



Office of Inspector General | United States Postal Service

## Audit Report

# Mercury Mailability Communication and Implementation

Report Number 20-103-R20 | July 17, 2020



# Table of Contents

- Cover
- Highlights..... 1
  - Objective ..... 1
  - Finding..... 2
  - Recommendations..... 2
- Transmittal Letter ..... 3
- Results..... 4
  - Introduction/Objective ..... 4
  - Background..... 4
  - Finding #1: Mercury Mailability Communication and Implementation..... 5
    - Recommendation #1..... 8
    - Recommendation #2..... 8
  - Management’s Comments..... 8
  - Evaluation of Management’s Comments ..... 8
- Appendices ..... 9
  - Appendix A: Additional Information..... 10
    - Scope and Methodology..... 10
    - Prior Audit Coverage ..... 11
  - Appendix B: Mystery Shop Results..... 12
  - Appendix C: Management’s Comments..... 15
- Contact Information ..... 17

# Highlights

## Objective

Our objective was to assess the effectiveness of the internal communication and implementation of mercury mailability policy changes.

The U.S. Postal Service revised its mercury mailability policies in March of 2019 as a result of mercury spills at various mail processing plants throughout the country. The *Postal Service* made notable changes to its *Publication 52, Hazardous, Restricted, and Perishable Mail*, regarding the amount and type of items containing mercury that can be mailed. For example, devices containing metallic mercury, such as thermometers or barometers, were designated as “nonmailable”.

The Postal Service made other operational changes to align with these policy updates. Specifically, in August 2019, “mercury” was added to the hazardous materials (HAZMAT) question that Postal Service employees at retail windows are required to ask customers attempting to mail packages. The updated HAZMAT question is “*Do any of your articles contain anything liquid, fragile, perishable or potentially hazardous, such as lithium batteries, perfume or mercury?*”

As management finalized these policy and operational, Postal Service leadership across multiple organizations (such as Corporate Communications, Delivery and Retail Operations, and Labor Relations) developed the following:

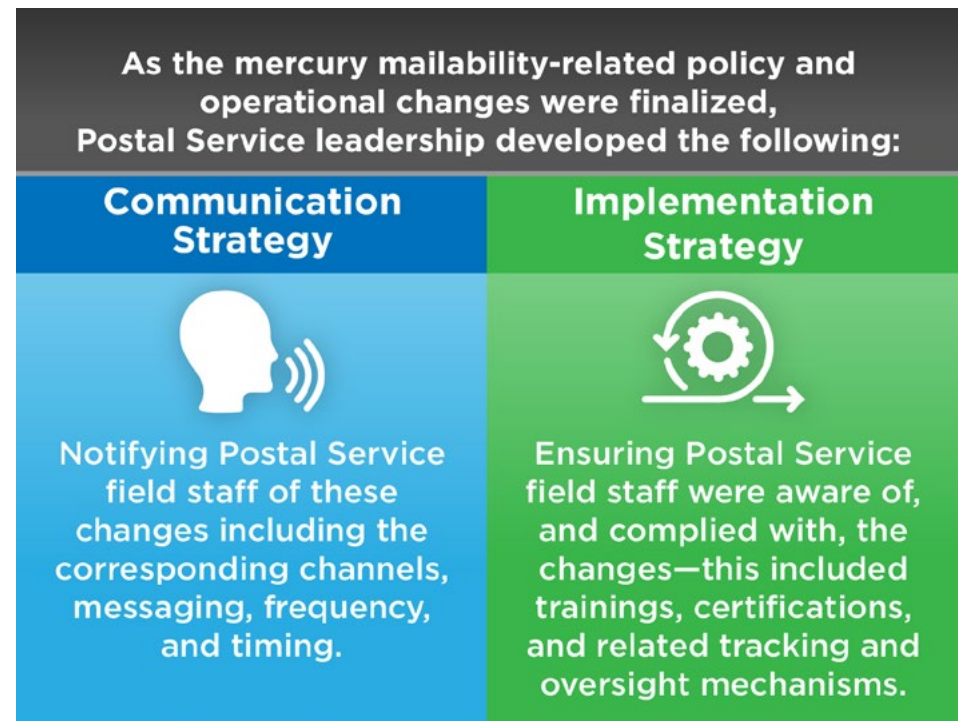
- *Communication strategy* for notifying Postal Service field staff of these changes including the corresponding channels (for example, emails, stand-up talks, bulletins, videos), messaging, frequency, and timing.
- *Implementation strategy* for ensuring Postal Service field staff are aware of and compliance with the changes – this included trainings, certifications, and related tracking and oversight mechanisms.

Postal Service Headquarters staff from Corporate Communications and Delivery and Retail Operations managed the communication and distribution of information related to these changes to Postal Service staff throughout the field. The changes were published in a variety of channels such as the Postal Service’s internal website, *USPS Link*, *Postal Pro*, *Postal Bulletin*, *Retail Digest*,

*Consumer Advocate Newsletter*, emails, and memos. These changes were also communicated through stand-up talks, videos, and teleconferences.

Postal Service field staff used a variety of mechanisms to monitor implementation of these changes. These mechanisms included certifications for staff and supervisors to verify they were provided applicable information and training; mystery shops by internal staff or external contractors; and supervisory observations of individual transactions recorded on Postal Service Form 4000-B, *Retail Employee Observation*.

Our fieldwork was completed before the President of the United States issued the national emergency declaration concerning the novel coronavirus disease outbreak on March 13, 2020. The results of this audit do not reflect process and/or operational changes that occurred as a result of the pandemic.



## Finding

The Postal Service's communication of mercury mailability changes needs improvement to ensure consistent application across all retail locations. We noted employees at 18 of 38 (47 percent) randomly selected retail units we visited improperly accepted our test packages. The employees at five of these locations did not ask the required HAZMAT question and the employees at four of these locations incorrectly asked the question by omitting any reference to mercury.

Local management and staff attributed the improper package acceptance primarily to confusion about the current policy over mercury mailability. Employees at 12 of the units mistakenly accepted test packages incorrectly assuming the items could be accepted and shipped via the Postal Service's ground network. Some field management and staff we spoke with noted the infrequent nature of these transaction (i.e., mercury mailings are relatively infrequent) and a focus on customer service are likely contributing factors to improper package acceptance.

Targeted communication improvements related to mercury mailability standards, such as reminding staff of the standards or developing a quickly accessible reference tool or mechanism summarizing them, could help alleviate confusion and promote expediency.

Leading practices suggest reference tools or job aids could help window employees with these types of transactions (for example, infrequent, complex, or safety/security-related). The Postal Service could implement such tools nationally, such as visual prompts on the window employee's retail monitor displaying the key points of the Postal Service's mercury mailability policy. These actions, along with existing mechanisms for assessing compliance, such as the mystery shops and other training, would aid in effective and consistent implementation of important policies.

Continued deficiencies in the application of the mercury mailability standards pose increased safety, security, operational, and brand risks to the Postal Service as recent mercury spills at plants across the country had a damaging effect on employees, operations, and mail service.

## Recommendations

We recommended management:

- Develop a communication strategy to remind field staff of the mercury mailability policy changes.
- Develop a reference tool or mechanism summarizing the mercury mailability standards that retail window employees can quickly and efficiently access when approached by a customer attempting to mail mercury.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

July 17, 2020

**MEMORANDUM FOR:** JANICE WALKER  
VICE PRESIDENT, CORPORATE COMMUNICATIONS  
  
KEVIN MCADAMS  
VICE PRESIDENT, DELIVERY AND RETAIL OPERATIONS

A digital signature of Janet M. Sorensen, showing her name in a cursive script. Above the signature, the name "Janet Sorensen" is printed in a small font. To the right of the signature is a small yellow icon of a document with a checkmark.

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

**SUBJECT:** Audit Report – Mercury Mailability Communication and  
Implementation (Report Number 20-103-R20)

This report presents the results of our audit of Mercury Mailability Communication and Implementation.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Joseph Wolski, Director, Sales, Marketing and International, 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 Mercury Mailability Communication and Implementation (Project Number 20-103). Our objective was to assess the effectiveness of the internal communication and implementation of mercury mailability policy changes. See [Appendix A](#) for additional information.

Our fieldwork was completed before the President of the United States issued the national emergency declaration concerning the novel coronavirus disease outbreak (COVID-19) on March 13, 2020. The results of this audit do not reflect operational changes or service impacts that may have occurred throughout the U.S. Postal Service's operational network as a result of the pandemic.

## Background

The Postal Service recently experienced a range of mercury spills at various mail processing plants throughout the country, in places such as ME, North TX, upstate NY, Western PA, and Puerto Rico. These spills had a damaging effect on Postal Service employees and operations as plants were shut down and mail service halted.

The Postal Service revised mercury mailability policies in its *Publication 52, Hazardous, Restricted, and Perishable Mail* in March of 2019. Specific changes were made to the amount and type of items containing mercury that could be mailed — for example, devices containing metallic mercury, such as thermometers or barometers, were designated as “nonmailable”.

The Postal Service made other operational changes to align with these policy updates. Specifically, in August 2019, “mercury” was added to the hazardous materials (HAZMAT) question that Postal Service employees at retail windows are required to ask customers

attempting to mail packages. The updated HAZMAT question is “*Do any of your articles contain anything liquid, fragile, perishable or potentially hazardous, such as lithium batteries, perfume or mercury?*”

As these policy and operational changes were finalized, Postal Service leadership across multiple organizations (such as Corporate Communications, Delivery and Retail Operations, and Labor Relations) developed the following:

- *Communication strategy* for notifying Postal Service field staff (those at the area, district, and local levels) of these changes and determining the following:
  - Channels – the mechanisms for conveying messages can include emails, newsletters, videos, memos, or teleconferences.
  - Messaging – the detail, descriptions, format, and presentation of the messaging.
  - Frequency – how often the messaging is communicated.
  - Timing – the timing of the messaging, including how much lead time is provided between messaging and implementation.
- *Implementation strategy* for ensuring Postal Service field staff are aware of and complying with the changes, including trainings, certifications, and related tracking and oversight mechanisms.

Postal Service Headquarters staff from Corporate Communications and Delivery and Retail Operations managed the communication and distribution of information related to these mercury mailability changes to Postal Service staff throughout the field. The changes were published in a variety of channels such as the Postal Service's internal website, *USPS Link*, *Postal Pro*, *Postal Bulletin*, *Retail Digest*, *Consumer Advocate Newsletter*, emails, and memos (see example in [Figure 1](#)). These changes were also communicated through stand-up talks, videos, and teleconferences.

---

***“The Postal Service revised its mercury mailability policies contained in Postal Service Publication 52, Hazardous, Restricted, and Perishable Mail in March of 2019.”***

---

Figure 1. USPS Link Article on Mercury Mailability

# LINK

News

## Mercury in the mail

USPS offers reminder about parcels

April 23, 2019 at 10:17 a.m.


The Postal Service is reminding employees that mercury metal and devices containing mercury metal are always prohibited from mailing.

This includes antique items such as thermometers, barometers, blood pressure meters and similar devices. Generally, this doesn't include newer types of these devices, especially digital versions.

According to [Publication 52, Hazardous, Restricted and Perishable Mail](#), devices that contain mercury metal shouldn't be confused with "manufactured devices that contain small amounts of mercury (UN3506)," such as compact fluorescent lamps, fluorescent tubes and similar consumer devices containing minute amounts of mercury. The mercury contained in these devices generally exists in a vaporized state, and will never be visible to the naked eye.

Publication 52, available on the [Postal Explorer site](#), has complete information about mailing requirements for parcels that contain mercury.

USPS recently distributed a [DMM Advisory](#) with a reminder for employees. Employees who have questions should talk to a manager or supervisor.



Mercury metal and devices containing mercury metal are always prohibited from mailing

Source: U.S. Postal Service Office of Inspector General (OIG) screenshot of April 23, 2019, USPS Link.

Postal Service field staff then used a variety of mechanisms to monitor implementation of these changes. These mechanisms included certifications for staff and supervisors to verify they were provided applicable information and training; mystery shops by internal staff or external contractors; and supervisory

observations of individual transactions recorded on Postal Service Form 4000-B, Retail Employee Observation.

### Finding #1: Mercury Mailability Communication and Implementation

We noted window employees<sup>1</sup> at 18 of 38 units (47 percent) improperly accepted our test packages (see [Table 1](#) and sidebar). Employees at five of the locations did not ask the required HAZMAT question and employees at four of the locations incorrectly asked the question by omitting any reference to mercury. There were also no material performance differences between urban or rural units — 11 of 25 (44 percent) employees in urban offices failed the test by accepting the test package, while seven of 13 (54 percent) employees in rural offices failed the test.<sup>2</sup>

*“The Postal Service’s communication of mercury mailability changes needs improvement to ensure consistent application across all retail locations.”*

### OIG Mystery Shops

We tried to mail a package containing nonmailable mercury thermometers (the packages did not actually contain mercury) and if the employee rejected the package, we considered that a “passing” transaction; if the employee accepted the package, we considered that a “failing” transaction. We also tested to see if the employee asked the required HAZMAT question.

1 We used the term “employee” or “window employee” throughout this report to reflect the Postal Service clerk, supervisor, postmaster, or other Postal Service staff who conducted the transaction at the retail window. We randomly selected retail units for mystery shops within each of the Postal Service’s seven geographic area offices.

2 See [Appendix B](#) for complete results of our mystery shops.

**Table 1. Failed Mercury Mailability Mystery Shops**

Retail Unit	Urban or Rural	Result – Mystery Shop	Result – HAZMAT Question <sup>a</sup>
<b>Albany District – Northeast Area</b>			
East Berne	Rural	Accepted - Fail	Not Asked
Feura Bush	Rural	Accepted - Fail	Not Asked
Glenmont	Urban	Accepted - Fail	Asked Correctly
<b>Colorado/Wyoming District – Western Area</b>			
Eagleview Broomfield	Urban	Accepted - Fail	Asked Incorrectly
Harris Park	Urban	Accepted - Fail	Asked Correctly
<b>Greater Michigan District – Great Lakes Area</b>			
Centerpointe	Urban	Accepted - Fail	Asked Correctly
Hickory Corners	Rural	Accepted - Fail	Not Asked
<b>Ohio Valley District – Eastern Area</b>			
Burlington	Rural	Accepted - Fail	Asked Correctly
<b>Richmond District – Capital Metro Area</b>			
East End	Urban	Accepted - Fail	Asked Correctly
Northside	Urban	Accepted - Fail	Not Asked
Providence Forge	Rural	Accepted - Fail	Asked Incorrectly
Regency	Urban	Accepted - Fail	Asked Correctly
Towne Center	Urban	Accepted - Fail	Asked Correctly
<b>San Diego District – Pacific Area</b>			
Brooks Street	Urban	Accepted - Fail	Asked Incorrectly
First Street	Urban	Accepted - Fail	Asked Incorrectly
Valley Center	Rural	Accepted - Fail	Asked Correctly
<b>Suncoast District – Southern Area</b>			
Balm	Rural	Accepted - Fail	Not Asked
Lithia	Urban	Accepted - Fail	Asked Correctly

Source: OIG mystery shop visits.

<sup>a</sup> The categories were (1) “Asked Correctly” where the employee asked the HAZMAT question correctly, (2) “Asked Incorrectly” where the employee asked a HAZMAT question, but the question was incorrect – the employee omitted the word “mercury”, and (3) “Not Asked” where the employee did not ask the HAZMAT question.



We discussed these results with Postal Service management and staff at various levels throughout the organization — headquarters, areas, districts, and local units. Local management and staff at the units where employees failed our tests primarily attributed the improper package acceptance to confusion with the current mercury mailability policy.

***“Local management and staff at the units where employees failed our tests primarily attributed the improper package acceptance to confusion with the current mercury mailability policy.”***

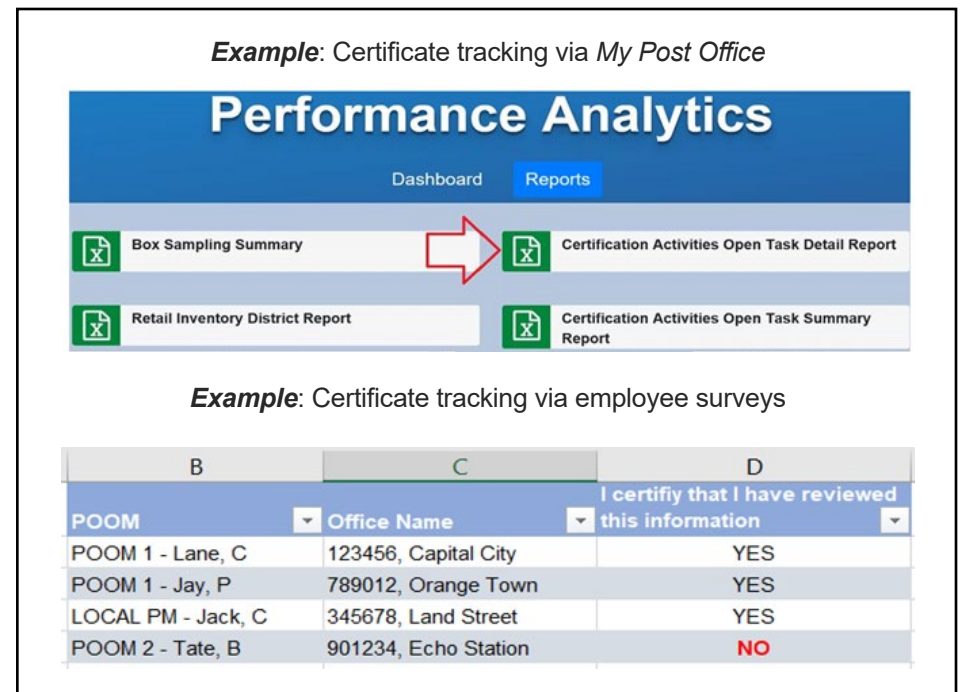
Window employees at 12 of the units mistakenly accepted the test package after asking a HAZMAT question incorrectly assumed these items could be accepted and shipped via the Postal Service’s ground network. Some field management and staff (those in the areas, districts, and local units) we spoke with noted the infrequent nature of these transaction (i.e., mercury mailings are relatively infrequent) and a focus on customer service (i.e., trying to reduce customer wait-time-in-line) are likely contributing factors to improper package acceptance.

Postal Service field management and staff also spoke of positive aspects of the communication and implementation strategies for these mercury mailability changes. They consistently stated they viewed the communication of information from headquarters and their respective supervisors on these mercury mailability changes as sufficient (for example, district staff stated they received sufficient information from the area and local managers stated they received sufficient information from the district).

Managers in the field often supplemented the information provided with their own communication strategies, such as teleconferences, stand-up talks, memos, or emails. The field staff also stated they had sufficient flexibility to customize their respective communication — for example, if a certain district wanted to use more stand-up talks or add additional training/instruction, they could do so.

The field staff also stated they used a range of mechanisms, such as required online training, completion logs, certifications, supervisory signoffs, and their own mystery shops, to ensure employees were aware of the respective changes and to hold managers and leadership accountable. For example, district staff provided examples of using reporting modules in My Post Office or other survey programs to track employee certifications (see Figure 2).

**Figure 2. Example of Tracking Mechanisms**



Source: OIG summaries of district information.

Postal Service management and staff at headquarters and in the field raised concerns regarding the mystery shop results and recognized the need for more consistent application. Targeted communication improvements related to the mercury mailability standards, such as reminding window employees of the mercury mailability standards or developing a quickly accessible reference tool

or mechanism that summarizes the mailability standards, could help alleviate confusion and promote expediency.

Leading practices suggest reference tools or job aids could help employees with these types of transactions (for example, infrequent, complex, or safety/security-related).<sup>3</sup> The Postal Service could implement such tools nationally, by adding visual prompts to the window of the employee's retail monitor displaying the key points of the Postal Service's mercury mailability policy. These actions, along with existing mechanisms for assessing compliance such as the mystery shops and other training, would aid in the effective and consistent implementation of important policies.

Continued deficiencies in the application of the mercury mailability standards pose increased safety, security, operational, and brand risks to the Postal Service.

### **Recommendation #1**

We recommend the **Vice President, Corporate Communications, and the Vice President, Delivery and Retail Operations**, develop a communication strategy to remind field staff of the mercury mailability policy changes.

### **Recommendation #2**

We recommend the **Vice President, Corporate Communications, and the Vice President, Delivery and Retail Operations** develop a reference tool or mechanism summarizing the mercury mailability standards that retail window employees can quickly and efficiently access when approached by a customer attempting to mail mercury.

## **Management's Comments**

Management agreed with the report's finding and recommendations.

Regarding recommendation 1, management stated they will continue educating employees on mercury mailability guidelines and developing communication tools to reinforce the dissemination of relevant information to all retail units. The target implementation date is October 31, 2020.

Regarding recommendation 2, management stated that employees have a variety of tools that summarize mercury mailability standards and that they will reinforce employee knowledge by presenting mercury-specific scenarios in their Retail Customer Experience (RCE) evaluation program. The target implementation date is October 31, 2020.

See [Appendix C](#) 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.

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.

<sup>3</sup> [Appendix A](#) contains additional information on these leading practices.

# Appendices

Click on the appendix title below to navigate to the section content.

Appendix A: Additional Information.....	10
Scope and Methodology .....	10
Prior Audit Coverage .....	11
Appendix B: Mystery Shop Results.....	12
Appendix C: Management’s Comments.....	15

# Appendix A: Additional Information

## Scope and Methodology

Our objective was to assess the effectiveness of the internal communication and implementation of mercury mailability policy changes. To accomplish our objective, we

- Reviewed the overall framework for internally communicating and implementing mercury mailability policy changes from headquarters throughout the field. This included reviewing relevant strategies, policies, procedures, roles, and responsibilities.
- Reviewed the various channels used by the Postal Service to communicate mercury mailability changes throughout the network, such as *Postal Pro*, *Postal Bulletin*, *Retail Digest*, *Consumer Advocate Newsletter*, and *USPS Link*, as well as other components of their communication strategy related to messaging, timeliness, and frequency.
- Reviewed various strategies used by the Postal Service to ensure that Postal Service staff were aware of, and in compliance with, the respective mercury mailability policy changes, including trainings, certifications, and related tracking and oversight mechanisms.
- Performed mystery shops at select retail units in urban and rural locations throughout the country to selectively test the effectiveness of the communication and implementation strategies related to the mercury mailability changes. We randomly selected one district within each of the seven Postal Service areas. We then, randomly selected a mix of urban and rural retail units within a 30-mile radius of the address of the district office adding ten retail sites that appeared along the line of travel or had supervisors that were responsible for the smaller units we visited. We used the Postal Service's Retail Data Mart and Facilities Database for retail unit information (such as unit name, address, and ZIP Code) and U.S. Census Bureau information on ZIP Code urban and rural designations.

We performed mystery shop tests of mercury mailability at 38 units between October 2019 and February 2020.<sup>4</sup> The mercury mailability test entailed trying to mail a package containing thermometers — a nonmailable mercury according to Section 348.21 of *Publication 52*. If the window employee rejected the package, we considered that a “passed” transaction; if the employee accepted the package, we considered that a “failed” transaction. We also tested additional aspects of this transaction, such as if the window employee correctly asked the required HAZMAT question— “*Do any of your articles contain anything liquid, fragile, perishable or potentially hazardous, such as lithium batteries, perfume or mercury.*”

We also conducted follow-up interviews with the supervisors or postmasters at 33<sup>5</sup> of these locations, discussing the results of our mystery shops in their locations and their perspectives, roles, and activities in the communication and implementation of the mercury mailability changes.

- Interviewed managers at Postal Service Headquarters, the seven areas, and the seven districts about the results of our mystery shops in their locations and their perspectives, roles, and activities in the communication and implementation of the mercury mailability changes.
- Reviewed customer complaints in the Postal Service's Enterprise Customer Cares system related to mercury mailability.
- Reviewed literature from Gartner, Forbes, and other sources related to leading practices for effectively communicating and implementing operational changes throughout an organization. We also met with representatives from Gartner to discuss these leading practices in more detail.

We conducted this performance audit from October 2019 through July 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

<sup>4</sup> We did not conduct any mystery shops between late November and early January due to the holiday mailing season.

<sup>5</sup> We conducted interviews at 33 of the 38 mystery shopped units due to reasons including there were not supervisors on-site (in these instances, we went to the site where the respective supervisor was located) or other timing issues.

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 June 3, 2020, and included their comments where appropriate.

We assessed the reliability of the computer-generated data we collected from the Postal Service's Retail Data Mart, Facilities Database, and Enterprise Customer

Care system by reviewing the data for errors and discussing potential issues with Postal Service officials. We determined that the data were sufficiently reliable for the purposes of this report.

### **Prior Audit Coverage**

The OIG did not identify any prior audits or reviews related to the objective of this audit within the last five years.

# Appendix B: Mystery Shop Results

We performed mystery shop tests of mercury mailability at 38 retail units between October 2019 and February 2020 (see Table 2).

**Table 2. Mercury Mailability Mystery Shop Results**

Retail Unit	Urban or Rural	Result – Accept or Reject Package	Result – HAZMAT Question <sup>a</sup>
<b>Albany District – Northeast Area</b>			
Colonie Center	Urban	Rejected - Pass	Asked Correctly
Delmar	Urban	Rejected - Pass	Asked Correctly
East Berne	Rural	Accepted - Fail	Not Asked
Feura Bush	Rural	Accepted - Fail	Not Asked
Glenmont	Urban	Accepted - Fail	Asked Correctly
<b>Colorado/Wyoming District – Western Area</b>			
Eagleview Broomfield	Urban	Accepted - Fail	Asked Incorrectly
Eastlake	Urban	Rejected - Pass	Not Asked <sup>b</sup>
Golden	Urban	Rejected - Pass	Asked Correctly
Harris Park	Urban	Accepted - Fail	Asked Correctly
Idledale	Rural	Rejected - Pass	Asked Correctly
Indian Hills	Rural	Rejected - Pass	Asked Correctly
Westminster	Urban	Rejected - Pass	Not Asked <sup>b</sup>
<b>Greater Michigan District – Great Lakes Area</b>			
Caledonia	Urban	Rejected - Pass	Asked Correctly
Centerpointe	Urban	Accepted - Fail	Asked Correctly
Hickory Corners	Rural	Accepted - Fail	Not Asked
Stanton	Rural	Rejected - Pass	Asked Correctly

Retail Unit	Urban or Rural	Result – Accept or Reject Package	Result – HAZMAT Question <sup>a</sup>
<b>Ohio Valley District – Eastern Area</b>			
Burlington	Rural	Accepted - Fail	Asked Correctly
Harrison	Urban	Rejected - Pass	Asked Correctly
Hebron	Urban	Rejected - Pass	Asked Correctly
Petersburg	Rural	Rejected - Pass	Asked Correctly
Taft	Urban	Rejected - Pass	Asked Correctly
Westwood	Urban	Rejected - Pass	Asked Correctly
<b>Richmond District – Capital Metro Area</b>			
East End	Urban	Accepted - Fail	Asked Correctly
Northside	Urban	Accepted - Fail	Not Asked
Providence Forge	Rural	Accepted - Fail	Asked Incorrectly
Quinton	Rural	Rejected - Pass	Asked Correctly
Regency	Urban	Accepted - Fail	Asked Correctly
Towne Center	Urban	Accepted - Fail	Asked Correctly
<b>San Diego District – Pacific Area</b>			
Brooks Street	Urban	Accepted - Fail	Asked Incorrectly
First Street	Urban	Accepted - Fail	Asked Incorrectly
Rancho Del Rey	Urban	Rejected - Pass	Asked Correctly
Valley Center	Rural	Accepted - Fail	Asked Correctly
William Taft	Urban	Rejected - Pass	Asked Incorrectly <sup>c</sup>

Retail Unit	Urban or Rural	Result – Accept or Reject Package	Result – HAZMAT Question <sup>a</sup>
<b>Suncoast District – Southern Area</b>			
Balm	Rural	Accepted - Fail	Not Asked
Durant	Rural	Rejected - Pass	Asked Correctly
Lithia	Urban	Accepted - Fail	Asked Correctly
Sun City Center	Urban	Rejected - Pass	Asked Correctly
Wimauma	Urban	Rejected - Pass	Asked Correctly

Source: OIG mystery shop visits.

<sup>a</sup> The categories were (1) “Asked Correctly” where the employee asked the HAZMAT question correctly, (2) “Asked Incorrectly” where the employee asked a HAZMAT question, but the question was incorrect – the employee omitted the word “mercury”, and (3) “Not Asked” where the employee did not verbally ask the HAZMAT question.

<sup>b</sup> The employee at these locations did not ask the HAZMAT question, but subsequently rejected the package after the mystery shopper indicated they had a package containing mercury when completing the transaction on the RSS terminal.

<sup>c</sup> The employee at this location asked a HAZMAT question, but the question was incorrect – the employee omitted the word “mercury”. When the mystery shopper replied their package contained mercury, the employee subsequently rejected the package.

The results of these mystery shops as broken down by urban and rural designation show that 11 of 25 (44 percent) employees in urban offices failed the mercury mailability test by accepting the test package, while seven of 13 (54 percent) employees in rural offices failed this test (see Table 3).

**Table 3. Mercury Mailability Mystery Shop Results, by Urban/Rural Designation**

Result	Urban	Rural	Total
Pass	14	6	<b>20</b>
Fail	11	7	<b>18</b>
<b>Total</b>	<b>25</b>	<b>13</b>	<b>38</b>

Source: OIG mystery shop visits.



# Appendix C: Management's Comments



July 6, 2020

LAZERICK C. POLAND  
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Mercury Mailability Communication and Implementation  
Project Number: 20-103-DRAFT

Thank you for providing the Postal Service with an opportunity to review and comment on the Audit, "Mercury Mailability Communication and Implementation" Project Number: 20-103-DRAFT.

Management is aware of the risk that mercury poses to the safety, security and brand image of the Postal Service when employees do not follow proper HAZMAT procedures.

This report is based on the results of Mystery Shops conducted by the Office of Inspector General (OIG) and does not indicate the specific verbiage concerning Mercury mailability that was used during the "shops" and if the mail pieces (thermometers) were declared as containing mercury or not. Most thermometers are either digital or alcohol based and can be safely accepted into the mailstream.

Postal management acknowledges the report referenced its efforts to communicate the recent mercury policy changes. There were additional key strategic measures that were not referenced in the report including:

- August 2019: Deployment of Retail Systems Software (RSS) technology changes involving screen prompts for both employees and customers
- October 2019: Inclusion of mercury in the fiscal year (FY) 2020 Retail Customer Experience evaluations. (More than 60,000 evaluations conducted in FY 2019.)
- November 2019: Deployment of online accessibility to Publication 52, *Hazardous, Restricted and Perishable Mail*, via RSS technology
- November 2019: Launch of the HAZMAT Awareness Campaign with references to mercury acceptance and policy changes.

Management is committed to safeguarding its employees and customers through a rigid oversight of all aspects of mail piece acceptance.

**Recommendation 1:**

We recommend the vice presidents of Corporate Communications, and Delivery and Retail Operations develop a communication strategy to remind field staff of the mercury mailability policy changes.

**Management Response/Action Plan: Agree**

Management will continue educating employees on mercury mailability guidelines and in developing communication tools to reinforce the dissemination of relevant information to all retail units.

**Target Implementation Date:**

October 2020

**Responsible Official:**

Corporate Communications, Delivery and Retail Operations

**Recommendation 2:**

We recommend the vice presidents, Corporate Communications, and Delivery and Retail Operations develop a reference tool or mechanism summarizing the mercury mailability standards that Retail window employees can quickly and efficiently access when approached by a customer attempting to mail mercury.

**Management Response/Action Plan: Agree**

Employees currently have a variety of existing tools that serve to summarize mercury mailability standards, including the RSS application, stand-up talks, job aids and standard work instructions. In addition, USPS has increased the opportunity to reinforce the employee knowledge base through the Retail Customer Experience (RCE) evaluation program by presenting mercury specific scenarios during shops.

**Target Implementation Date:**

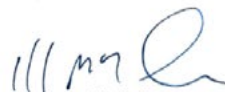
October 2020

**Responsible Official:**

Corporate Communications, Delivery and Retail Operations

*Janice Walker*

Janice D. Walker  
Vice President  
Corporate Communications



Kevin L. McAdams  
Vice President  
Delivery and Retail Operations

cc: CARM

OFFICE OF  
**INSPECTOR  
GENERAL**  
UNITED STATES POSTAL SERVICE

Contact us via our [Hotline](#) and [FOIA](#) forms.  
Follow us on social networks.  
Stay informed.

1735 North Lynn Street  
Arlington, VA 22209-2020  
(703) 248-2100

For media inquiries, contact Agapi Doulaveris  
Telephone: 703-248-2286  
[adoulaveris@uspsig.gov](mailto:adoulaveris@uspsig.gov)