



Office of Inspector General | United States Postal Service

Audit Report

Facility Condition Reviews – Mail Processing Facilities

Report Number SM-AR-19-003 | May 6, 2019



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Highlights

Background

In FY 2018, the U.S. Postal Service had 286 mail processing facilities with over 70 million interior square feet. Between October 2010 and February 2018, mail processing facilities generated more than 46,000 maintenance requests and incurred over \$876 million in maintenance costs.

The Postal Service is obligated, by both internal policies and federal regulations, to maintain facilities in accordance with prescribed standards to provide a safe and healthy workplace for its employees.

Our objective was to determine if Postal Service management adhered to building safety, maintenance, and security standards at mail processing facilities. Our scope included 32 statistically selected mail processing facilities nationwide.

What the OIG Found

Postal Service mail processing facilities did not consistently meet prescribed building safety, maintenance, or security standards. We identified 282 deficiencies at the 32 facilities, which ranged from minor oversight infractions to more serious fineable violations.

For the 282 deficiencies identified:

- One hundred forty-five (51 percent) deficiencies at 27 facilities related to safety, to include blocked fire extinguishers and/or blocked fire alarm pull stations;
- Sixty-eight (24 percent) deficiencies at 24 facilities related to maintenance, to include severely damaged roofing, ceilings, and infrastructure; and,

- Sixty-nine (25 percent) deficiencies at 27 facilities related to security, to include unsecure vehicles, non-functioning security cameras, and unsecure perimeter fences.

At one facility, building safety deficiencies were so severe that we escalated the issues to Postal Service leadership while on-site. Subsequently, the Postal Service contracted with an engineering firm to complete a structural evaluation. In a February 2019 report, the engineering firm recommended that the Postal Service complete permanent repairs to structural concrete slabs. The report also recommended that management perform site observations and a structural review of floor slab construction subjected to forklift traffic.

The reasons for the deficiencies related to building safety, maintenance, and security included facility personnel not conducting required safety reviews and housekeeping inspections, and facilities not having the authorized complement of maintenance employees on the rolls.

When corrective actions are not implemented, or are implemented but inadequate, issues may continue to exist, increasing the Postal Service's exposure to Occupational Safety and Health Administration (OSHA) fines, and the risk of injury to employees and customers. At the 32 facilities we visited, 116 of the 215 safety and security deficiencies identified were potential OSHA violations subject to fines.

What the OIG Recommended

We recommended management develop and implement an action plan to address deficiencies identified during our audit, including the engineering firm report, to include a timeline for completing items; and, hire additional maintenance staff at locations where appropriate.

Transmittal Letter



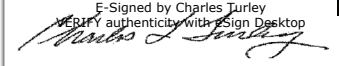
OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

May 6, 2019

MEMORANDUM FOR: ROBERT CINTRON
VICE PRESIDENT, NETWORK OPERATIONS

TOM A. SAMRA
VICE PRESIDENT, FACILITIES

E-Signed by Charles Turley
VERIFY authenticity with Sign Desktop



FROM: Charles L. Turley
Deputy Assistant Inspector General
for Supply Management and Human Resources

SUBJECT: Audit Report – Facility Condition Reviews – Mail Processing
Facilities (Report Number SM-AR-19-003)

This report presents the results of Facility Condition Reviews – Mail Processing
Facilities (Project Number 18SMG017SM000).

We appreciate the cooperation and courtesies provided by your staff. If you have
any questions or need additional information, please contact Lori Lau Dillard,
Director, Supply Management and Facilities, or me at 703-248-2100.

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of facility condition reviews at mail processing facilities (Project Number 18SMG017SM000). Our objective was to determine if U.S. Postal Service management adhered to building safety, maintenance, and security standards at mail processing facilities.

As of February 2018, the Postal Service had 286 mail processing facilities nationwide, with a median age of 31 years and a median footprint of 147,209 of interior square feet (SF). As shown in Table 1, our sampling methodology included clustering facilities into eight separate facility profiles¹ based on three risk factors:

1) age of the facility, 2) size of the facility in terms of square footage, and 3) the number of maintenance requests in the Facilities Single Source Provider system (FSSP).

To assess the effect of the three risk factors' contribution to building safety, maintenance, or security issues, we used the Design of Experiments (DOE)² approach to determine the potential effect of elevating a risk factor from a low level to a higher level. We then selected a stratified statistical sample of 32 facilities to assess building safety, maintenance, and security conditions. [Appendix A](#) provides additional information regarding this audit and Table 1³ illustrates risk factor distribution by facilities.

Table 1. Mail Processing Facilities by Risk Factors as of February 2018

Facility Profile	Risk Factors			Universe of Facilities	Sample of Facilities
	Age of Facility	Size of Facility in SF	Number of FSSP Requests		
1	Low	Low	Low	53	5
2	High	Low	Low	40	5
3	Low	High	Low	29	2
4	High	High	Low	11	4
5	Low	Low	High	12	4
6	High	Low	High	21	4
7	Low	High	High	54	4
8	High	High	High	66	4
Total				286	32

Source: Postal Service electronic Facilities Management System (eFMS) database.

- 1 Facilities with ages below the national median, below the median size in SF, and below the median number of maintenance requests were grouped into Facility Profile 1, Low, Low, Low. The remaining plants were grouped according to the matrix in Table 1.
- 2 We used the DOE two-level factorial approach for analysis. DOE is an approach to study the individual and interactive effects of many factors while keeping the number of experiment iterations (32 sample facilities in this case) to a minimum.
- 3 In this matrix, low and high represent below or above the Postal Service's national median for each factor.

Background

Postal Service mail processing facilities consist of processing and distribution centers (P&DC), network distribution centers (NDC), annexes, surface transfer centers, remote encoding centers, and international service centers. In FY 2018, there were 286 total mail processing facilities with over 70 million interior SF. Between October 2010 and February 2018, mail processing facilities generated more than 46,000 maintenance requests and incurred over \$876 million in maintenance costs.

The Postal Service is obligated, by both internal policies⁴ and federal regulations⁵ to maintain facilities in accordance with prescribed standards to provide a safe and healthy environment for both employees and customers. In addition, OSHA requires employers to provide a safe and healthy workplace free of recognized hazards. It is the responsibility of the postmaster or facility manager to ensure that maintenance is conducted in adherence with prescribed policies and regulations.⁶

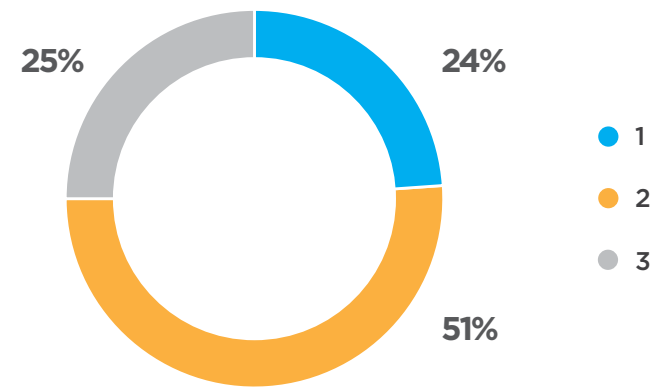
Finding #1: Building Safety Maintenance and Security Conditions

Facilities were not consistently maintained in accordance with applicable building safety, maintenance, and/or security standards. Across the 32 facilities assessed, we identified 282 deficiencies, which ranged from minor oversight infractions to serious fineable violations.

For the 282 deficiencies identified:

- One hundred forty-five (51 percent) deficiencies at 27 facilities related to safety.
- Sixty-eight (24 percent) deficiencies at 24 facilities related to maintenance.⁷
- Sixty-nine (25 percent) deficiencies at 27 facilities related to security.

Deficiency Breakout



Based on the DOE profile analysis, we determined that the age of the facility alone had a statistically⁸ significant effect, at a 95 percent confidence level, on the number of deficiencies at a facility (see [Table 2](#) for deficiencies by facility profile).

For example:

- Sixty-six percent (187 of 282) of all deficiencies identified were at facilities with a building age above the national median (Facility Profile 2, 4, 6, and 8 in [Table 2](#)).
- Forty-one percent (28 of 68) of the identified building maintenance deficiencies had a positive correlation between the facility's age and FSSP requests (Facility Profile 6 and 8 in [Table 2](#)).

⁴ Maintenance Management Order, MMO-136-17, February 8, 2018 and Handbook MS-47, *Housekeeping Postal Facilities*, June 1983.

⁵ The Occupational Safety and Health Act of 1970 and Handbook EL-801, *Supervisor's Safety Handbook*.

⁶ Handbook MS-47, *Housekeeping Postal Facilities*, Section 111, June 1, 1983.

⁷ Nineteen of these facilities did not adhere to all three building standards.

⁸ An observation at 95 percent confidence or higher cannot be attributed to random chance.

Table 2. Risk Factors and Number of Deficiencies

Facility Profile	Risk Factors				Number of Deficiencies			
	Age of Facility	Size of Facility in Square Feet	Number of FSSP Requests	Mail Processing Facilities	Safety	Maintenance	Security	Total
1	Low	Low	Low	5	9	5	5	19
2	High	Low	Low	5	20	5	9	34
3	Low	High	Low	2	13	12	5	30
4	High	High	Low	4	19	11	16	46
5	Low	Low	High	4	14	4	6	24
6	High	Low	High	4	29	12	11	52
7	Low	High	High	4	13	3	6	22
8	High	High	High	4	28	16	11	55
--	--	--	--	32	145	68	69	282

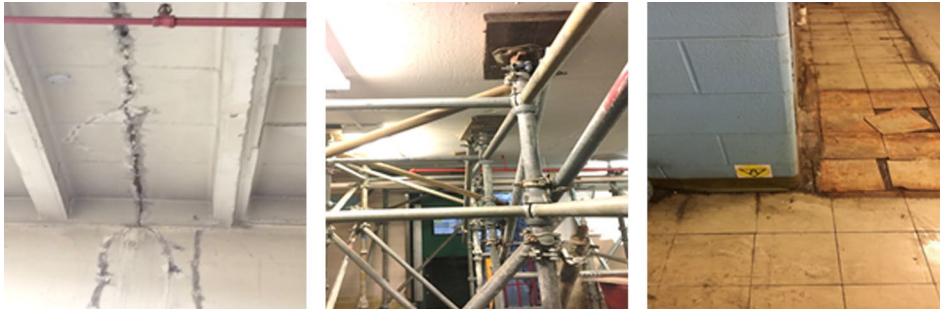
Source: OIG analysis.

Building Safety

A majority (84 percent) of the mail processing facilities assessed did not consistently adhere to applicable building safety standards. Of the issues identified, the most common deficiency related to fire extinguishers not being properly serviced. We identified 145 total building safety deficiencies, including:

- Five facilities (16 percent) had cracked and/or broken tiles labeled as asbestos. At the Indianapolis, IN, P&DC, we observed severely damaged roofing, ceilings, and other infrastructure which had the potential risk for falling debris (see [Figure 1](#)).

Figure 1. Indianapolis P&DC Issues



Damaged Ceiling & Infrastructure

Damaged Ceiling & Infrastructure

Damaged Floor Tiles

OIG photographs taken August 14, 2018.

These safety issues were escalated to the Postal Service's Chief Operating Officer on August 31, 2018.⁹ Subsequently, in October 2018, the Postal Service contracted with an engineering firm to complete a structural evaluation at the Indianapolis P&DC. In a February 2019 report, the engineering firm recommended that the Postal Service complete permanent repairs of the first-floor structural concrete slab as soon as practical. The consultant also recommended that management complete further site observations and a structural review of floor slab construction subjected to forklift traffic.

- At eight facilities (25 percent), fire extinguishers were not serviced monthly, as required.¹⁰
- At 18 facilities (56 percent), we found blocked fire extinguishers and/or blocked fire alarm pull stations (see Figure 2).
- At ten facilities (31 percent), we found blocked exit doors (see Figure 2).
- At ten facilities (31 percent), we found blocked electrical panels (see Figure 2).

⁹ OIG Safety and Security Escalation Protocol states the audit team should verbally communicate critical level safety issues to the facility plant manager and district manager, and the OIG director should communicate critical level safety issues via email to the Postal Service chief operating officer and applicable area vice president.

¹⁰ Occupational Safety and Health Standards, 1910.157 – Portable Fire Extinguishers.

¹¹ Some facilities had multiple building maintenance deficiencies.

Figure 2. Safety Issues



Blocked Fire Extinguisher

Blocked Exit Door

Blocked Electrical Panel

OIG photograph taken June 12, 2018, at the Richmond, VA P&DC.

OIG photograph taken June 13, 2018, at the Morgan P&DC

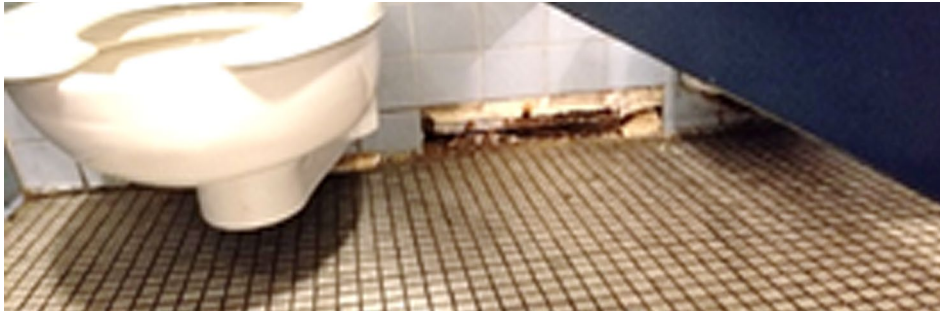
OIG photograph taken June 28, 2018, at the Corpus Christi P&DC.

Building Maintenance

A majority of the mail processing facilities assessed (75 percent) did not consistently adhere to applicable building maintenance standards.¹¹ Of the issues identified, about half of the 32 facilities visited had deficiencies related to ceiling appearance/damage. We identified 68 total building maintenance deficiencies, including:

- At seven facilities (22 percent), we found deficiencies related to general cleanliness of restrooms, including unsanitary urinals/toilets, missing floor/wall tiles, and dirty sinks and floors. A more egregious example at one facility (Northbay P&DC in Petaluma, CA) had a restroom with a dirty floor, missing wall tiles, and a hole in the wall (see [Figure 3](#)).

Figure 3. OIG photograph taken May 23, 2018, at the Northbay P&DC.



Restroom cleanliness, holes in walls, and missing wall tiles.

- At 16 facilities (50 percent), we found deficiencies related to stained or damaged ceiling tiles and/or leaking ceilings. To illustrate, Figure 4 shows a leaking ceiling at the Brockton, MA, P&DC. eFMS reports indicate the roof leaks as being reported; however, no actions have been taken to remedy the issue through the time of this reporting.

Figure 4. OIG photograph taken July 24, 2018, at the Brockton, MA, P&DC.



Ceiling leakage.

At three facilities (9 percent), we identified rodent issues, including a dead mouse that had not been removed from a trap in the administrative area for what appeared to be several days (see Figure 5). We also observed rodent droppings

that had not been removed or cleaned up at other facilities (Morgan and Brockton P&DCs).

Figure 5. OIG photograph taken May 7, 2018, at the Southern Maryland P&DC



Dead mouse left in a trap.

Building Security

A majority (84 percent) of the mail processing facilities assessed did not consistently adhere to applicable building security standards. Of the issues identified, the most common deficiency related to unsecure perimeter fences. We identified 69 total building safety deficiencies, including:

- At ten facilities (31 percent), the “U.S. Property, No Trespassing” security signage was not posted every 100 feet, as required.
- At two facilities (6 percent), Postal Service delivery and maintenance vehicles were unlocked in unsecured areas (see Figure 6 for an example).
- At fifteen facilities (47 percent) perimeter fences were unlocked/unsecure (see Figure 6 for an example).
- At nine facilities (28 percent) security cameras for monitoring of the facility exterior that did not function properly (see Figure 6 for an example).

Figure 6. Building Security



Unlocked vehicle

OIG photograph taken June 12, 2018, at the Richmond, VA P&DC.

Unlocked perimeter fence

OIG photograph taken June 12, 2018, at the Richmond, VA P&DC.

Partially functional security camera/monitor

OIG photograph taken June 28, 2018, at the Green Bay, WI P&DC.

Reasons for the deficiencies related to building safety, maintenance, and security were:

- Safety reviews and housekeeping inspections were not completed and reported as required at 28 (88 percent) and 19 (59 percent) of the 32 facilities reviewed, respectively. Facility managers stated that they failed to complete the required safety reviews and housekeeping inspections within the required timeframes because they did not consider the requirements to be a priority among their many duties. The lack of urgency by facility managers to complete safety reviews and housekeeping inspections resulted in maintenance and safety issues remaining unresolved, causing unsanitary and unsafe conditions for employees.
- Maintenance and safety officials at 18 (56 percent) of the 32 facilities reviewed stated that shortages in their full maintenance complement were a challenge in resolving maintenance, safety, and security issues. We analyzed current staffing data¹² and determined that 27 (84 percent) of the 32 facilities had less than the authorized complement of maintenance employees on the rolls.

¹² *Field Staffing and Support Report* for November 15 and 16, 2018.

¹³ OIG did not identify any OSHA fines assessed.

¹⁴ Average fine amount the USPS paid for OSHA violations from 2012 to 2015 which were identified in *Facility Condition Reviews – Western Area* (Report Number [SM-AR-17-009](#), dated September 8, 2017).

Maintenance staff remedied certain deficiencies brought to their attention during our site visits - such as displaying missing posters, unblocking exits, unblocking and inspecting fire extinguishers, unblocking electrical panels, and securing unlocked doors, gates and vehicles. However, these were temporary remedies and not indicative of long-term solutions. When corrective actions are not implemented, or are implemented but inadequate, issues may continue to exist, increasing the Postal Service's exposure to Occupational Safety and Health Administration (OSHA) fines, and the risk of injury to employees and customers.

At the 32 facilities we visited, 116 of the 215 safety and security deficiencies identified were potential OSHA violations subject to fines.¹³ Based on an average OSHA fine amount incurred of \$2,100 per incident,¹⁴ we estimated a potential fine amount of \$243,600 for the Postal Service.

Recommendation #1

The **Vice President, Network Operations**, develop and implement an action plan to address all building maintenance, safety and security issues identified during our audit, including a timeline for completing items, and/or justification for outstanding maintenance tickets.

Recommendation #2

The **Vice President, Facilities**, develop and implement an action plan to address structural recommendations at the Indianapolis Processing and Distribution Center, including a timeline for completing items.

Recommendation #3

The **Vice President, Network Operations**, hire additional maintenance staff at locations where appropriate.

Management's Comments

Management agreed with the report's findings and recommendations.

Regarding recommendation 1, management stated area Maintenance Operations managers will lead efforts to address all building maintenance, safety, and security issues identified in this audit; and provide photos of completed actions, where possible. In subsequent discussions with management, the target implementation date was revised to May 31, 2019.

Regarding recommendation 2, management stated that Indianapolis P&DC structural issues have been temporarily and safely stabilized and are being monitored by an external engineering firm monthly to ensure the conditions remain safe for employees and operations. Management stated that permanent repairs are on hold because the Postal Service may dispose this building in the near future. Management stated the stabilization effort and monthly monitoring will continue until a final disposition date for the building is determined. Management requested that we close the recommendation with the issuance of this report.

Regarding recommendation 3, management stated they are implementing a new MS-1, operation and maintenance, staffing process to determine the correct number of maintenance staff needed at each mail processing plant. Management stated they have suspended hiring in anticipation of potential maintenance staff reductions, but after each plant's staffing package is approved, they will be allowed to fill vacancies up to the new authorized levels. The target implementation date is August 1, 2019.

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

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations and planned actions should resolve the issues identified in the report.

Regarding recommendation 2, in subsequent discussions with management, we determined that all scaffolding and shoring to stabilize the Indianapolis P&DC's structural issues were completed on August 4, 2016, and the contract to provide monthly monitoring service was established on August 8, 2018. Based on these temporary remedies, management believes the recommendation should be closed with the issuance of this report. While corrective actions taken to date are going in the right direction, we believe permanent repairs are in the best interest of the Postal Service if it decides to keep the Indianapolis P&DC for operations. Therefore, we will keep this recommendation open until the final disposition date for the building is determined.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

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Appendix A: Additional Information

Scope and Methodology

Our audit scope included 286 Postal Service mail processing facilities as of February 12, 2018. We randomly selected 32 mail processing facilities in each Postal Service area to ensure employees was adhering to building maintenance, safety and security standards.

To accomplish our objective, we:

- Designed our site selections based on the mail processing facilities' age, size, and work tickets. Facilities in each of the eight design groups were randomized and sorted in random sequence order for 32 site visits with nationwide coverage.
- Accessed the FSSP, the eFMS, and eMARS to review repair and maintenance records and requests that were entered.
- Completed FCR checklist surveys for each facility and summarized results.
- Obtained copy of prior fiscal years' *Program Evaluation Guide* reviews,¹⁵ and eMARS, eFMS; and applicable reports in the Safety Toolkit to determine if building-related issues identified were corrected or abated.
- Interviewed the district safety specialist, lead maintenance manager, manager of Maintenance Operations and support staff at the 32 facilities

who were responsible for addressing and correcting facility maintenance, safety and security deficiencies to obtain an understanding of their roles and responsibilities.

- Interviewed a union official regarding concerns about the safety, security, and maintenance of the facility.
- Identified OSHA violations to determine the potential impact to the Postal Service based on prior fines paid for lack of compliance.

We conducted this performance audit from April 2018 through May 2019, in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on April 8, 2019, and included their comments where appropriate.

We assessed the reliability of FSSP, the eFMS, and eMARS data by analyzing available reports to maintenance and safety issues. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Facility Condition Reviews – Capping Report</i>	Identify trends or systemic issues identified from previous OIG facility condition reviews of Postal Service retail facilities and assess the effectiveness of management's corrective actions.	SM-AR-18-005	6/21/2018	\$182,500

¹⁵ A tool for documenting annual facility Safety & Health program evaluations and for analyzing the results at the district, area, and national levels.

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Facility Condition Reviews – Western Area</i>	Determine whether Postal Service management adhered to building maintenance and safety and security standards, and employee working condition requirements.	SM-AR-17-009	9/8/2017	None
<i>Facility Condition Reviews – Pacific Area</i>	Determine whether Postal Service adhered to building maintenance, safety and security standards, and employee working condition requirements.	SM-AR-17-007	9/6/2017	None
<i>Facility Condition Reviews – Eastern Area</i>	Determine whether Postal Service management adhered to building maintenance and safety and security standards, and employee working condition requirements.	SM-AR-17-004	5/10/2017	None
<i>Facility Condition Reviews – Southern Area</i>	Determine whether Postal Service management adhered to building maintenance and safety and security standards, and employee working condition requirements.	SM-AR-17-003	4/28/2017	None
<i>Facility Condition Reviews – Northeast Area</i>	Determine whether Postal Service management adhered to building maintenance and safety and security standards, and employee working condition requirements.	SM-AR-17-001	11/9/2016	\$10.6 million
<i>Facility Condition Reviews – Great Lakes Area</i>	Determine whether Postal Service management adhered to building maintenance and safety and security standards, and employee working condition requirements.	SM-AR-16-010	9/2/2016	None
<i>Facility Condition Reviews – Capital Metro Area</i>	Determine whether Postal Service management adhered to building maintenance and safety and security standards, and employee working condition requirements.	SM-AR-16-009	7/18/2016	None
<i>Working Conditions at the Jal Post Office</i>	Investigate reported poor working conditions at the Jal Post Office in New Mexico.	HR-MA-15-004	9/2/2015	None

Appendix B: Management's Comments



April 29, 2019

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Facility Condition Reviews – Mail Processing Facilities (SM-AR-19-
DRAFT)

Thank you for the opportunity to review and comment on the above referenced audit entitled "Facility Condition Reviews – Mail Processing".

Management agrees with the recommendations in the audit and will address each separately below.

Recommendation 1:

The Vice President, Network Operations, develop and implement an action plan to address all building maintenance, safety and security issues identified during our audit, including a timeline for completing items, and/or justification for outstanding maintenance tickets.

Management Response/Action Plan:

The Postal Service agrees with recommendation #1. The Headquarters, Maintenance Operations group will implement an action plan to address all building maintenance, safety and security issues identified during our audit, including a timeline for completing items, and/or justification for outstanding maintenance tickets. The Area, Manager(s) Maintenance Operations (AMMOs) will be furnished this information to drive completion through the Plant Maintenance organizations. Where possible, photos will be provided to show that the work was completed.

Target Implementation Date:

The process indicated above will be implemented by 4/29/19.

Responsible Official:

The Manager, Maintenance Planning and Support will be responsible for the implementation of the above indicated action, and will work with the Manager Repair

and Alteration and the Manager Safety & OSHA Compliance (Hq) to ensure completion and/or justification for outstanding deficiencies.

Recommendation 2:

The Vice President, Facilities, develop and implement an action plan to address structural recommendations at the Indianapolis Processing & Distribution Center, including a timeline for completing items.

Management Response/Action Plan:

Management agrees with the recommendation. Further, prior to the issuance of this report, Facilities initiated a project to address the structural issues noted in this report. At this time, the situation has been temporarily and safely stabilized. Additionally the site is being reviewed monthly by a third party engineering firm to ensure that the existing stabilized conditions remain safe for USPS employees and operations. The permanent repairs are on hold pending a possible disposal of this building in the near future. The stabilization effort and monthly monitoring will continue until the final disposition of the building is determined. Recommend closure of this recommendation.

Target Implementation Date:

Now

Responsible Official:

Manager, Repair and Alteration - West

Recommendation 3:

The Vice President, Network Operations, hire additional maintenance staff at locations where appropriate.

Management Response/Action Plan:

The Postal Service agrees with recommendation #3. The Headquarters, Maintenance Operations explained to the OIG audit team that we are currently implementing a new MS-1 staffing process and that field vacancies were not being filled to allow for potential reductions. This new process will determine the correct LDC37 staffing for each plant, and once each staffing package is approved, sites will be allowed to fill any authorized vacancies that remain.

- 3 -

Target Implementation Date:

The process indicated above will be implemented by 8/1/19.

Responsible Official:

The Manager, Maintenance Planning and Support will be responsible for the implementation of the above indicated action.

In conclusion, Management appreciates the OIG's efforts in auditing the Facility Condition Reviews in Mail Processing Facilities. The Draft Audit Report and Management's response pertaining to this particular issue does not contain information that management believes may be exempt from disclosure under the FOIA.



Robert Cintron
Vice President, Network Operations



Tom A. Samra
Vice President, Facilities

cc: Manager, Corporate Audit Response Management



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