed with a few minor edits to the Checklists and Toolkit.

As to “Specifically, the district manager did not forward the Toolkit to the postmaster to share with Williamsville delivery unit management until December 22, 2022, 37 days after initially receiving the preparedness guidance. The postmaster stated they received the Toolkit on December 22, 2022, one day before Winter Storm Elliott began, but did not recall forwarding it to or following up with the delivery unit manager to ensure they received and understood their responsibilities to prepare and safeguard employees if a storm occurs”:

The report incorrectly states that the toolkit was not shared. This guidance was communicated by District Safety and the Postmaster of Buffalo, including during the pre-storm touchpoint held with the station managers on December 22, 2022. Multiple touchpoints were then held each day on December 23rd, December 24th, and December 25th, 2022.

Finding #2:

As to “The lack of a timely decision resulted in three Williamsville delivery unit carriers becoming immobilized on the road while driving home due to hazardous weather conditions, including one who was eight months pregnant” and the reference to “life threatening conditions”:

The 3 carriers mentioned all departed prior to the operation being curtailed at 1PM. This was not a result of the lack of a timely decision as the 3 employees chose to leave prior to management’s 1PM decision. The reference to “life threatening conditions” is misleading – as once all carriers were removed from the street, those conditions did not exist.

Finding #3:

As to “However, unlike the previous version, the FY 2024 Toolkit did not include a list of the necessary supplies that should be set aside for emergency use, such as the blankets and nonperishable food ...”, “... although it is listed as an essential emergency supply in the FY 2023 Toolkit.”, “such as essential emergency supplies units should have on hand”:

See management response in Finding #1 pertinent to the supplies cited in these excerpts.

Following are our comments on each of the four recommendations:

Recommendation 1: We recommend the **Vice President, Corporate Affairs**, update Management Instruction AS-280-2021-7 to instruct district management to 1) establish appropriate timelines for communicating preparedness information to postmasters and managers in preparation for a winter weather emergency and 2) outline supplies needed at Postal Service facilities to safeguard employees.

Management Response/Action Plan: Management disagrees with this recommendation.

Management Instruction AS-280-2021-7 and its precursors established as policy the all-hazards integrated emergency management discipline to be followed by the Postal Service. It was never intended to set policy regarding prescribed field responses for each individual threat type.

We cannot advocate a “cookie cutter” approach to management’s response to emergencies, and so we cannot instruct management to set arbitrary, pre-determined timelines that remove discretion and their ability to react to the evolving circumstances they face with each unique event. The actions taken by local management are simply too dependent on the nature of a particular event. Part 1 of this recommendation is more appropriately addressed by modifying guidance (in this case the Winter Storm Emergency Response Checklists) rather than creating policy applicable to one threat type as recommended.

As stated in our response to Finding #1, management's goal is to ensure all employees get home safely and not have to shelter in place. Instructing district management across the country to require facility managers to stock *personal* preparedness supplies undermines this goal, does not ensure standardization in implementation, and is not feasible without the requisite funding for acquisition and maintenance. Part 2 of this recommendation is also more appropriately addressed by revising guidance (in this case the national FY2024 Winter Weather Readiness Toolkit) so that facilities are equipped with similar safety supplies on hand, including shovels, salt, etc. The guidance provided will clearly delineate between supplies that are recommended for personal preparedness and those that can reasonably be expected to be on hand at any facility.

Target Implementation Date: N/A

Responsible Official: N/A

Recommendation 2: We recommend the **Vice President, Retail and Delivery Operations, Atlantic Area**, reiterate authorities and responsibilities with district management and direct the Buffalo postmaster to take immediate action to close facilities when situations become life threatening during a winter weather emergency in accordance with existing policy and guidance.

Management Response/Action Plan: Management disagrees with this recommendation as it implies the process was not already in place and had not been followed. The items listed in the recommendation already exist as they are part of the comprehensive emergency plan already established in the New York 3 District and implemented for any weather-related emergency. For Winter Storm Elliott, District Management and the Buffalo Postmaster did take immediate actions to safeguard employees once conditions changed; all employees returned to their offices by 10:30am on 12/23/22, were safe and fully accounted for. The Postmaster of Buffalo and District Manager closed approximately 53 units on 12/23/2022 and they remained closed through 12/24/2022. An additional 79 units were affected in the 136xx Zip Code service area with limited delivery. The examples cited in this audit were from only 2 impacted offices out of over 130, which is not a true sample representative of the overall effectiveness of the actions taken.

Target Implementation Date: N/A

Responsible Official: N/A

Recommendation 3: We recommend the **Vice President, Corporate Affairs**, update the policy to 1) include who is responsible for conducting an after-action report and 2) direct the individual responsible to establish timeframes for completing a formal after-action report.

Management Response/Action Plan: Management agrees with this recommendation. We plan to address this recommendation by updating AS-280-2021-7 so that the policy identifies the stakeholders responsible for conducting post incident review and establishes general timelines for completing after-action reports. To achieve a uniform, enterprise-wide standardization across a variety of threat types faced by the Postal Service, the policy will clarify when post incident reviews and formal AAR are appropriate. We do not believe that it is appropriate to leave these policy functions to operational management in the field as doing so will lead to varied approaches that will reduce the effectiveness of the after-action process.

To summarize, Management will update AS-280-2021-7, by:

1. Identifying the stakeholders responsible and appropriate timelines for conducting post incident reviews, drafting after action reports and improvement plans (AAR/IP), and final review and approval of AAR/IP;
2. Recognizing that not all incidents and emergency events will rise to the level of requiring a formal AAR/IP; and
3. Establishing that a seasonal AAR may be appropriate in situations where emergencies of the same threat type affecting the same service area occur in quick succession.

Target Implementation Date: September 30, 2024

Responsible Official: Executive Director, Continuity and Preparedness.

Recommendation 4: We recommend the **Vice President, Retail and Delivery Operations, Atlantic Area**, to 1) develop a process to verify after-action reports include lessons learned identified by all delivery units in their district and 2) incorporate the lessons learned from Winter Storm Elliott regarding essential emergency supplies into the Fiscal Year 2024 Winter Weather Readiness Toolkit.

Management Response/Action Plan: Management disagrees with this recommendation. As to Part 1, this process already exists, facilitated by Emergency Preparedness and to be reinforced by Continuity and Preparedness as cited in their response to Recommendation 3. As to Part 2, the emergency supplies referenced in the audit were pulled from personal preparedness guidance, so management does not view their inclusion as a lesson learned from Winter Storm Elliott. Further, the Winter Weather Readiness Toolkit is now prepared and distributed on a national level; it would not be a reasonable request for the Atlantic Area to modify it.

Target Implementation Date: N/A

Responsible Official: N/A
E-SIGNED by JUDITH A DE TOROK
on 2024-03-01 12:05:08 EST

Judy A. de Torok
Vice President, Corporate Affairs
E-SIGNED by SCOTT.P RAYMOND
on 2024-03-01 10:40:22 EST

Scott P. Raymond
Vice President, Retail and Delivery Operations, Atlantic Area

cc: Chief Retail & Delivery Operations
Corporate Audit Response Management

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