



Office of Inspector General | United States Postal Service

Audit Report

Employee Safety – Postal Service COVID-19 Response

Report Number 20-259-R21 | November 20, 2020



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Highlights

Objective

Our objective was to assess the U.S. Postal Service's response to the novel coronavirus disease (COVID-19) outbreak regarding the safety of its employees.

In March 2020, the president of the United States declared the COVID-19 pandemic a national emergency; its impact to the nation's health and safety has been unprecedented. According to the Centers for Disease Control and Prevention (CDC), as of July 31, 2020, there were 4.5 million cases and 151,000 deaths in the U.S. Many states and communities shut down businesses, asked people to stay home, and prohibited gatherings to slow the spread of the virus. Even during the shutdowns, the Postal Service continued to deliver mail and packages to every address in the nation, every day.

“To lead its pandemic response, the Postal Service created the COVID-19 Command Response Team at headquarters to ensure the agency followed directives and guidance from the CDC.”

To lead its pandemic response, the Postal Service created the COVID-19 Command Response Team at headquarters to ensure the agency followed directives and guidance from the CDC. The Postal Service implemented changes to slow the spread of the virus, manage and support affected employees, and ensure that recovered employees returned to work safely.

To slow the virus's spread, the Postal Service required all employees to wear face coverings where a state or local mandate was in place and social distancing could not be achieved, requested customers to wear face coverings in all retail facilities, and established daily cleaning of the workroom floor and cleaning of frequently touched surfaces between tours. In addition, the Postal Service established a COVID-19 Supplies Command Center to monitor daily inventories in the field and identify facilities in need of essential supplies. This helped ensure millions of face coverings, gloves, and cleaning products were available to about

641,000 Postal Service employees working across 31,500 facilities. To identify employees with COVID-19 symptoms at work, the Postal Service also deployed a temperature-taking proof of concept test at four facilities in May 2020.

For employees who either contracted or were affected by the virus, the Postal Service allowed the use of liberal leave. It also established a Close Contact Tracing Program in April 2020 to outline safety protocols for identifying and quarantining employees who came into close contact with an infected person at work, as well as tracking employees with a positive COVID-19 test. The Postal Service's nursing staff is responsible for conducting contact tracing to determine if any employees were in contact with an infected coworker. They also set return-to-work dates for employees after an exposure to or illness from COVID-19.

The Postal Service's quick actions likely saved lives and certainly increased employee safety. Despite these efforts to contain COVID-19, 33,945 employees took leave to quarantine, 7,421 tested positive for the virus, and 80 died, as of July 31, 2020. The number of new, positive cases in the Postal Service steadily increased since the first confirmed case in February 2020 through the end of July 2020. Therefore, vigilance and additional precautions could help further protect employees.

Findings

While we recognize the challenges facing the Postal Service during the pandemic, we identified three areas where the Postal Service can better protect its employees: (1) face covering policy, (2) contact tracing program, and (3) employee health screening.

First, Postal Service employees did not always wear face coverings when proper social distancing could not be achieved. We visited 10 facilities, including five mail processing and five retail and delivery facilities, and observed employees at four retail and delivery facilities (40 percent) who did not adhere to the local face covering policy. In addition, during our review of camera footage, we observed 41 of 117 facilities (35 percent) with at least one employee not wearing a face covering where a local mandate required one, and while not social distancing.

These employees were behind the counter or in the back of a retail and delivery facility or on the workroom floor in a processing facility.

The Postal Service face covering policy at all facilities cited local or state mandates and when employees could not maintain social distancing in the workplace. However, facility management voiced confusion with the policy and interpreted it to mean that state and local directives determined whether employees were required to wear face coverings. Postal Service Headquarters considered the local requirements supplemental to the nationwide policy.

In addition, managers of offending employees were not always aware they could enforce the face covering policy. An enforcement process which includes engaging the union representative and taking appropriate action existed; however, it was not well-known or followed because it was only communicated verbally to some managers. The confusing face covering policy and its inconsistent enforcement put employees at a higher risk of exposure to COVID-19 and potentially decreased employee availability.

Second, the Close Contact Tracing Program did not include an overarching program goal with associated metrics and did not ensure adequate staffing. Management indicated they did not establish goals for the contact tracing program because they did not believe contact tracing was measurable and did believe that its application varied case by case. However, program goals and performance metrics are essential to monitor progress and determine resources needed. In addition, the responsibilities of and reliance on the nursing staff grew during the pandemic because local public health departments were unable to complete contact tracing. As of July 31, 2020, there were 116 Postal Service nurses nationwide, with 30 vacancies — a 21 percent vacancy rate. Local management did not actively post open positions on the Postal Service's career website. Retaining a full complement of nurses, or supplementing them where necessary with contractor support, is especially important during the COVID-19 crisis.

Lastly, although the CDC recommended temperature taking for employees in April 2020, the Postal Service did not deploy temperature taking within its facilities nationwide. As of July 31, 2020, there was at least one employee who either tested positive for COVID-19 or quarantined due to possible exposure to

the virus at over 7,000 Postal Service facilities. The Postal Service conducted a temperature taking proof of concept test in May 2020 at four facilities, and it plans to conduct health screening tests at two additional facilities.

The Postal Service indicated that it has not deployed nationwide temperature taking tests because completing the test is resource intensive and there were privacy concerns. The Postal Service's process for conducting the tests was complicated, and it required the purchase of different types of thermometers, additional employee time, and coordination with the law department and unions. Additionally, the Postal Service determined that temperature taking alone would not be enough to identify employees with COVID-19. Without conducting daily in-person or virtual health checks of employees before they enter the facility, employees could come to work while sick, increasing the likelihood of transmission of COVID-19 to other employees and customers.

We did not evaluate recent operational changes made by the Postal Service or the significant increases in delayed mail at delivery units experienced this summer. In response to a congressional request received on August 7, 2020, we have an ongoing project which will evaluate these operational changes and their impact on mail service.

Recommendations

We recommended management:

- Clarify and communicate the Postal Service's face covering policy for consistent, nationwide application.
- Communicate policy regarding immediate enforcement and corrective action for non-compliance with the face covering policy.
- Re-evaluate the Close Contact Tracing Program to include program goals, performance metrics, and a hiring initiative to ensure adequate staffing.
- Evaluate options and implement a nationwide health screening initiative which may include employee self-certification.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

November 20, 2020

MEMORANDUM FOR: SIMON M. STOREY
VICE PRESIDENT, EMPLOYEE RESOURCE
MANAGEMENT

A handwritten signature in black ink, which appears to read "Jason M. Yovich", is positioned below the "MEMORANDUM FOR" section.

FROM: Jason M. Yovich
Deputy Assistant Inspector General for Supply Management
and Human Resources

SUBJECT: Audit Report – Employee Safety – Postal Service COVID-19
Response (Report Number 20-259-R21)

This report presents the results of our audit of Employee Safety – Postal Service COVID-19 Response.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact John Cihota, Director, Human Resources and Support, 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 Employee Safety – Postal Service COVID-19 Response (Project Number 20-259). Our objective was to assess the U.S. Postal Service’s response to the novel coronavirus disease (COVID-19) outbreak regarding the safety of its employees. We did not evaluate recent operational changes made by the Postal Service or the significant increases in delayed mail at delivery units experienced this summer. In response

“The Postal Service’s goal is to follow those directives and guidance to “stop, slow, and/or limit the spread of a pandemic, and mitigate illness while lessening the effects on both the economy and society.””

to a congressional request received on August 7, 2020, we have an ongoing project which will evaluate these operational changes and their impact on mail service.

In March 2020, the president of the United States declared the COVID-19 pandemic a national emergency; its impact to the nation’s health and safety has been

unprecedented. According to the Centers for Disease Control and Prevention (CDC), as of July 31, 2020, there were 4.5 million cases and 151,000 deaths in the U.S. Many states and communities shut down businesses, asked people to stay home, and prohibited gatherings to slow the spread of the virus. Even during the shutdowns, the Postal Service continued to deliver mail and packages to every address in the nation, every day.

A recent survey¹ of America’s 100 leading essential companies’ response to the COVID-19 pandemic ranked the Postal Service as number one, based on its resolve, integrity, responsiveness, and performance during COVID-19. With that said, during our review, we identified areas where the Postal Service could better protect its employees. See [Appendix A](#) for additional information regarding the audit.

Background

The Postal Service follows pandemic directives and guidance issued by the president of the United States, the CDC, and state and local authorities. The Postal Service’s goal is to follow those directives and guidance to “stop, slow, and/or limit the spread of a pandemic, and mitigate illness while lessening the effects on both the economy and society.”² To lead its pandemic response, the Postal Service created the COVID-19 Command Response Team at Postal Service Headquarters (HQ). This senior, cross-functional team ensures the agency followed directives and guidance from the CDC. The Postal Service provided personal protective equipment (PPE),³ changed daily procedures, and updated the layout and operations of facilities to prevent employees from getting or spreading COVID-19.

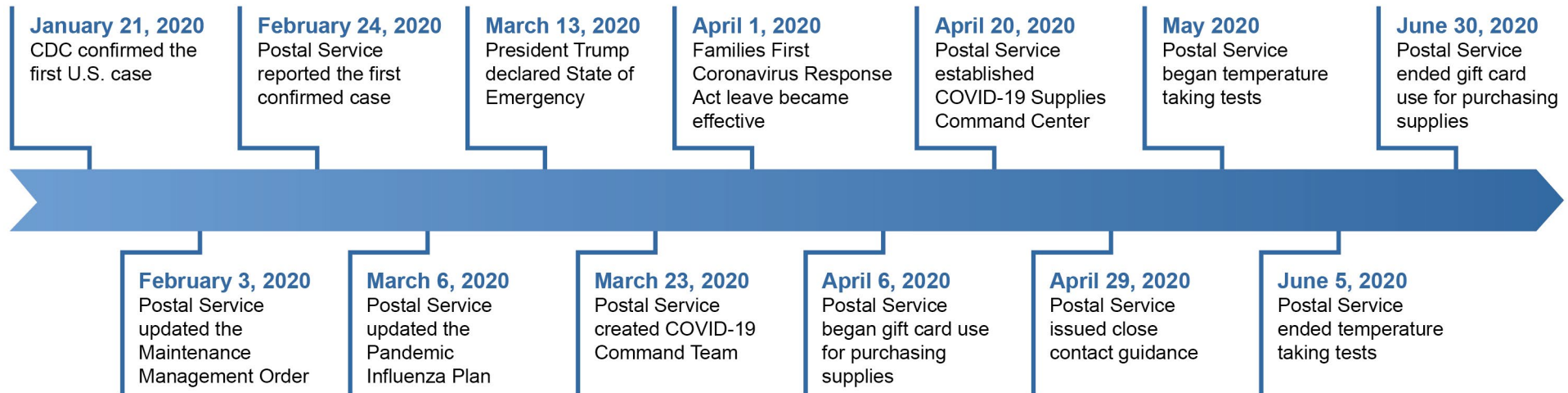
Since reporting its first COVID-19 confirmed case in February 2020, the Postal Service’s quick, decisive actions likely saved lives and certainly increased employee safety. [Figure 1](#) shows a high-level overview of key Postal Service events related to COVID-19 that have occurred since the start of the pandemic.

¹ The Harris Poll, June 12, 2020. The survey was conducted from May 20-22, 2020.

² Postal Service Pandemic Influenza Plan, March 6, 2020

³ Equipment used to protect users from hazards to the eyes, face, head, and extremities.

Figure 1. Timeline of Events Following COVID-19



Source: U.S. Postal Service Office of Inspector General (OIG) analysis of Postal Service events.

The Postal Service implemented changes to slow the spread of the virus, manage and support employees affected by the virus, and ensure recovered employees returned to work safely.

Preventing COVID-19's Spread

To slow the virus's spread, the Postal Service required all employees to wear face coverings when a state or local face covering order or directive is in place or when an employee, including those who do not deal directly with the public, cannot achieve or maintain social distancing in the workplace.⁴ It also requested customers use face coverings while in all retail facilities where mandated locally.⁵

To ensure facilities were safe for employees and customers, the Postal Service issued a Maintenance Management Order (MMO) requiring daily cleaning of the workroom floor and frequently touched surfaces between tours, in accordance with CDC guidance. To do this, the Postal Service used temporary contract cleaners when a facility's custodial staff was unable to provide the necessary cleaning. Additionally, facilities were required to self-certify daily that they complied with these requirements in the Postmaster Portal⁶ or Electronic Maintenance Activity Reporting & Scheduling (eMARS).⁷

In April 2020 – to address the nationwide PPE shortage – the Postal Service allowed individual facilities to supply carriers or facility personnel with fixed gift

⁴ Postal Service LINK, as of July 16, 2020, <https://link.usps.com/2020/07/16/face-coverings-policy/>.

⁵ Postal Service Media statement-COVID-19, dated April 30, 2020, <https://about.usps.com/newsroom/statements/usps-statement-on-coronavirus.htm>.

⁶ A tool to assist in local tracking and management of Line H custodial hours, as required by Handbook MS-47, *Housekeeping Postal Facilities*, custodial work requirements. It is used for certifying the cleaning of retail and delivery facilities.

⁷ eMARS provides inventory management for parts and labor for all processing facilities as well as reporting and alert capability related to inventory management. It is used for certifying the cleaning of processing facilities.

cards⁸ to purchase essential COVID-19 related supplies (i.e. face coverings, cleaning supplies, hand sanitizer, etc.). Local management was also authorized to purchase supplies via Postal Service credit cards. Shortly after, the Postal Service established a COVID-19 Supplies Command Center to monitor daily inventory in the field and identify facilities in need of essential supplies. This helped ensure millions of face coverings, gloves, and cleaning products were available to about 641,000 Postal Service employees working across 31,500 facilities.

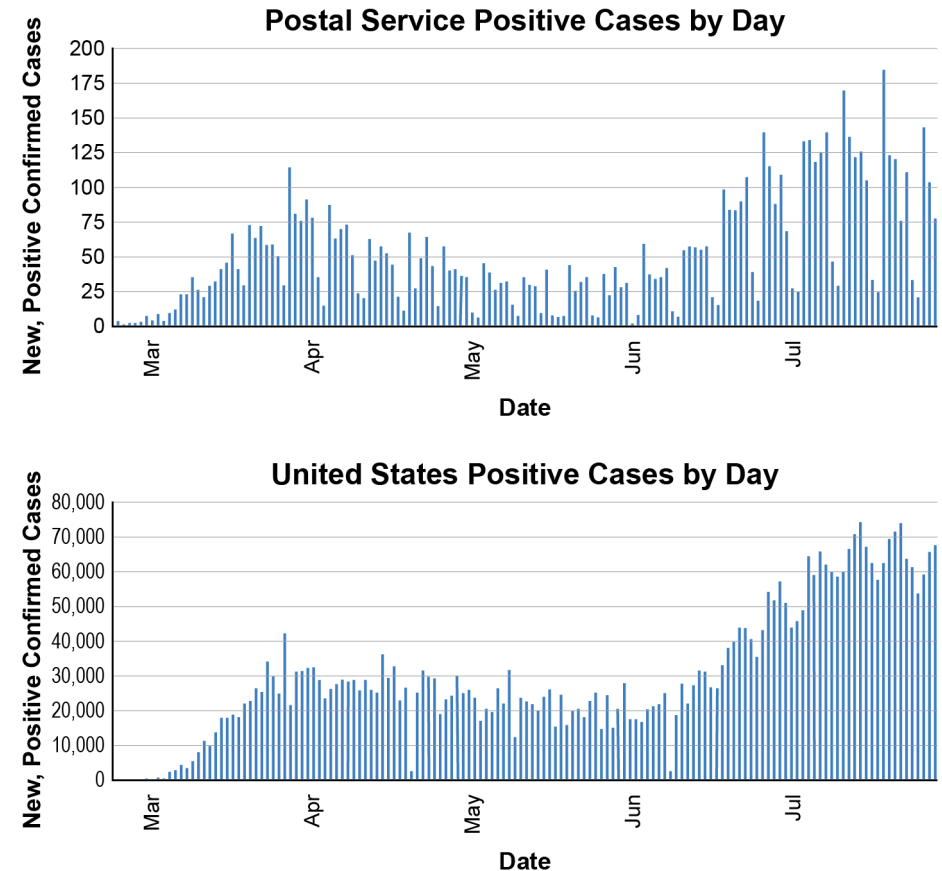
“As of July 31, 2020, the Postal Service reported 7,421 COVID-19 positive-confirmed cases. The number of positive cases spiked in mid-July.”

Additionally, to identify employees with COVID-19 symptoms at work, the Postal Service deployed a temperature-taking proof of concept test⁹ at four facilities for about two weeks in May 2020.

Employees Affected by COVID-19

Despite efforts to suppress COVID-19 within the Postal Service, the number of new, positive cases steadily increased since the first confirmed case in February 2020 through the end of July 2020. As of July 31, 2020, the Postal Service reported 7,421 COVID-19 positive-confirmed cases. The number of positive cases spiked in mid-July. Likewise, the U.S. reported a similar trend over the same period. Figure 2 shows the number of daily new positive cases reported in the Postal Service and the U.S.

Figure 2. Postal Service vs. U.S. Positive COVID-19 Cases



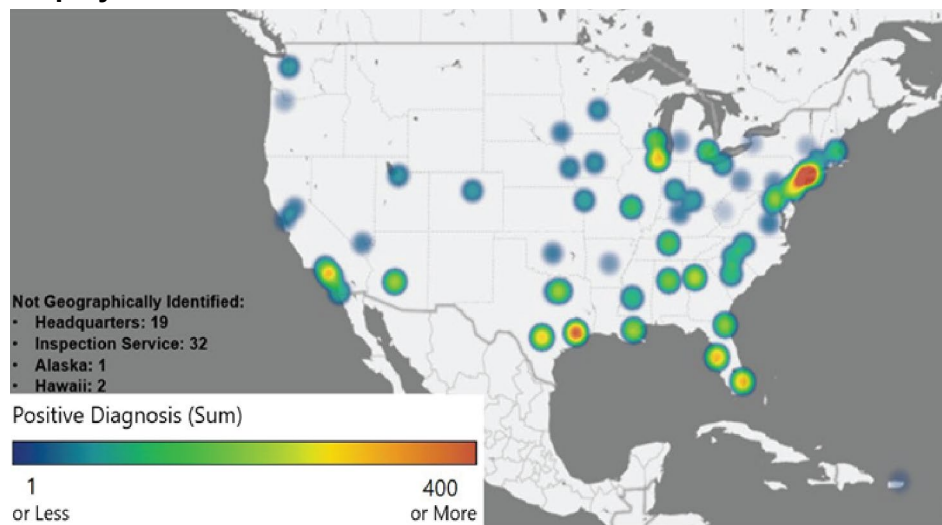
Source: OIG analysis of Postal Service and CDC data.

⁸ Postal Service issued VISA/MasterCard fixed gift cards valued at \$25. The Postal Service ended the use of fixed gift cards for purchasing essential supplies on June 30, 2020.

⁹ The tests occurred in Merrifield, VA from May 18 to June 5, 2020; Falls Church, VA and Fairfax, VA from May 18-29, 2020; and Oklahoma City, OK from May 26 to June 5, 2020.

While the number of COVID-19 employee cases in the Postal Service affected each of the 67 districts, the Seattle District was the first district affected with COVID-19, with 71 of the 7,421 cases (or 1 percent) as of July 31, 2020. At that time, the Houston District has been most affected, with 413 cases (6 percent). Alternatively, the Alaska District has been least affected, with only one case. Figure 3 is a heatmap showing the number of positive COVID-19 employee cases in the Postal Service nationwide.

Figure 3. Heatmap of Positive Diagnosis of Postal Service Employees



Source: OIG analysis of Postal Service data.

As of July 31, 2020, the Postal Service reported 7,421 positive COVID-19 cases, 4,857 of which (65 percent) were employees who worked in retail and delivery facilities. In addition:

- 1,890 (26 percent) were employees who worked at processing facilities;
- 517 (7 percent) were support staff who worked at HQ, area, district, or field offices; and

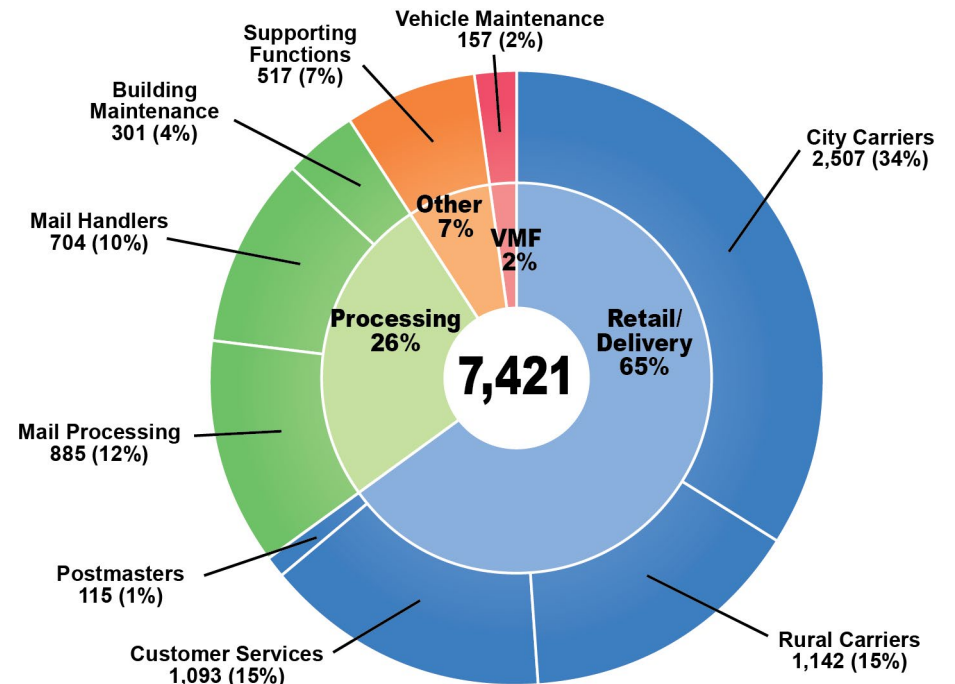
¹⁰ April 29, 2020.

¹¹ For the purposes of this report, we will refer to both occupational health nurse administrator and occupational health nurse positions as nurses.

- 157 (2 percent) were vehicle maintenance employees who worked at vehicle maintenance facilities (VMF).

See Figure 4 for the number of infected employees by craft and facility type.

Figure 4. Number of Infected Employees by Craft and Facility Type



Source: OIG analysis of Postal Service data.

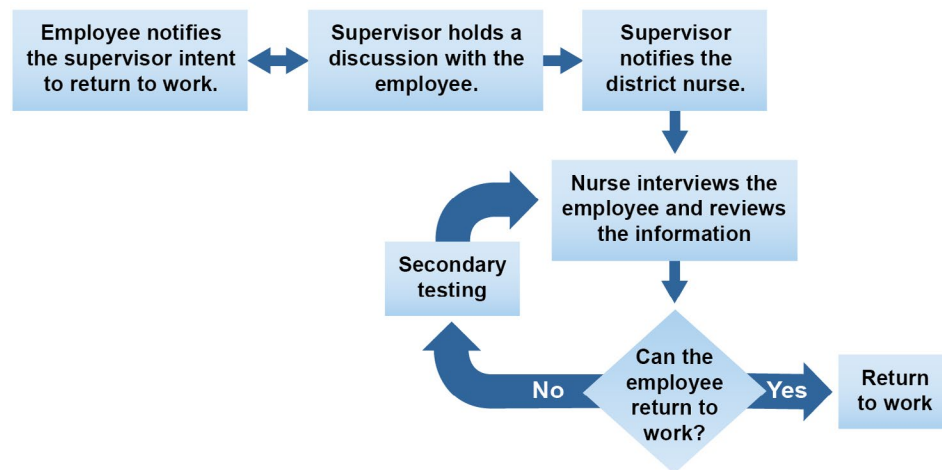
As cases increased, the Postal Service issued COVID-19 close contact guidance¹⁰ and a checklist, which provided a plan for contact tracing among employees when an employee tests positive for COVID-19. According to HQ, the Postal Service established the contract tracing procedures because of a strain on local public health departments. Occupational health nurse administrators or occupational health nurses¹¹ were responsible for conducting contact tracing to determine if any employees were in contact with a sick coworker and make recommendations on whether the employee should self-quarantine or return to

work. During the outbreak, the Postal Service updated leave policies to allow the use of liberal leave, which enabled employees to stay home if they were sick, needed to provide dependent care, or had any other qualifying factor under the Families First Coronavirus Response Act.¹²

Returning to Work

When an employee is ready to return to work after having a confirmed case of COVID-19, Postal Service policy requires the employee have a telephone interview with a Postal Service physician or nurse. After the interview, the Postal Service physician or nurse reviews the information to make a final determination, via a written clearance, on the return-to-work request. Employees are not permitted to return to work without this written clearance. Figure 5 illustrates an employee's return to work process after recovering from a positive case.

Figure 5. Return to Work Process



Source: OIG analysis of Postal Service return to work process.

¹² Effective April 1, 2020.

¹³ These employees have either not received a positive test result or their test results are unconfirmed. This may also include employees that did not take a test.

¹⁴ The Postal Service offered multiple types of face coverings as the pandemic progressed, including cloth face coverings, moisture wicking reusable face coverings, surgical face coverings, and hot weather face cloth coverings.

¹⁵ The Postal Service does not require employees to wear gloves; however, the CDC recommends wearing gloves when cleaning or caring for someone who is sick.

Despite the efforts to contain COVID-19, 33,945 employees took leave to quarantine,¹³ 7,421 tested positive and 80 died, as of July 31, 2020. Therefore, vigilance and additional precautions could help further protect employees.

Finding #1: Employees Not Wearing Face Coverings

While the Postal Service provided its employees with PPE, we found employees did not always wear face coverings when proper social distancing could not be achieved. This was demonstrated through our observations at 10 facilities, review of camera footage, survey of randomly selected facility managers, and analysis of OIG Hotline complaints. Postal Service management did not always know the face covering policy or their enforcement options.

The Postal Service provided PPE to its employees, including gloves and face coverings.¹⁴ Although employees complained of insufficient PPE and supplies when the pandemic first began, the Postal Service quickly responded to ensure its facilities had sufficient supplies to keep employees safe. To accomplish this, the Postal Service established the COVID-19 Supplies Command Center in Topeka, KS to monitor daily inventories in the field and assist districts with identifying facilities in need of essential supplies. As of August 2020, the Postal Service had about 1.6 million pairs of gloves,¹⁵ 1.2 million bottles of hand sanitizer, and 17 million face coverings on hand at the Supplies Command Center for its employees. District supply coordinators communicated with the

“While the Postal Service provided its employees with PPE, we found employees did not always wear face coverings when proper social distancing could not be achieved.”

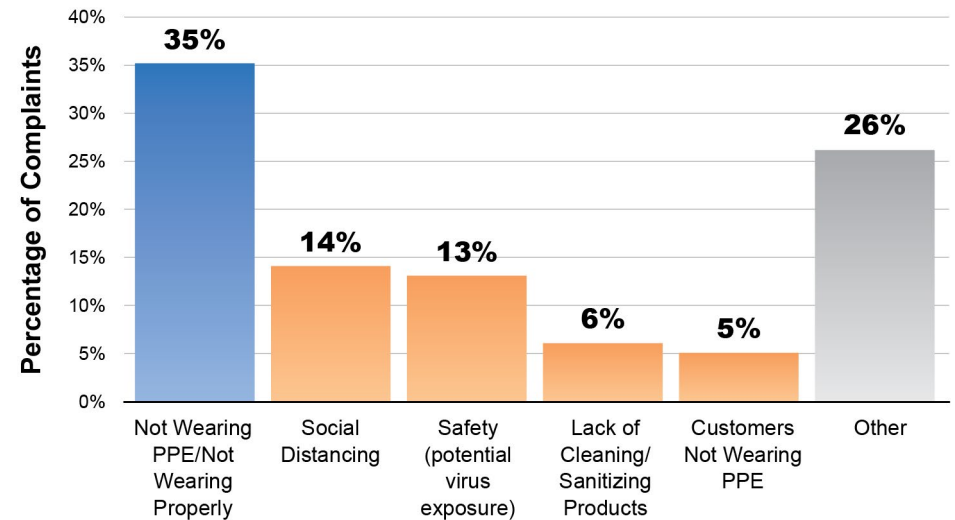
Supplies Command Center and individual facilities to ensure facilities remained well stocked.

While the Postal Service provided its employees with PPE, we found employees did not always wear face coverings when proper social distancing could not be achieved. Specifically:

- We conducted observations at 10 facilities, including five mail processing and five retail and delivery facilities, and observed that employees at four retail and delivery facilities (40 percent) did not adhere to the face covering policy where required by local mandate. All five mail processing facilities we visited followed Postal Service guidance.
- Our review of camera footage observed 41 of 117 facilities (35 percent) with at least one employee who did not wear a face covering where a local mandate required a face covering, and while not social distancing. These employees were behind the counter or in the back of a retail and delivery facility or on the workroom floor in a processing facility.
- We surveyed 500 randomly selected postmasters, plant managers, and first-line managers to obtain information about employee safety at their facilities and received responses from 235 of them (47 percent). Based on survey results, 23 of 235 respondents (10 percent) stated that not all employees wore face coverings at their facilities. See [Appendix B](#) for the survey results.

Additionally, based on our review of 338 OIG Hotline complaints from January through July 2020, we identified 327 safety-related COVID-19 issues.¹⁶ Hotline complaints come to the OIG from concerned customers, Postal Service employees, and the general public when there is suspected fraud, waste, or abuse in the Postal Service, including violations of policy and danger to public health and safety. A plurality of 115 issues (35 percent) were related to employees not wearing or not properly wearing face coverings. Figure 6 shows the top five Hotline complaints about COVID-19 safety.

Figure 6. Top Five Hotline Complaints About COVID-19 Safety



Source: OIG analysis of Hotline complaints.

To reduce the spread of COVID-19, the CDC recommends that people “wear masks in public settings when around people outside of their household, especially when other social distancing measures are difficult to maintain.” The Postal Service policy required “all employees to wear face coverings when there is a state or local face covering order or directive in place, or when an employee, including those who do not deal directly with the public, cannot achieve or maintain social distancing in the workplace.”¹⁷ Headquarters management stated the intent of this policy was that all employees must wear a face covering when social distancing could not be maintained, and that all employees wear a face covering – even when social distancing – if required by state and local ordinances. Local management informed us they interpreted the policy to mean that state and local directives determined whether employees were required to wear face coverings at all.

The Postal Service released multiple reminders about its face covering policy since April 2020 through its website and stand-up talks. All of this communication

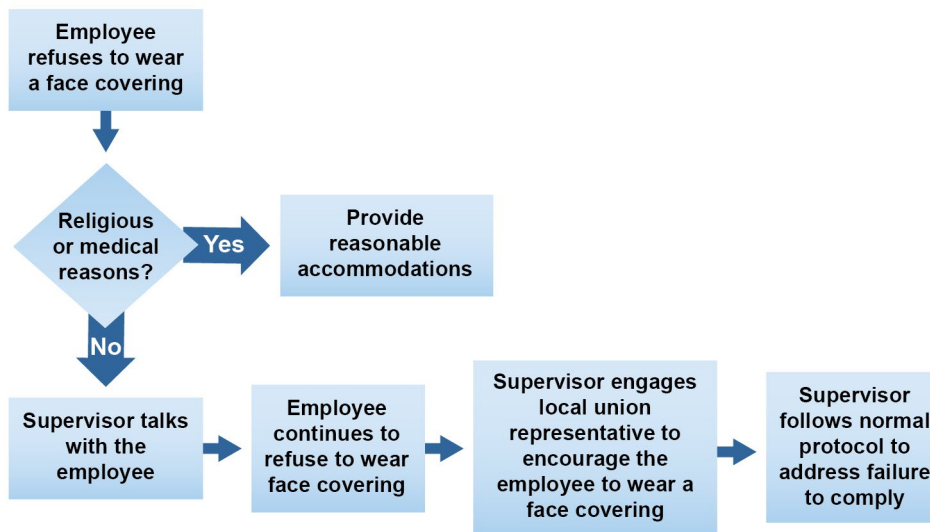
¹⁶ One complaint might cover multiple safety issues.

¹⁷ Postal Service LINK, as of July 16, 2020, <https://link.usps.com/2020/07/16/face-coverings-policy>.

cited local or state mandates and when employees could not achieve or maintain social distancing in the workplace. Postal Service HQ considered the local requirements supplemental to the nationwide policy. Based on our interviews with facility management and union representatives, they did not always understand the face covering policy because the Postal Service is not typically bound by local mandates, and the policy was confusing.

In addition, managers of offending employees were not always aware they could enforce the face covering policy. An enforcement process, which includes engaging the union representative and taking appropriate action existed; however, it was not well-known or followed because it was only communicated verbally to some managers. Figure 7 illustrates the face covering enforcement process.

Figure 7. Face Covering Enforcement Process



Source: OIG analysis of the Postal Service process.

Additionally, this enforcement policy could take multiple days to apply, if the union representative is not on-site. Reminding supervisors that they can take immediate action against non-compliant employees would reduce other employees' risk

of contracting COVID-19. During discussions with HQ, management stated that supervisors could also enforce the policy through regular corrective action procedures detailed in the national union agreements. This was not explicitly communicated to field management. The confusing face covering policy and its inconsistent enforcement potentially put employees at a higher risk of contracting COVID-19 and could also decrease employee availability.

Recommendation #1

We recommend the **Vice President, Employee Resource Management**, clarify and communicate the Postal Service's face covering policy for consistent, nationwide application.

Recommendation #2

We recommend the **Vice President, Employee Resource Management**, communicate policy regarding immediate enforcement and corrective action for non-compliance with the face covering policy.

Finding #2: Close Contact Tracing Program

The Close Contact Tracing Program sets out guidelines for what Postal Service management must do to protect at-risk employees who are in close contact with infected employees. The program did not include an overarching program goal with associated metrics and the staffing levels for carrying out critical parts of the program had high vacancy rates.

The Postal Service established the Close Contact Tracing Program on April 29, 2020, per CDC guidance. It outlined the safety protocols for identifying and quarantining employees who came into close contact with an infected person at work, as well as tracking employees with a positive COVID-19 test. The program documentation requires coordination between the infected employee, nursing staff, supervisors, and district and area Human Resources managers. However, the program lacks a written purpose or overarching goal.

Management indicated that they did not establish goals for the contact tracing program because they did not believe contact tracing was measurable and believed that its application varied from case to case. Without program goals and

performance metrics, it is difficult to identify the resources, monitor progress, and ensure success.

The contact tracing protocol begins when an employee receives a positive test result. The nurse contacts the infected employee's supervisor to collect data related to where the employee had been and with whom they may have been in contact. The nurse then interviews each potentially at-risk employee to assess whether they were in close contact based on CDC definitions.¹⁸ Next, the nurse makes a recommendation whether the at-risk employee should self-quarantine or return to work. Table 1 shows the different levels of work restrictions for asymptomatic employees who interacted with infected employees based on the type of interaction.

Table 1. Work Restrictions Based on the Close Contact Tracing Program

Risk Factors	Exposure Category	Work Restrictions for Asymptomatic Employee
Contact less than 10 minutes	Low	None
Employee wearing face covering	Low	None
Contact asymptomatic at work within 48 hours	Low	None
Contact more than 10 minutes	Medium	Exclude from work for 14 days after last exposure
Age - Over 65	Medium	Exclude from work for 14 days after last exposure
Underlying health conditions	Medium	Exclude from work for 14 days after last exposure

¹⁸ CDC Coronavirus Disease 2019: Contact Tracing for COVID-19, updated September 10, 2020.

¹⁹ They were rehired pursuant to the agency's authority to rehire under the National Defense Authorization Act.

Risk Factors	Exposure Category	Work Restrictions for Asymptomatic Employee
Employee not wearing a face covering	Medium	Exclude from work for 14 days after last exposure
Contact symptomatic at work within 48 hours	Medium	Exclude from work for 14 days after last exposure

Source: Close Contact Tracing Program.

The responsibilities of and reliance on the Postal Service's nurses grew during the pandemic because local public health departments were unable to complete contact tracing. As of July 31, 2020, there were 116 nurses nationwide available to conduct contact tracing to determine if any employees were in contact with an infected employee. These nurses also determined return-to-work dates after an exposure to or illness from COVID-19. Nursing positions at the Postal Service had high vacancy rates. As of July 31, 2020, there were 30 nurse vacancies — a 21 percent vacancy rate. Seven of 30 vacancies (23 percent) were open for over one year. Although the Postal Service rehired 10 nurse annuitants¹⁹ to temporarily supplement its nurses for assistance and contact tracing during the pandemic, these rehired nurses were not permanent and only filled 33 percent of the nurse vacancies. Our interviews with area and district management demonstrated that additional nurses were needed to handle the COVID-19 responsibilities.

Local management did not actively fill nurse positions. There was no national hiring strategy for these critical roles and the vacancies were not posted on the Postal Service's career

“Nursing positions at the Postal Service had high vacancy rates. As of July 31, 2020, there were 30 nurse vacancies — a 21 percent vacancy rate.”

“The CDC recommended temperature taking for employees in April 2020. The Postal Service completed and is currently exploring options for testing on a limited scale.”

website. Management stated there are few eligible candidates because they look for registered nurses who also have federal occupational health experience. The Postal Service could explore options to provide in-depth, onboarding training to help lower the minimum qualifications and expand the number of qualified applicants for positions associated with contact tracing. Retaining a full complement of nurses or supplementing them where necessary with contractor support is especially important during the COVID-19 crisis.

Although the Postal Service established the Close Contact Tracing Program per CDC guidance, it did not include an overarching program goal with associated metrics and did not ensure adequate staffing.

Recommendation #3

We recommend the **Vice President, Employee Resource Management**, re-evaluate the Close Contact Tracing Program to include program goals, performance metrics, and a hiring initiative to ensure adequate staffing.

Finding #3: Temperature Taking Tests

The CDC recommended temperature taking for employees in April 2020. The Postal Service completed and is currently exploring options for testing on a limited scale. However, a health-screening program was not developed nationwide because the implementation was resource intensive – requiring employee and management time, the procurement of thermometers, and proper privacy protections.

Under the National Labor Relations Act,²⁰ the Postal Service is required to negotiate with its labor unions regarding any changes to employee working conditions. Because screening employees would be a change in working conditions, the Postal Service coordinated with the unions to begin a temperature taking “proof of concept”. Under the program, willing employees had their temperatures taken when they reported to work, either once they came inside, before they entered, or in their cars. Employees were sent home if the reading was 100.4 degrees Fahrenheit or higher until the fever receded. This test occurred for about two weeks at the following four facilities in May and June 2020:²¹

- Merrifield Processing and Distribution Center (P&DC), VA
- Falls Church Carrier Annex, VA
- Fairfax Main Post Office, VA
- Oklahoma City P&DC, OK

Findings the Postal Service identified during the tests included:

- Some of the available temperature taking devices were not sufficiently reliable.
- It was difficult to ensure employee privacy concerns were adequately addressed.
- Temperature testing on a national scale would be extremely difficult due to privacy considerations and qualified personnel needed to conduct temperature taking.
- Since daily temperature testing was voluntary, a significant number of employees decided to opt out.

The Postal Service is currently exploring options for more comprehensive employee health screening tests at two additional facilities: the Detroit Metroplex and the Morgan P&DC. These two facilities were selected jointly by the

²⁰ A federal law that grants employees the right to form or join unions; engage in protected, concerted activities to address or improve working conditions; or refrain from engaging in these activities.

²¹ The tests occurred in Merrifield from May 18, 2020 to June 5, 2020; Falls Church and Fairfax from May 18-29, 2020; and in Oklahoma City from May 26, 2020 to June 5, 2020.

Postal Service and national union leadership.²² The Postal Service has completed discussions with its unions on how to conduct the two tests, and they are in agreement. The Postal Service's health screening tests may include mandatory temperature checks, on-site COVID-19 testing provided by a third-party vendor, and employee health self-assessments.

Although the CDC recommended “employers should measure the employee’s temperature and assess symptoms prior to them starting work” in April 2020,²³ the Postal Service did not deploy temperature taking within its facilities nationwide. Management has not deployed a nationwide temperature taking initiative because the CDC stated health screenings may not be “completely effective” at identifying individuals with COVID-19.²⁴ However, as of July 31, 2020, there was at least one employee who either tested positive for COVID-19 or quarantined due to possible exposure at over 7,000 Postal Service facilities. The Postal Service ran temperature taking tests for less than one month at four facilities, and it plans to conduct employee health screening tests at two other facilities. These six facilities accounted for less than 0.1 percent of affected facilities. Any proactive approach to help detect early indication of COVID-19 could protect employees and reduce further infection.

Postal Service management indicated that they have not deployed nationwide temperature taking tests because completing the test is resource intensive and there were privacy concerns. The Postal Service’s process for conducting the tests was complicated, and it required the purchase of different types of thermometers, additional employee time, and coordination with the law department and unions. Additionally, the Postal Service determined that temperature taking alone would not be enough to identify employees with COVID-19 and encouraged employees to stay home if they are sick through numerous mandatory stand-up talks. However, tracking temperatures can provide early warning of infection and each employee should play a role in reducing transmission of COVID-19. To that end, the Postal Service could require employees to take their own temperatures at home, designate one or more

employee to manually conduct the screenings on-site, or employ an automated self-certification method.

“Although the CDC recommended “employers should measure the employee’s temperature and assess symptoms prior to them starting work” in April 2020, the Postal Service did not deploy temperature taking within its facilities nationwide.”

Without conducting daily in-person or virtual health checks of employees before they enter the facility, employees could come to work while sick, increasing the likelihood of transmission of COVID-19 to other employees and customers.

Recommendation #4

We recommend the **Vice President, Employee Resource Management**, in conjunction with the **Vice President, Labor Relations**, evaluate options and implement a nationwide health screening initiative, which may include employee self-certification.

Management’s Comments

Management partially agreed with recommendations 1 and 3; however, they disagreed with recommendations 2 and 4.

Regarding recommendation 1, management indicated the Postal Service followed the COVID-19 strategies and measures the CDC and public health departments recommended. They stated that the current face covering policy is in line with current CDC guidance. The Postal Service plans to continue to deliver COVID-19 policies and guidance to the entire organization by leveraging its communication channels, including an internal webpage, interactive dashboard, mandatory

²² Including the American Postal Worker Union and National Postal Mail Handlers Union.

²³ CDC *Interim Guidance*, dated April 8, 2020.

²⁴ CDC *General Business Frequently Asked Questions*, dated May 6, 2020.

stand-up talks, internal news articles, and daily and weekly briefing sheets. The Postal Service also plans to develop a communications calendar to ensure specific communications, such as face covering guidance, will be distributed on a more frequent, regularly scheduled basis.

Regarding recommendation 3, management stated that establishing metrics and program goals for the Close Contact Tracing Program will enable leadership to monitor performance at the field level and ensure that timely activities are taken. However, management indicated that the recommendation to initiate a hiring plan to ensure adequate staffing for conducting close contact investigations is not needed. They stated that close contact tracing does not require medically trained staff and training can be conducted with existing staffing levels. The Postal Service established two targets for timeliness of case investigation and contact tracing and will communicate them to Human Resources staff nationwide. The target implementation date for recommendations 1 and 3 is December 1, 2020.

Regarding recommendation 2, management stated that in each collective bargaining agreement with respective unions, Article 16 outlines a “bargained for” disciplinary procedure. The procedure provides the basic principle that any disciplinary action should be corrective in nature, rather than punitive. It also requires that no employee be disciplined or discharged except for just cause. Any such discipline or discharge is subject to the grievance-arbitration procedure provided in each of the collective bargaining agreements.

Regarding recommendation 4, management stated that temperature readings, medical testing, and medical questionnaires are considered confidential medical information by the Equal Employment Opportunity Commission (EEOC) and under federal law. Although the EEOC acknowledges that employers are authorized to take daily temperature readings from employees and use employee questionnaires to assess whether an employee is suffering from COVID-19, this information needs to be confidential.

Additionally, management stated that the Rehabilitation Act and the Privacy Act must be considered with employee temperature taking and use of COVID-19 questionnaires.

The Rehabilitation and Privacy Acts require that employees’ medical information be stored separately from their personnel file, thus limiting access to the confidential information. In addition, the EEOC views employee temperature taking and questioning regarding COVID-19 symptoms as a medical procedure to be performed privately and apart from other employees and individuals. An employee should be notified in a private setting if he or she is found to have a fever or COVID-19 related symptoms, or is instructed to go home to self-quarantine. If the Postal Service fails to protect employees’ privacy during the temperature taking or medical questioning process, it could be subject to liability under EEOC regulations and the Rehabilitation and Privacy Acts.

See [Appendix C](#) for management’s comments in their entirety.

Evaluation of Management’s Comments

The OIG considers management’s comments on recommendations 1 and 3 to be responsive. While management partially agreed with recommendations 1 and 3, the planned corrective actions should satisfy the intent of these recommendations. The OIG considers management’s comments unresponsive to recommendations 2 and 4.

Regarding recommendation 2, management described the reasonable accommodations for face covering process during our correspondences with them. As illustrated in [Figure 7](#), managers and supervisors should follow the normal protocol to address with employees any failure to follow instructions and safety issues. This normal protocol is the corrective action procedure detailed in national union agreements. Further, management’s response implies that our recommendation of immediate enforcement and corrective action should be punitive and require employees be disciplined or discharged. We did not state that in the report. Rather, our report focused on protecting employees and awareness of managers as to their rights in this situation. As the number of new positive COVID-19 cases steadily increases in the nation, employees were at a higher risk of contracting COVID-19 when not wearing face coverings. In addition, during fieldwork, several managers were unaware that they were able to enforce the policy. Therefore, we affirm our position that management should communicate policy, to include that incorporated in Article 16, regarding

immediate enforcement and corrective action for non-compliance with the face covering policy.

Regarding recommendation 3, management stated that close contact tracing does not require medically trained staff; therefore, a hiring plan to ensure adequate staffing for conducting close contact investigations is not needed. However, conducting close contact tracing and/or determining whether employees can return to work after a confirmed case of COVID-19 would require frequent access to employees' medical records. These records currently are only accessible by nurses and Human Resources personnel who have required clearances. Although training can be conducted with existing staffing levels to assist in administrative tasks, the Postal Service will need to ensure that those employees who are not nurses or Human Resources personnel have adequate clearances to ensure that each employee and their close contacts can be evaluated in a timely manner.

Regarding recommendation 4, management did not address the recommendation. Rather, they discussed they need to protect data related to health screening options. We agree that employee medical information is confidential; however, in their response, management stated that the EEOC

acknowledged that employers are authorized to take employee temperatures daily and use employee questionnaire responses to assess whether an employee may have COVID-19. We offered possible options in our report, including having employees take their own temperatures at home or deploy an automated self-certification method. With these options, as the Postal Service noted in its response to our recommendation, it would need to take necessary actions to protect the information provided. A nationwide health screening initiative would further protect Postal Service employees in the workplace.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed. We view the disagreements on recommendations 2 and 4 as unresolved and plan to pursue them through the audit resolution process.

Appendices

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Appendix A: Additional Information

Scope and Methodology

The scope of our audit was employee safety regarding COVID-19 from January through July 2020. We reviewed and analyzed COVID-19 related data for employees infected, including location and position, as of July 31, 2020. We judgmentally selected seven processing and seven retail and delivery facilities with high numbers of infected employees. We conducted 10 site visits and four virtual interviews at these judgmentally selected sites located in the areas and districts in Table 2.

Table 2. Fieldwork Sites

Fieldwork	Area ²⁵	District
Site Visit	Atlantic	Westchester
	Atlantic	Philadelphia Metro
	Atlantic	Baltimore
	Western-Pacific	San Francisco
	Western-Pacific	Colorado/Wyoming
Virtual Interview	Southern	Dallas
	Central	Lakeland

Source: OIG analysis.

To accomplish our objective, we:

- Identified Postal Service policies and guidelines related to PPE, facilities, daily procedures, and staffing management.
- Interviewed Postal Service HQ personnel to determine how policies and guidelines were communicated to the field.

- Interviewed area and district Human Resources managers to determine how policies and guidelines were received from HQ and communicated to the field.
- Reviewed and analyzed camera footage for 117 facilities to observe employee/customer face coverings, social distancing, signage, etc.
- Reviewed the judgmentally selected facilities to determine if daily cleanings were certified as required from the Postmaster Portal and eMARS.
- Obtained custodian vacancies to determine the numbers of vacancies nationwide and the impact on facility cleanings.
- Interviewed unions and management associations to obtain their perspective on employee safety.
- Reviewed and analyzed OIG Hotline complaints, Occupational Safety and Health Administration complaints, and Enterprise Customer Care complaints related to COVID-19.
- Created a survey using Survey Gizmo and received responses from 235 out of 500 randomly selected postmasters, plant managers, and first-line managers to obtain additional information. See [Appendix B](#) for the survey results.

We conducted this performance audit from June through November 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 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 September 30, 2020, and included their comments where appropriate.

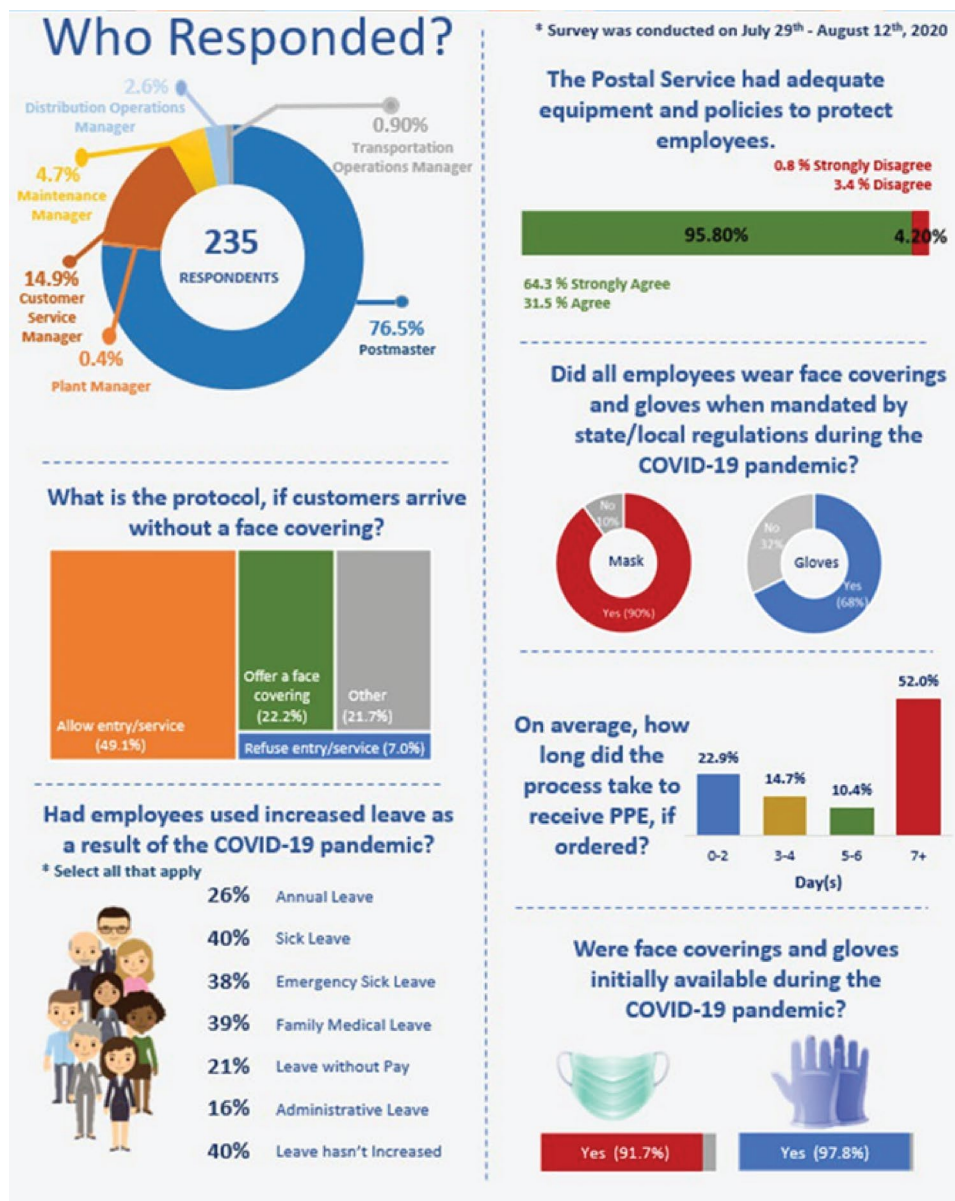
²⁵ Area change effective August 7, 2020.

The number of infected employees was provided by the Postal Service and data provided was based on manual inputs from the districts. There were many challenges and privacy concerns with obtaining the data. Therefore, we did not assess the reliability of any computer-generated data for the purposes of this report and relied on what was provided by the Postal Service.

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: Survey Results



Source: OIG analysis of Survey Gizmo.

Appendix C: Management's Comments

SIMON M. STOREY
VICE PRESIDENT
EMPLOYEE RESOURCE MANAGEMENT



November 6, 2020

LAZERICK POLAND
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Employee Safety- Postal Service COVID-19 Response (Project Number 20-259-DRAFT)

1. We recommend the Vice President, Employee Resource Management, clarify and communicate the Postal Service's face covering policy for consistent, nationwide application.

Management' Response:

Management agrees with this recommendation in part. The Postal Service has continued to follow the COVID-19 strategies and measures recommended by the Centers for Disease Control and Prevention (CDC) and public health departments.

Our current policy on face coverings is in line with current CDC guidance and requires employees to wear face coverings in the following situations;

- All employees are required to wear face coverings when there is a state or local order or directive to do so
- All employees are required to wear face coverings – including those who do not deal directly with the public - an employee who does not deal directly with the public – when they cannot achieve or maintain social distancing in the workplace.

We will continue to deliver COVID-19 policies and guidance to the entire organization by leveraging the following communication channels;

- An internal webpage containing all guidance and policy documents including Face Covering guidance.
- An interactive dashboard that provides Face Covering orders by State and Jurisdiction
- Mandatory Stand-Up talks
- Internal News Articles
- Daily and weekly briefing sheets highlighting specific topics

To assist in the communication, process the Postal Service will develop a Communications Editorial calendar to ensure specific communications, such as Face Covering guidance, will be distributed on a more frequent, regularly scheduled protocol.

Target Implementation date: 12/1/2020

Responsible Official:

Vice President, Employee Resource Management

2. We recommend the Vice President, Employee Resource Management, communicate policy regarding immediate enforcement and corrective action for non-compliance with the face covering policy.

Management' Response:

Management disagrees with the recommendation. In each collective bargaining agreement with our respective Unions, Article 16 outlines a bargained for disciplinary procedure. This procedure provides the basic principle that any disciplinary action should be corrective in nature, rather than punitive and requires that no employee may be disciplined or discharged except for just cause. Moreover, any such discipline or discharge shall be subject to the grievance-arbitration procedure provided for in each of the collective bargaining agreements.

Target Implementation date:

Responsible Official:

Vice President, Employee Resource Management

3. We recommend the Vice President, Employee Resource Management, re-evaluate the Close Contact Tracing Program to include program goals, performance metrics, and a hiring initiative to ensure adequate staffing.

Management' Response:

Management agrees with this recommendation in part. Establishing metrics and program goals for the Close Contact Tracing Program will enable leadership to monitor performance at the field level and ensure that timely activities are being undertaken. The recommendation to initiate a hiring plan to ensure adequate staffing for conducting close contact investigations is not needed. Close Contact Tracing does not require medically trained staff. Training can be conducted with existing staffing levels to ensure that during periods of high activity, each employee and their contacts can be assessed in a timely manner.

Management will establish the following targets for the timeliness of case investigation and contact tracing and will communicate it to Human Resources staff nationwide:

- 90% of positive employee cases will be reached within 1 day of receiving a positive lab result.
- 80% of close contacts will be reached within 3 days of USPS receiving a positive lab result.

Target Implementation Date: December 1, 2020

Responsible Official:

Senior Director, Occupational Safety and Health

4. We recommend the Vice President, Employee Resource Management, in conjunction with the Vice President, Labor Relations, evaluate options and implement a nationwide health screening initiative, which may include employee self-certification.

Management' Response:

Management disagrees with the recommendation.

Temperature readings, medical testing and medical questionnaires are considered confidential medical information by the Equal Employment Opportunity Commission (EEOC) and under federal law. The EEOC has issued guidance for employers to follow when taking employee temperatures and using COVID-19 symptom questionnaires. See <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws>. The EEOC has acknowledged that employers are authorized to take temperature readings from employees on a daily basis and to use employee questionnaires to assess whether an employee is suffering from COVID-19, due to the status of COVID-19 as a pandemic. Id. However, the EEOC cautions that the temperature test readings and questionnaires are considered to be medical information that needs to be kept confidential. Id.

In addition, the Rehabilitation Act and the Privacy Act come into play with employee temperature taking and use of COVID-19 questionnaires. The Rehabilitation Act and the Privacy Act require that all medical information about a particular employee be stored separately from the employee's personnel file, thus limiting access to this confidential information. An employer may store all medical information related to COVID19 in existing medical files. This includes an employee's statement that he or she has COVID-19 or related symptoms or suspects he or she has the disease, or the employer's notes or other documentation from questioning. There is no need for the Postal Service to create a new record file to house COVID-19 medical information, provided that the medical information collected can be placed in an existing Postal Service system of record. In this case the Postal Service would collect identified medical information to determine an employee's fitness for duty, which would be the basis for storing this information in our existing system of medical records.

The second privacy issue relates to the process used to test employees for a fever or COVID 19. As previously noted, the EEOC views employee temperature taking and questioning regarding COVID-19 symptoms to be a medical procedure. As such, these two tasks have to be performed in manner that is isolated and apart from other employees and individuals. If an employee is found to have a high fever and/or other COVID-19 related symptoms, they would need to be advised of these findings in a private setting. If an employee is instructed to go home to self-quarantine, it is important this instruction be given in a private setting and the employee allowed to leave postal premises without other employees knowing the reason for the employee's departure. If the Postal Service fails to protect the employee's privacy interests during

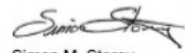
- 4 -

the temperature taking or medical questioning process, it could be subject to liability under EEOC regulations and the Rehabilitation and Privacy Acts.

Target Implementation date:

Responsible Official:

Vice President, Employee Resource Management
Vice President, Labor Relations



Simon M. Storey

cc: Doug Tulino
Linda DeCarlo
Joseph Bruce
[REDACTED]

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

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