Audit Report

Military, Diplomatic, and Other International Election Mail

OFFICIAL ABSENTEE VOTER BALLOT
(To be Opened by Local Election Board)
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Objective

Our objective was to evaluate the U.S. Postal Service’s preparedness for processing international election mail, including military and diplomatic mail. The Postal Service processes international election and political mail for eligible U.S. citizens throughout the world. Military and diplomatic members and their families or other U.S. citizens located in foreign countries can use or receive these types of mail. Election mail is any item mailed to, or from, authorized election officials that enables citizens to participate in the voting process. For example, local election offices in the U.S. send ballots or other election materials to international recipients and the international voters mail their completed election ballots back. Political mail is related campaign or messaging mail, and generally entails only outbound operations.

International election and political mail are typically processed at one of the five International Service Centers (ISC) which are located in New York, Miami, Chicago, San Francisco, or Los Angeles. Processing operations for military and diplomatic election mail are co-located with Postal Service processing functions for other international mail (i.e., letters, parcels, periodicals, etc.). Most international military and diplomatic mail is processed through the Chicago facility, and it is estimated this facility will receive about 80 percent of inbound military mail ballots for the 2020 presidential election.

International political and election mail has distinct processing procedures. For example, U.S. election offices are expected to send out international absentee ballots at least 45 days prior to a federal election (45 days prior to the federal election would be September 18, 2020, during this election cycle). Also, certain inbound military election ballots qualify for Express Mail service based on a partnership between the Postal Service and Department of Defense, while other international or diplomatic election mail is processed in the normal international mail stream.

The novel coronavirus disease outbreak (COVID-19) pandemic significantly impacted international mail service. For example, the Postal Service began suspending mail service to 22 countries in April 2020, and mail to some countries was still suspended as of August 2020. The Postal Service continues to monitor foreign postal operations and transportation for service impacts, including foreign postal operator service suspensions (embargo).

The Postal Service implemented a series of nationwide initiatives in July 2020 to improve operational efficiency. These efforts included a focus on reducing late and extra transportation trips and aligning workhours to mail volume workload. In addition, the Postal Service has been removing mail processing equipment since 2015 as a result of decreased mail volume. The Postal Service also implemented an organizational realignment in August 2020, which included moving the ISC reporting structure from the respective Areas to Headquarters.

Findings

The Postal Service’s preparedness for processing international election mail, including military and diplomatic mail, is at risk based on mail processing delays at the Chicago ISC. Operations at the Chicago ISC were significantly impacted beginning in late March 2020 primarily due to the COVID-19 outbreak and delays remained into mid-August, the time of our most recent observations at the facility. These delays threaten the facility’s overall ability to timely process military, diplomatic, and other international election mail.

Our analysis of Postal Service data for all international mail showed over 137,000 delayed pieces – both inbound to and outbound from – the Chicago ISC in mid-August, broken down as follows:

- **Inbound**: An estimated 38,000 pieces destined for U.S. domestic delivery were waiting at the ISC for additional handling and processing. These pieces were staged for processing, sometimes outside the facility due to the backlog, resulting in damaged labels and packaging. Postal Service data showed containers were delayed up to 24 days (as of August 18, 2020).

- **Outbound**: An estimated 99,000 pieces of outbound mail, including nearly 11,000 parcels originally destined for foreign countries, could not be processed due to either a lack of outbound air transportation or ongoing embargo by the foreign country. Postal Service data showed containers were delayed up to 17 days (as of August 18, 2020).
These delays stemmed primarily from staffing shortages, outbound mail restrictions, presentation and screening delays, and transportation-related delays resulting from the COVID-19-pandemic, as follows:

- **Staffing shortages:** Staff availability averaged about 67 percent between March 1 and August 22, 2020. The Postal Service hired over 500 temporary, supplemental staff beginning in mid-April 2020. However, nearly half of the supplemental staff were no longer on the complement rolls as of early August due to a high attrition rate. Further, the supplemental staffing agreements between the Postal Service and employee unions expires in late September 2020. Efforts in July 2020 to reduce overtime exacerbated these staffing shortages. These collective challenges made it difficult to fully address the inbound and outbound mail delays.

- **Outbound mail challenges and restrictions:** Outbound international mail that could not be sent due to a lack of available air transportation or foreign postal operator service suspension (embargo) resulted in a significant backlog of mail pieces and containers in the facility. Chicago ISC staff had to identify and segregate these pieces and perform additional handling and processing to determine whether the pieces would be returned to sender or sent to other Postal Service facilities with available transportation.

- **Presentation and screening delays:** Postal Service data showed about 45,000 parcels awaiting Customs and Border Protection (CBP) reviews in mid-August 2020, with some Express Mail containers not being tendered to CBP for two weeks. Postal Service officials stated they have coordinated with CBP to address some of these delays, and CBP responded with additional staff and modifications to its screening operations.

- **Transportation-related delays:** Mail backlogs at the Chicago ISC substantially hindered the airlines from timely tendering mail, as there was limited space available at the ISC to accept the inbound containers from the airlines and cargo handlers. While Postal Service staff worked to address these and other issues with the airlines and cargo handlers, delays remained. For example, in mid-August, the Postal Service had yet to receive containers from flights that landed 6-weeks prior (early July 2020).

We also determined that, as of mid-August, the Postal Service did not have an active system for tracking and reporting on eligible military, diplomatic, and other international election ballots. Postal Service officials stated they plan to leverage existing tracking and reporting capabilities in the Product Tracking and Reporting system via the Intelligent Mail barcodes. System modification testing to specifically track and report on election ballots, however, had not yet been completed. Testing was planned for early September 2020 at each ISC and other Postal Service facilities that could accept inbound ballots. Accurately tracking and reporting on eligible international election ballots would provide the Postal Service key visibility into the number of international election ballots it receives. This data would also provide insight on the respective flows and timing of each piece —information that would be valuable for visibility into ballot processing and handling.

While finalizing this report for publication, we observed operations at the Chicago ISC on September 29, 2020, as part of another ongoing project. International mail operations appeared significantly improved from our August 2020 observations. Specifically, the workroom floor was visibly clearer of inbound and outbound mail, as was the holding area for mail going into and out of CBP. These operational improvements were consistent with the implementation of Recommendations 1 and 2, as noted below.
Recommendations

We recommend management:

- Immediately develop and implement a Short-Term Operating Plan, including strategies, milestones, and responsibilities, to process the mail inventory backlog and ensure the timely processing and handling of international outbound and inbound election mail.

- Immediately develop and implement a Staffing Contingency Plan with strategies and responsibilities for ensuring the sufficient availability of staff for the upcoming election cycle, including options in case supplemental staff levels would be limited after the expiration of the current agreements in September 2020.

- Develop and implement rapid testing timeframes and procedures for tracking and reporting on eligible inbound election ballots at each of the ISCs and other facilities that could accept international election mail.
MEMORANDUM FOR:  MIKE L. BARBER  
VICE PRESIDENT, PROCESSING AND MAINTENANCE OPERATIONS  

FROM:  Janet M. Sorensen  
Deputy Assistant Inspector General  
for Retail, Delivery and Marketing  

SUBJECT:  Audit Report – Military, Diplomatic, and Other International Election Mail (Report Number 20-271-R20)  

This report presents the results of our audit of Military, Diplomatic, and Other International Election Mail.  

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Joe Wolski, Director, Sales, Marketing and International, or me at 703-248-2100.  

Attachment  

cc:  Corporate Audit Response Management  
Postmaster General
Results

Introduction/Objective
The U.S. Postal Service Office of Inspector General (OIG) is conducting a series of audits assessing the U.S. Postal Service’s preparedness for the November 2020 national election. This report presents the results of our self-initiated audit of Military, Diplomatic, and Other International Election Mail (Project Number 20-271). Our objective was to evaluate the Postal Service’s preparedness for processing international election mail, including military and diplomatic mail. See Appendix A for additional information.

Background
The Postal Service processes international election and political mail for eligible U.S. citizens throughout the world. Military and diplomatic members and their families or other U.S. citizens located in foreign countries can use or receive these types of mail. Election mail is any item mailed to, or from, authorized election officials that enables citizens to participate in the voting process.1 For example, local election offices in the U.S. send ballots or other election materials to international recipients and the international voters mail their completed election ballots back. Political mail is related campaign or messaging mail, and typically entails only outbound operations.

International election and political mail are typically processed at one of the five International Service Centers (ISC) which are located in New York, Miami, Chicago, San Francisco, or Los Angeles.2 Political and election mail has distinct identification and processing procedures. Regarding identification, the Postal Service has mechanisms to identify election and political mail throughout its network. Election mail trays should be identified with a Tag 191, Domestic and International Mail-In Ballots, and political mail trays should have a Tag 57, Political Campaign Mailing (see Figures 1 and 2).

Figure 1. Postal Service Election and Political Mail Identification Tags

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1 Election Mail is “any item mailed to or from authorized election officials that enables citizens to participate in the voting process, such as balloting materials, voter registration cards, absentee applications, and polling place notifications.”
2 Smaller amounts of international election mail could be processed at the Honolulu Processing and Distribution Center (P&DC) or Dulles P&DC.
3 There are over 1,000 military ZIP Codes and 100 diplomatic zip codes sorted at the CIMSC.
There are also corresponding unique processing of these international mails. For example, U.S. election offices are expected to send out international absentee ballots at least 45 days prior to a federal election (45 days prior to the federal election would be September 18, 2020, during this election cycle). International political and election mail can generally be routed through the Postal Service in one of three ways: (1) Postal Service-coordinated channels (mailings being processed along with other Postal Service international mail stream), (2) military channels, or (3) diplomatic channels.

As for military and diplomatic mail, the Postal Service partners with the U.S. Department of Defense (DoD) and U.S. Department of State (DoS) to deliver mail to military facilities in the continental U.S. as well as to military and DoS diplomatic personnel and their families outside the continental U.S. The military and diplomatic postal systems are an extension of the U.S. domestic postal system with regard to postage rates, mail acceptance, handling, and transportation, and rely on non-Postal Service staff (i.e., DoD and DoS) to process these mailings.

The Postal Service, DoD, and DoS each have responsibilities related to handling and processing this mail, and the processing flows differ for the various types of political and election mail (see Appendix B). For example, inbound military absentee ballots for the national election in November 2020 are to be affixed with a special Express Mail label⁴ (see Figure 3) to ensure they receive expedited service and enhanced tracking.

The novel coronavirus disease outbreak (COVID-19) pandemic significantly impacted international mail service. The Postal Service began suspending mail service to 22 countries in April 2020. The Postal Service continues to monitor foreign postal operations and transportation for service impacts and publishes applicable notifications to mailers and customers. For example, the Postal Service

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⁴ Through a joint federal agency initiative between the Postal Service and the DoD, military personnel at foreign military postal locations can return absentee ballots via Express Mail service using the 11-DoD Express Mail Label. This label is to be affixed to the top of the absentee ballot. These mailings are to be delivered on the day they arrive at the local Post Office facility and provide customers increased tracking capabilities.
has a website\(^5\) dedicated to presenting information on international mail service impacts due to foreign postal operator service suspension or unavailability of transportation (11 and 35 countries respectively as of September 9, 2020).

These COVID-19-related factors help illustrate how operations outside of the Postal Service’s control can impact international mail service for Postal Service customers. In addition to service disruptions from foreign posts or unavailable transportation, other variables such as mail class, mail preparation and entry, transportation, and security screenings can also impact the timeliness, efficiency, and security of international political and election mail (see Appendix C).

The Postal Service implemented a series of nationwide initiatives in July 2020 to improve operational efficiency. These efforts included a focus on reducing late and extra transportation trips and aligning workhours to mail volume workload. In addition, the Postal Service has been removing mail processing equipment since 2015 as a result of decreased mail volume. The Postal Service also implemented an organizational realignment in August 2020, which included moving the ISC reporting structure from the respective Areas to Headquarters.

Finding #1: Chicago International Service Center Operations

The Postal Service’s preparedness for processing international election mail, including military and diplomatic mail, is at risk based on mail processing delays at the Chicago ISC. Operations at the Chicago ISC were significantly impacted beginning in late March 2020 primarily due to the COVID-19 outbreak and delays remained into mid-August, the time of our most recent observations at the facility. Postal Service international mail data for August 18, 2020, showed over 137,000 delayed pieces at the Chicago ISC, broken down as follows:

- **Inbound:** An estimated 38,000 parcels destined for U.S. domestic delivery were awaiting additional handling and processing. These pieces were staged for processing, sometimes outside the facility, due to the backlog. CIMSC staff stated the labels and packaging on some of these parcels were significantly damaged while subject to outside environmental factors (e.g., rain and heat) while awaiting acceptance at the facility (see Figure 4). CIMSC staff noted these damaged parcels required additional recipient/address analysis. Postal Service data showed containers were delayed up to 24 days (as of August 18, 2020).

  ![Figure 4. Damaged Inbound Mailings at the Chicago ISC](image-url)

  Source: OIG staff photographs from August 18, 2020.

- **Outbound:** An estimated 99,000 pieces of outbound mail were delayed and required additional analysis and processing. Postal Service data showed containers were delayed up to 17 days (as of August 18, 2020). Postal Service data showed nearly 11,000 parcels originally destined for foreign countries that could not be delivered due to a lack of outbound air transportation or the country not accepting U.S. mailings (under embargo). See Appendix D.

These delays stemmed primarily from staffing shortages, outbound mail restrictions, presentation and screening delays, and transportation-related delays resulting from the COVID-19-pandemic, as follows:
Source: Postal Service employee availability data at the Chicago ISC between March 1-August 20, 2020. This data is based on 100 percent employee availability and takes leave and other excused absences into account. Postal Service officials reported a 79 percent national average for employee availability across its processing and distribution facility network in early August 2020.

- **Staffing shortages**: Staff availability averaged about 67 percent between March 1 and August 22, 2020 (see Figure 5).

  The Postal Service hired over 500 temporary, supplemental staff beginning in mid-April 2020. Staffing uncertainty remains, however, particularly as the supplemental staffing agreements between the Postal Service and employee unions expires September 25, 2020, and plant management stated that nearly half of the supplemental staff were no longer on the complement rolls as of early August due to a high attrition rate and a number of others had taken COVID-19-related leave. Efforts in July 2020 to reduce overtime exacerbated these staffing shortages. These collective challenges made it difficult to fully address the existing inbound and outbound mail delays.

- **Outbound mail challenges and restrictions**: Outbound international mail that could not be sent due to a lack of available air transportation or foreign postal operator service suspension (embargo) resulted in a significant backlog of mail pieces and containers in the facility. Chicago ISC staff had to identify and segregate these pieces and perform additional handling and processing to determine whether the pieces would be returned to sender or sent to other Postal Service facilities with available transportation.

- **Presentation and screening delays**: Postal Service data showed about 45,000 parcels awaiting CBP reviews in mid-August 2020 (August 18, 2020), with some Express Mail containers not being tendered to CBP for two weeks. The Postal Service recently reported improvements in this processing. Figure 6 showed a slight improvement in delays from our earlier observations on August 5, 2020, where we observed a 3-week delay. Postal Service officials stated they have coordinated with CBP to address some of these delays, and CBP responded with additional staff and modifications to its screening operations.
■ Transportation-related delays: Mail backlogs at the Chicago ISC hindered the airlines from timely tendering mail, as there was limited space available at the ISC to accept the inbound containers from the airlines or cargo handlers. Postal Service management stated these delays were later exacerbated by the way certain airlines and cargo handlers prioritized containers for delivery to the Chicago ISC—these groups were tendering the more recently arriving containers rather than the longer-delayed containers. While Postal Service staff worked to address these issues, airlines and cargo handlers continue to tender containers that have been stored at their airport facilities or outside the perimeter of the ISC. For example, on Friday, August 21, 2020, the Postal Service had yet to receive containers from flights that landed six weeks prior on July 10, 2020 (see Figure 7).

The congestion and staffing issues at the ISC resulted in delays (for both mail and parcels) and threaten the overall timely processing of international political and election mail at the Chicago ISC. The Postal Service needs to develop operating and staffing plans to (a) ensure the facility is operationally current – all delayed mail is cleared and newly arriving mail is processed in a timely manner – and adequately staffed in advance of the pending election mail season and (b) promote accountability and transparency in these operations. In particular, the short-term operating plan should include applicable strategies, milestones and responsibilities for addressing backlogs.

While finalizing this report for publication, we observed operations at the Chicago ISC on September 29, 2020, as part of another ongoing project. International mail operations appeared significantly improved from our August 2020 observations. Specifically, the workroom floor was visibly clearer of inbound and outbound mail, as was the holding area for mail going into and out of CBP. These operational improvements were consistent with the implementation of Recommendations 1 and 2, as noted below.
Recommendation #1
We recommend the Vice President, Processing and Maintenance Operations, immediately develop and implement a Short-Term Operating Plan, including strategies, milestones, and responsibilities, to process the mail inventory backlog and ensure the timely processing and handling of international outbound and inbound election mail.

Recommendation #2
We recommend the Vice President, Processing and Maintenance Operations, immediately develop and implement a Staffing Contingency Plan with strategies and responsibilities for ensuring the sufficient availability of staff for the upcoming election cycle, including options in case supplemental staff levels would be limited after the expiration of the current agreements in September 2020.

Finding #2: Election Mail Tracking and Reporting
The Postal Service’s preparedness for processing international election mail, including military and diplomatic mail, is at risk based on untested nationwide tracking and reporting capabilities. As of mid-August, the Postal Service did not have an active system for tracking and reporting on eligible ballots at its ISCs or other international mail accepting facilities. The Postal Service used a more rudimentary tracking and reporting system during the primary election — one that relied on manual scanning and tracking the destinating ZIP Code for each respective piece (see Figure 8).

Figure 8. Excerpt of CIMSC Election Ballot Tracking Report During Primary Elections

We also found the Postal Service’s Military DoS Ballot Report module for tracking the number of respective ballots (see Figure 9) was deemed “obsolete” by Postal Service managers. This system, however, was still collecting sporadic ballot information as of August 19, 2020.

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6 Mailings with purchased tracking services will be able to be tracked and recorded—ballots without these purchased services may not be tracked or recorded.
For the upcoming presidential election, Postal Service officials stated they plan to leverage existing tracking and reporting capabilities in the Product Tracking and Reporting system to track eligible election mail. For example, this system will collect data via the Intelligent Mail Barcode (IMb) or the Intelligent Mail Package Barcode (IMpb) on various scan events associated with the mailpieces and would be used to develop daily tracking reports. Such information would include, for example, when the ballot was entered into the mailstream (in the foreign country), when the corresponding receptacle (the ballot was nested in) landed...
in the U.S., when the receptacle was tendered to the Postal Service, and when the Postal Service removed the individual piece from the receptacle. System modification testing to specifically track and report on election ballots has not yet been completed, but is planned for early September 2020 at each ISC and other Postal Service facilities that could accept inbound ballots.

Recognizing the importance of these capabilities for this key mail segment as the election draws near and developing more rapid testing timeframes and procedures will allow more time to mitigate any implementation issues that may arise.

Accurately tracking and reporting on eligible international election ballots would not only provide the Postal Service key visibility into the number of international election ballots it receives, but it would also provide insight on the respective flows and timing of each piece — information that would be valuable for visibility into ballot processing and handling.

**Recommendation #3**
We recommend the Vice President, Processing and Maintenance Operations, develop and implement rapid testing timeframes and procedures for tracking and reporting on eligible inbound election ballots at each of the International Service Centers and other facilities that could accept international election mail.

**Management’s Comments**
Management largely agreed with the recommendations, but strongly disagreed with the finding that organizational changes and overtime restrictions were key contributors to the Chicago ISC’s delays. Management alleged the impact of suspended mail service to/from the United States and the loss of available air capacity on international operations was not fully reflected in this audit. Management stated the loss of air capacity caused a significant amount of unproductive re-handling of volume at the ISCs. Management also mentioned challenges associated with the accelerated rate at which inbound international routings began to open up – the resulting surge in volumes impacted the ISCs and created backlogs at freight facilities. Management also stated that origin countries did not always communicate inbound routings in advance, which contributed to delays. Management agreed that employee availability was a contributing factor to operational delays.

Regarding finding 1, management asked to clarify/correct some information. Regarding inbound containers, management stated the dates on the containers tracked in the airfield freight houses reflect the earliest date the mail was assigned in the originating country, not the date the container arrived in the United States. Regarding staffing shortages, management stated a significant number of employees have been hired and retained through improved hiring processes – management reported a net increase of 330 employees on the rolls from March 1 to August 1, 2020. Regarding transportation-related delays, management stated they spent considerable time and effort monitoring the dates of containers and following up with the ground handlers to ensure that any containers delayed in transit or storage were given priority.

Management partially agreed with recommendation 1. Management stated the Chicago ISC already has an operating plan but agreed a recovery plan to eliminate mail delays and address conditions is required. Management stated Postal Service Headquarters management began instituting a recovery plan, with recommendations to address identified operational deficiencies and related processing targets. Management stated specific milestones and responsibilities will be assigned to complete the plan and recommendation. The target implementation date is October 9, 2020.

Management agreed with recommendation 2. Management stated they started the process for developing a staffing contingency plan, and that Postal Service Headquarters has coordinated with field staff to identify and immediately replace all employees lost through attrition and extend hiring boundaries. Management also noted the establishment of weekly telecons to monitor and coordinate hiring.
for the Chicago ISC. Management reported an increase in the Chicago ISC craft employee complement and the supplemental employee hiring agreement with the unions was extended to December 31, 2020. Management also stated specific milestones and responsibilities will be assigned to complete the plan. The target implementation date is October 9, 2020.

Management partially agreed with recommendation 3. Management stated they began implementing a process for tracking outbound and inbound election mail in July 2020 and that they are in the process of completing the program. Management stated they are recording election ballot reports on its internal webpage (USPS Blueshare) and they will be instituting a daily report from each facility beginning on October 3, 2020. Management noted that inbound ballots from around the world can be routed to all five ISCs, and that mail for a particular ZIP Code could be commingled with mail for the entire United States. Management stated Automated Military Postal System and Product Tracking System tracking reports will begin on October 1, 2020, with weekly reporting until December 2020. Management also stated they will monitor ongoing processes and issues through stated daily internal reporting. Management noted that monitoring would be completed by December 1, 2020.

See Appendix E for management’s comments in their entirety.

Evaluation of Management’s Comments
The OIG considers management’s comments responsive to the recommendations in the report. Regarding management’s statement about the impact of organizational changes and overtime restrictions on delays at the Chicago ISC, we note that our report characterizes overtime restrictions as one of several causes for the delays. Further, evidence showed that efforts to reduce overtime exacerbated staffing shortages, as noted in our report. We included organizational changes as context in the report’s background but did not include as part of our findings, as management asserted.

Regarding management’s comments about the loss of airline capacity, we agree with their statement that a significant amount of unproductive re-handling of volume contributed to the delays and mentioned international service and transportation-related challenges in the report.

Regarding management’s comments about the container dates, while we agree there are different dates applicable to each inbound container, the way we depicted the container dates throughout our report was accurate. We also agree that management hired additional supplemental staff and coordinated with the cargo handlers, as described in our report.

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

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Appendix A: Additional Information

Scope and Methodology
Our objective was to evaluate the Postal Service’s preparedness for processing international election mail, including military and diplomatic mail. To accomplish our objective, we performed the following between June and September 2020:

- Reviewed Postal Service policies, procedures, roles, and responsibilities related to processing of international election mail, including military and diplomatic mail.
- Observed international election mail operations at the CIMSC; the Chicago, New York, Miami, and San Francisco ISCs; and the Dulles and San Francisco P&DCs.
- Reviewed Postal Service processing and operational plans for international election mail.
- Reviewed Postal Service international election and political mail data from the Postal Service’s EDW’s Military DoS Election Ballot report and other reports from the various ISCs. We also reviewed Chicago ISC employee availability and delayed mail data from the Delayed Dispatch, Mail Condition Visualization, Ramp, and Tour Turnover reports and discussed this data with local Postal Service officials.
- Interviewed Postal Service leadership at headquarters and managers at the Chicago, New York, Miami, and San Francisco ISCs; Honolulu, San Francisco, and Dulles P&DCs. These discussions included current preparedness for the upcoming election mailing season; performance thus far; political and election mail data and tracking; and risks/threats.
- Interviewed DoD and DoS officials about their perspectives of international military and diplomatic election mail.
- Reviewed past audit work from the Postal Service OIG, DoD OIG, and Government Accountability Office.
- Reviewed leading practices literature for preparing, and establishing contingencies, for critical operations.
- Performed an overarching assessment of the Postal Service’s compliance with current international military and diplomatic election mail processes and procedures.
- Performed an overarching assessment of the Postal Service’s preparedness for the upcoming election season based on the status of their current operations and the composition, details, and availability of their plans and contingencies.

We conducted this performance audit from June through September 2020 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 provide a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management on September 14, 2020, and included their comments where appropriate.

We assessed the reliability of national election and political mail data by reviewing the Military DoS Ballot Report in EDW and other ISC tracking reports. We also reviewed employee availability and delayed mail data at the Chicago ISC from the Delayed Dispatch, Mail Condition Visualization, Ramp, and Tour Turnover reports. We discussed this data with Postal Service officials and determined that the data were sufficiently reliable for the purposes of this report.
## Prior Audit Coverage

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<th>Report Number</th>
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<td>MS-AR-19-003</td>
<td>7/31/2019</td>
<td>None</td>
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Appendix B: International Military and Diplomatic Election and Political Mail Responsibilities

The Postal Service, DoD, and DoS each have responsibilities related to handling and processing this mail, and the processing flows vary for each type as shown by the general descriptions below:

- **Outbound election and political mail**: This mail is prepared by one of the domestic election or political organizations nationwide (which includes the estimated 8,880 election boards) – political mail would include a Tag 57, Political Campaign Mailing and election mail would include a Tag 191, Domestic and International Mail-In Ballots. These mailings are then tendered to the Postal Service. The Postal Service accepts the mail and routes it through one of its international facilities for outbound transportation (mostly the Chicago ISC). The mail is transported internationally and eventually tendered to DoD/DoS staff in the foreign country for final delivery to the customer.

- **Inbound military mail – absentee election ballots**: This mail is prepared in a foreign location and, upon receipt, DoD mail managers consolidate these pieces and place them into trays with a Tag 191, Domestic and International Mail-In Ballots. These trays are then eventually transported to either the Chicago ISC or Dulles P&DC where the ballots are extracted and sorted on the respective Postal Service equipment for processing in the domestic mail network for delivery to the respective local election office.

- **Inbound diplomatic mail – absentee election ballots**: This mail is prepared in a foreign location and the sender is supposed to affix a special Express Mail label. Upon receipt, DoS mail managers consolidate these pieces and segregate them in a dedicated Express Mail sack with a Tag 191, Domestic and International Mail-In Ballots. These sacks are then transported to the accepting Postal Service international exchange facility (such as the CIMSC), where the individual ballots are logged, recorded, and entered into the domestic Express Mail network for its eventual delivery to the respective local election office.

- **Inbound election mail – other (such as related election mail or materials but excludes ballots)**: These mailings generally follow normal inbound international mail flows and can include a Tag 191, Domestic and International Mail-In Ballots.
While the COVID-19 pandemic continues to have a profound impact on international mail operations and service, other factors outside of the Postal Service’s control also impact international mail service for Postal Service customers. In addition to service disruptions from foreign posts or unavailable transportation, other factors including mail class, mail preparation and entry, transportation, and security screenings can impact the timeliness, efficiency, and security of international political and election mail as follows:

■ **Mail class (as selected by the sender):** Different mail can have different timeliness standards and tracking services. For example, Express Mail has faster delivery times and more tracking capabilities when compared to First-Class Mail. The decision on which product to use is up to the mailer, such as the local election office or absentee voter. Inbound military absentee ballots for the national election in November 2020 are to be affixed with a special Express Mail label to ensure they receive expedited service and enhanced tracking.

■ **Mail entry timeliness (as entered by the sender or initial accepting organization):** Political and election mail should be tendered to the Postal Service in a manner to allow sufficient time for processing, transportation, and delivery. The Postal Service developed a strategy for reaching out to political and election mailers and posting related guidance on key mail entry timeframes on a variety of channels (see sidebar for specific guidance related to the transmission of international military ballots).³

■ **Mail preparation (as performed by the sender or initial accepting organization):** Political and election mail should be labeled accordingly to promote transparency throughout the Postal Service network. The extent to which mail preparers do not include these applicable labels or tags could hinder mail handling and processing.

■ **Airlines/transportation:** International transportation is complex and often entails a variety of stakeholders—from the airlines or shipping companies who transport the mail to the cargo or dock staff that handle the loading/unloading of the mail. The multiple layers to this transportation service (e.g., how quickly air or surface transportation space is available, how much capacity is available, or how quickly the mail is tendered to the Postal Service after arriving in the country) could impact service timeliness. The COVID-19 pandemic continues to disrupt international air transportation network operations and efficiency.

■ **Security screening:** Law enforcement entities, such as CBP or other federal agencies, can screen and inspect international mailings, which could impact timeliness and operations.

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³ The Postal Service’s Election Mail web page and its 2020 Official Election Mail Kit.
Postal Service data from mid-August 2020 showed nearly 11,000 parcels originally destined for foreign countries that could not be delivered due to a lack of outbound air transportation or the country not accepting U.S. mailings. See Table 1.

Table 1. Chicago ISC Delayed Outbound Mail

<table>
<thead>
<tr>
<th>Destinating Country</th>
<th>Kilograms</th>
<th>Pieces (converted)²</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sweden</td>
<td>1,099</td>
<td>2,892</td>
<td>Transportation unavailable</td>
</tr>
<tr>
<td>Austria</td>
<td>501</td>
<td>1,318</td>
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</tr>
<tr>
<td>Ghana</td>
<td>463</td>
<td>1,218</td>
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</tr>
<tr>
<td>Kenya</td>
<td>347</td>
<td>913</td>
<td>Transportation unavailable</td>
</tr>
<tr>
<td>Denmark</td>
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<td>716</td>
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<tr>
<td>Bosnia</td>
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</tr>
<tr>
<td>Lebanon</td>
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<tr>
<td>Estonia</td>
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<tr>
<td>Oman</td>
<td>115</td>
<td>303</td>
<td>Transportation unavailable</td>
</tr>
<tr>
<td>South Africa</td>
<td>95</td>
<td>250</td>
<td>Embargo</td>
</tr>
<tr>
<td>Kuwait</td>
<td>85</td>
<td>224</td>
<td>Transportation unavailable</td>
</tr>
<tr>
<td>Guatemala</td>
<td>82</td>
<td>216</td>
<td>u/a</td>
</tr>
<tr>
<td>Jordan</td>
<td>77</td>
<td>203</td>
<td>Embargo</td>
</tr>
<tr>
<td>Zambia</td>
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</tr>
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<td>Slovakia</td>
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</tr>
<tr>
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</tr>
<tr>
<td>Senegal</td>
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<td>87</td>
<td>Transportation unavailable</td>
</tr>
<tr>
<td>Destinating Country</td>
<td>Kilograms</td>
<td>Pieces (converted)(^a)</td>
<td>Reason</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------</td>
<td>--------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Chile</td>
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</tr>
<tr>
<td>Switzerland</td>
<td>31</td>
<td>82</td>
<td>Transportation unavailable</td>
</tr>
<tr>
<td>Mauritius</td>
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<td>Embargo</td>
</tr>
<tr>
<td>Cayman Islands</td>
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<td>55</td>
<td>Embargo</td>
</tr>
<tr>
<td>Laos</td>
<td>19</td>
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</tr>
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<td>Iraq</td>
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</tr>
<tr>
<td>Bolivia</td>
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<tr>
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<td>13</td>
<td>Embargo</td>
</tr>
<tr>
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<td>Embargo</td>
</tr>
<tr>
<td>Swaziland</td>
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<td>11</td>
<td>Transportation unavailable</td>
</tr>
<tr>
<td>Cambodia</td>
<td>2</td>
<td>5</td>
<td>Embargo</td>
</tr>
<tr>
<td>Ivory Coast</td>
<td>1</td>
<td>3</td>
<td>Embargo</td>
</tr>
<tr>
<td>Colombia</td>
<td>1</td>
<td>3</td>
<td>Transportation unavailable</td>
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<tr>
<td>Nepal</td>
<td>1</td>
<td>3</td>
<td>Transportation unavailable</td>
</tr>
<tr>
<td>India</td>
<td>1</td>
<td>3</td>
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</tr>
<tr>
<td>Brazil</td>
<td>1</td>
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<td>Transportation unavailable</td>
</tr>
<tr>
<td>Others</td>
<td>1</td>
<td>3</td>
<td>Mixed</td>
</tr>
</tbody>
</table>

**Total**  
4,093  
10,771

Source: U.S. Postal Service August 17, 2020, data and conversion factors.  
\(^a\) The Postal Service tracks these delays using kilograms and uses a 0.38 conversion factor to estimate the number of pieces (1 piece = 0.38 kilograms).
Appendix E: Management's Comments

September 25, 2020

LAZERICK POLAND
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Military, Diplomatic and Other International Election Mail
(Project Number 20-271 Draft)

Thank you for the opportunity to review and comment on the Office of Inspector General (OIG) audit, Military, Diplomatic and Other International Election Mail.

Management largely agrees with the audit's recommendations. However, Management strongly disagrees with the finding that organizational changes and restrictions on overtime were key contributors to the delays at the Chicago ISC.

The impact of a significant increase in countries with suspended service to/from the United States, and the loss of available air capacity due to cancelled flights has not been fully reflected in this audit. At its peak, the number of countries with service suspensions to the U.S. was over 110.

Prior to the international COVID-19 pandemic, the Postal Service had approximately 15,000 outbound routings available for international transit to foreign posts. During the peak of the pandemic, the available routings were reduced to under 2,000, an 87% reduction. As a result, there was inadequate capacity to transport international volume. This caused a significant amount of unproductive re-handling of volume in Chicago and the other four ISCs. Presently, available international routings are only up to approximately 4,000. In addition, inbound international routings began to open up at an accelerated rate in late May and June with a combination of commercial flights, dedicated air freighters and container ships, causing a surge in import volume to all ISCs, including Chicago, with dedicated air freighters routed primarily to Chicago and JFK. This not only impacted the ISCs, but also created a backlog at the freight houses, exceeding their capacity to tender volume due to staffing shortages caused by a combination of COVID impacts and the surge in volume. In addition, these inbound routings were not always communicated in advance by the origin countries, contributing to the delays.
Management agrees that employee availability was also a contributing factor as noted. However, overtime restrictions were not the primary cause and organizational changes had no impact on the operations in the Chicago ISC.

**FINDING #1**

The Postal Service would like to clarify/correct the findings in the following sections of Finding #1.

**Inbound:** The dates on containers tracked in the airfield freight houses are the earliest date that the mail was assigned in the country of origin, not the date that the container arrived in the United States. There have been a number of instances where containers assigned in the country of origin arrived in the U.S. 30 to 60 days after the mail was assigned due to delays in transit at the country of origin into the U.S.

**Staffing shortages:** Although the Chicago ISC has incurred impacts to employee availability due to COVID-19, a significant number of employees have been hired and retained through improved hiring processes. This has resulted in a net increase in staffing of 330 employees on rolls from March 1, 2020 to August 1, 2020. Mail Processing overtime in the Chicago ISC averaged 5,400 hours per week at a rate of 12% from the weeks of June 1, 2020 through August 29, 2020. Overtime was +9% over same period last year for the month of August.

**Transportation-related delays:** As noted above, the dates on containers tracked in the airfield freight houses are the earliest date that the mail is assigned in the country of origin, not the date that the container arrived in the United States. There have been a number of instances where containers assigned in the country of origin arrived in the U.S. 30 to 60 days after the mail was assigned due to delays in transit at the country of origin into the U.S. In addition, an extensive amount of time and effort has been made continually monitoring the dates of all containers in the airfield freight houses at the Chicago ISC and following up with the respective ground handlers by the USPS Director of International Processing Operations and local manager of transportation to ensure containers are pulled on a first-in first-out basis, and that any containers delayed in transit are given priority based on the date the mail was assigned in the country of origin.

**Recommendation #1:**

OIG recommends that Vice President of Processing and Maintenance Operations immediately develop and implement a Short-Term Operating Plan, including strategies, milestones and responsibilities to process the mail inventory backlog and ensure the timely processing and handling of international outbound and inbound election mail.

Management partially agrees with this recommendation. The Chicago ISC has an Operating Plan. However, we agree that a recovery plan to eliminate the mail...
delays and address conditions with strategies, milestones and assigned responsibilities is required. HQ Management began instituting the recovery plan in July with a full operational review of the Chicago ISC and a scored status report covering the completion and status of all identified operational deficiencies and recommendations. In addition, processing targets have been set and are tracked by tour/shift for all major operations. Specific milestones and responsibilities will be assigned to complete the plan and recommendation.

**Target Completion Date:**
October 9, 2020

**Responsible Official:**
Jeffrey Becker, Director International Processing Operations

**Recommendation #2**
OIG recommends the Vice President Processing and Maintenance Operations immediately develop and implement a Staffing Contingency Plan with strategies and responsibilities for ensuring the sufficient availability of staff for the upcoming elections cycle, including options in case supplemental staff levels would be limited after the expiration of the current agreements in September.

Management agrees with this recommendation. The Postal Service has started this process and will be complete by October 9, 2020. Postal Service Headquarters has coordinated with the Area Manager of Human Resources and Chicago ISC to identify and immediately replace all employees that are lost through attrition, and extend hiring for the Chicago ISC to the Central Illinois District in addition to the Chicago District. Weekly telecons are also being established between Headquarters, Area Manager of Human Resources, the Chicago ISC, and the Chicago and Central Illinois Districts to monitor and coordinate hiring for the ISC. To date, the number of Chicago ISC craft employees on-rolls have been increased by 517 employees, from 1,278 on March 1st to 1,795 as of September 19th.

The supplemental employee hiring agreement with the unions has been extended to December 31, 2020.

Specific milestones and responsibilities will be assigned to complete the plan.

**Target Completion Date:**
October 9, 2020

**Responsible Official:**
Jeffrey Becker, Director International Processing Operations
Recommendation #3:
OIG recommends that Vice President of Processing and Maintenance Operations develop and implement rapid testing timeframes and procedures for tracking and reporting on eligible inbound election ballots at each of the ISCs and other facilities that could accept international election mail.

Management partially agrees with Recommendation #3. The Postal Service developed a tracking process for Election mail and began implementation in July, 2020.

Management is in the process of completing implementation of this program that tracks Outbound and Inbound election mail. The program is located in IV/Qlik and provides visibility regarding the volume of ballots flowing back into facilities across the country. A screenshot for Chicago ISC is attached below. This report continues to be developed to provide additional diagnostics into the visibility of election mail, including ballots, both Inbound and Outbound, for both domestic and international. Displayed below is an example for the Chicago ISC.

Additionally, an “All-Clear” for Election Ballots is recorded daily on the USPS Blueshare page. Prior to this process, a manual email entry was in place, which was eliminated and changed to the Blueshare report on September 14, 2020.
When the Chicago ISC receives ballots they are collected and dispatched to the Palatine IL P&DC for processing. A “Pitch & Catch” daily report out from each facility will begin October 3, 2020. Each Processing & Distribution Center has the “Election Mail All Clear Process” they follow for verification of processing and clearance of Election Mail, including ballots.

Note: Inbound ballots from around the world are routed to all 5 ISCs depending on the location of the destination Board of Elections for the individual Absentee Ballot. Below is the guidance given to FPA’s (Foreign Postal Administrations) for inbound mail to the United States. Although the USPS supplies this ZIP Code ISC assignment listing, there is no mandate that mail enter via the respective ISC assigned for the ZIP Code range, and many FPAs do not separate their export letters/flats by destination postal code. Mail is frequently comingled for the entire country. Oftentimes, mail entry to a particular foreign office of exchange (OE) is driven more by available flights and lift from the origin posts rather than the destination ZIP Code.

Specific to the Label 11-DOD tracking:
Upon arrival at the ISC, the Priority Mail Express (PME 11-DoD) for Uniformed and Overseas Citizens Absentee Voting (UOCAVA) eligible (Department of Defense DoD / Department of State DoS) voters is segregated and documented at induction. International Logistics collaborates with the Department of Defense (DoD) and Department of State (DoS) in reviewing that the cancellation and preparation of ballots has been correctly done. The Priority Mail Express will then be transported to the domestic Night Turn Priority Mail Express network and tracked to delivery.

The DoD feeds 11-DoD data via Automated Military Postal System (AMPS) and the Department of State feeds data via Integrated Logistics Management System (ILMS) to the USPS Product Tracking Reporting (PTR) system where it is tracked end to end (E2E).

AMPS and PTR tracking reports will begin October 1, 2020 with weekly reporting until December 1, 2020. Internal reporting is conducted daily to monitor on-going processes to identify any potential issues in a timely manner for immediate corrective action.

**Target Completion Date:**
Completed.
11-DOD end of monitoring will be completed by 12/1/2020.

**Responsible Official:**
Jeffrey Becker, Director International Processing Operations
Claire Perez Redondo, Director

Mike L. Barber

cc: Manager, Corporate Audit Response Management
    Director International Operations
    Director International Logistics
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