Audit Report

Service Performance of Election and Political Mail During the November 2020 General Election

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Highlights

Objective

Our objective was to evaluate the U.S. Postal Service's service performance of Election and Political Mail during the November 2020 general election. We also evaluated the handling of mail for the Georgia Senate runoff election held on January 5, 2021.

Election Mail is any mailpiece that an authorized election official creates for voters participating in the election process and includes ballots and voter registration materials. Political Mail is any mailpiece created by a registered political candidate, a campaign committee, or committee of a political party for political campaign purposes.

Depending on the preference of the customer, Election and Political Mail can be sent as either First-Class Mail, which typically takes 2 to 5 days to be delivered, or Marketing Mail, which typically takes 3 to 10 days to be delivered. However, ballots returned by voters are generally sent as First-Class Mail. While Marketing Mail has longer processing and delivery timeframes, it costs the customer less than First-Class Mail. Historically, as election day draws nearer, the Postal Service has processed Election Mail in line with First-Class Mail delivery standards, even if it was sent as Marketing Mail.

The Postal Service plays a vital role in the American democratic process and this role continues to grow as the volume of Election and Political Mail increases. Due to the COVID-19 pandemic, there was an increase in the number of Americans who voted by mail in the 2020 general election. According to the U.S. Elections Project, there were over 159.6 million ballots counted in the 2020 general election. The Postal Service processed and delivered at least 135 million identifiable ballots going to and coming from voters from September 1 through November 3, 2020. It is important to note that election boards individually determine whether to integrate the use of barcodes in their mailing processes and that the Postal Service can currently only track the performance of processed mailpieces (i.e., sorted, transported, and delivered) if they have barcode mail tracking technology and receive required processing scans. The total number of ballots processed without a barcode is unknown.

We evaluated the Postal Service's performance leading up to and during the November 2020 general election. To do so, in October, we conducted unannounced site visits at 102 processing plants and 1,710 delivery/retail units, covering all 50 states, the District of Columbia, and Puerto Rico. During the week of the general election, we conducted daily, announced site visits at 27 processing plants and 56 delivery/retail units. We also observed international Election Mail operations at the Chicago, New York, Los Angeles, San Francisco, and Miami International Service Centers (ISC) during the 2020 general election and Georgia Senate runoff election. Due to different processing procedures for international ballots, we will issue a separate report on the ISCs.

> *"The Postal Service prioritized processing of Election Mail during the 2020 general election, significantly improving timeliness over the 2018 mid-term election even with significantly increased volumes of Election Mail in the mailstream."*

Finding

The Postal Service prioritized processing of Election Mail during the 2020 general election, significantly improving timeliness over the 2018 mid-term election even with significantly increased volumes of Election Mail in the mailstream. Although timeliness was slightly below goals, proper handling and timely delivery of all Election Mail, especially ballots, was the number one priority of the Postal Service. The Postal Service also leveraged high-cost efforts such as extra transportation and overtime to improve delivery performance. Further, while our site visits did identify some delayed Election Mail and compliance issues, the Postal Service took immediate corrective actions to address the identified issues. However, we did find opportunities for the Postal Service to increase the volume of ballots included in service performance and improve its internal communication on Election Mail guidance and processes.

Additional Resources and Extraordinary Measures Implemented by the Postal Service

On August 18, 2020, the Postmaster General (PMG) reiterated the Postal Service's critical role and commitment to delivering Election Mail, and stated that on October 1, 2020, the Postal Service would engage standby resources in all areas of operations, including transportation, to satisfy any unforeseen demand related to Election Mail. Additionally, the PMG expanded the Election Mail Task Force to include leaders of the postal unions and management associations to ensure that election officials and voters are well informed and fully supported by the Postal Service.

Further, on August 21, 2020, the Postal Service Board of Governors established a bipartisan Election Mail Committee to oversee the Postal Service's support of the mail-in voting process.

On September 21, 2020, a federal court required the Postal Service to implement several actions on September 25, 2020. This included treating all Election Mail as First-Class Mail as capacity allows, even if sent as Marketing Mail; pre-approving all overtime from October 26 through November 6, 2020; and encouraging extra transportation for prompt delivery of Election Mail. Even though these requirements were set forth in the court order, the Postal Service has historically processed Election Mail in line with First-Class Mail delivery standards as election day draws nearer and implemented extraordinary measures such as overtime and extra transportation as necessary.

On September 25, 2020, the Postal Service issued a directive authorizing and instructing the use of additional resources across

"The Postal Service encouraged election officials to take advantage of its barcode tracking capabilities to increase the electronic visibility of ballots in the mailstream and to assist in the processing and delivery of ballots."

operations, such as extra transportation and overtime, to ensure the timely processing, transportation, and delivery of Election Mail.

Lastly, on October 26, 2020, the Postal Service implemented extraordinary measures to accelerate the delivery of ballots to ensure they were included in the election process. This included expedited delivery of ballots through Express Mail and postmarking and sorting ballots for local delivery at delivery units, rather than sending them to mail processing facilities.

We found overall extra transportation trips increased by 35.1 percent and overtime associated with mail processing, delivery, and customer service increased by 29.8 percent from September to October 2020.

Ballots Not Measured in Service Performance

The Postal Service encouraged election officials to take advantage of its barcode tracking capabilities to increase the electronic visibility of ballots in the mailstream and to assist in the processing and delivery of ballots. However, the Postal Service was only able to measure service performance for 71.5 million (or 52.9 percent) of the 135 million identifiable ballots in Postal Service data. This occurred, in part, because the Postal Service can measure service performance on ballots going to voters only if they are sent full-service (i.e., ballots have a unique barcode) and receive necessary processing scans to provide end-to-end visibility into the mailstream.

Specifically, about 43.5 million ballots were sent to voters without unique barcodes and thus were excluded from measurement. An additional 20.3 million ballots sent as full-service to voters, were excluded because they did not comply with business rules or were missing key scan data to be included in service performance measurement.

Mailpieces can be excluded from service performance measurement because of mailer or Postal Service issues. While the Postal Service tracks reasons why full-service mailpieces are excluded from service performance measurement, they do not track them specifically for ballots. Therefore, they could not provide reasons why these full-service ballots were excluded from service performance measurement.

Service Performance of Election and Political Mail, and Ballots Delivered After Election

From September 1 through November 3, 2020, the Postal Service processed almost 134 million Election Mail pieces included in service performance measurement (mailpieces with barcode mail tracking technology that received required processing scans for measuring performance) and over 1.6 billion Political Mail pieces included in service performance measurement. Election Mail was processed in time to meet its service standard 93.8 percent of the time, an increase of about 11 percentage points for Election Mail processed from the same time period in 2018. The on-time goal for Election Mail, generally sent as First-Class Mail, is 96 percent. While Election Mail processed on time did not meet this goal, it exceeded all other First-Class Mail processed on time by 5.6 percentage points, showing prioritization of this mail. Further, the Postal Service has not met its First-Class Mail service goal in five years.

Conversely, identifiable and measurable Political Mail (e.g., advertisements for political candidates) was processed in time to meet its service standard 91.9 percent of the time, a decrease of about 3 percentage points from the same time period in 2018. Political Mail is generally sent as Marketing Mail, which has an on-time goal of 91.8 percent.

According to the Postal Service, 28,172 ballots were sent to voters from election offices within 4 days of the election. Sending out ballots this late does not typically provide the Postal Service the required time to process, transport, and deliver the ballots within the First-Class Mail service standard of 2 to 5 days. However, due to extraordinary measures implemented by the Postal Service, over 94 percent of those ballots were delivered to voters on or before election day. Only 1,567 ballots were delivered to voters after the election, 1,548 of which were still delivered within service standards. During the week of the general election, 98.1 percent of identifiable ballots were processed in time to meet its service standard.

Site Observations

During the month of October 2020, we conducted observations at processing facilities and delivery units across the country to determine if the Postal Service was processing and delivering Election Mail timely and complying with election procedures. While the majority of Election Mail observed was processed and delivered timely, we did identify issues with mail processing facilities and delivery/retail units complying with election procedures such as not conducting daily all-clear checks of Election Mail or postmarking all ballots as required. Some facilities had more than one compliance issue.

We identified compliance issues during 30 (or 29 percent) of the 102 mail processing facility observations, including:

- Election Mail pieces committed for delivery that day but remaining at the facility. This occurred during 21 observations and totaled 17,285 delayed mailpieces. Once identified, the Postal Service expedited the processing of the delayed mailpieces, and all were likely delivered by election day.

- Facilities not completing daily all-clear checks of Election Mail during seven observations.

- Facilities not ensuring all ballots were postmarked during two observations.

- Facilities not having an Election/Political Mail staging area during three observations.

We identified compliance issues during 234 (or about 14 percent) of the 1,710 delivery/retail unit observations, including:

- Election Mail pieces committed for delivery that day but remaining at the unit. This occurred during 58 observations and totaled 25,911 delayed mailpieces. Once identified, the Postal Service expedited the delivery of the delayed mailpieces, and all were likely delivered by election day.

- Units not completing daily all-clear checks of Election Mail during 103 observations. The units were required to complete a daytime and evening all-clear certification, but the Postal Service system only showed the time of the last certification entered for the day. While it is possible all-clear checks could have been completed at these units after our visit, there was no Postal Service record to verify the all-clear checks occurred.

- Unit management not knowing or understanding Postal Service policy by saying they would not postmark a ballot, if a customer specifically requested it when mailing their ballot, during 67 observations.

- Units not completing an Election/Political Mail log during 28 observations.

During the week of the election (November 2 through November 4, 2020), we conducted 81 mail processing observations at 27 facilities and 169 delivery/retail unit observations at 56 units, for a total of 250 observations. While compliance issues still existed, we only identified 760 delayed Election Mail mailpieces, all of which were delivered to election offices on or before election day.

We provided daily and weekly updates to the Postal Service management, Board of Governors, and Congress on the results of our observations, and the Postal Service took immediate corrective action to address the issues identified.

"*During the week of the election (November 2 through November 4, 2020), we conducted 81 mail processing observations at 27 facilities and 169 delivery/retail unit observations at 56 units, for a total of 250 observations. While compliance issues still existed, we only identified 760 delayed Election Mail mailpieces, all of which were delivered to election offices on or before election day.*"

While Postal Service management responded to challenges quickly, we did note that communication of Election Mail guidance and process changes did not always reach local facility management quickly and effectively. For example, local facility and unit management was not always aware of what time daily all-clears had to be completed. Specifically, before the election, the Postal Service changed

delivery/retail unit daily all-clear procedures to a two-phase certification. The first phase of certification was required by 2 p.m., which is after carriers left for delivery, while the second phase was required after carriers returned for the day. Some delivery unit managers were certifying the all-clear of Election Mail prior to carriers leaving for the day. We reviewed nationwide data on daily all-clear certifications and found 120,317 delivery/retail unit all-clear certifications (or 15 percent of all certifications) were submitted before 8 a.m., indicating they were not completed according to policy. Further, some delivery/retail unit managers were not aware that the certification had to be completed in two phases.

By not always following Election Mail processes and without quick and effective communication, the Postal Service risked delaying Election Mail.

We conducted additional observations of mail processing facilities and delivery/retail units during the Georgia Senate runoff election. Overall, we continued to see similar compliance issues (e.g., lack of understanding of requirements for all-clears and postmarking ballots) and causes for delayed Election Mail that we previously identified during the general election. See Appendix B for the results of our Georgia Senate runoff election observations.

Actions Implemented from Prior Audit Recommendations

In our recent P*rocessing Readiness of Election and Political Mail During the 2020 General Elections* audit (Report Number 20-225-R20, dated August 31, 2020), we identified and recommended the Postal Service resolve compliance issues related to facilities not completing daily all-clear checks, daily readiness self-audits, and maintaining logs for Election and Political Mail. These recommendations were closed based on actions from management. We also recommended the Postal Service work toward creating a separate, simplified mail product exclusively for Election Mail that would support uniform mail processing, including mandatory mailpiece tracking and proper mailpiece design. The Postal Service is currently reviewing implementation of this recommendation, and it remains open. It would not have been feasible for the Postal Service to implement a new mail product for the 2020 general election given the short timeframe before the election.

We followed up on those recommendations in this audit to determine whether the Postal Service's corrective actions were effective. During our observations, despite recent efforts by the Postal Service to communicate and educate election officials and mailers, we continued to note issues with mailpiece design, outdated addresses, and mail forwarding issues that further highlight the need for the Postal Service to create a separate, simplified mail product exclusively for Election Mail. We also found the Postal Service had improved compliance with completing the daily self-audit checklist and Election and Political Mail logs. However, facilities still did not always complete timely and accurate daily all-clears of Election Mail certifications and further corrective action should be taken.

Recommendations

We recommended management:

- Work with mailers of Election Mail to identify why full-service ballots from the 2020 general election were excluded from service performance measurement and develop an action plan with timelines to address each cause to increase the number of ballots in measurement.

- Continue to educate state and local election officials on mailing deadlines for request and receipt of ballots that accounts for the Postal Service's time to process, transport, and deliver mail.

- Issue clear guidance in writing and via stand-up talks ahead of the next election for daily all-clear certifications, and ensure Election Mail processes and policies are communicated quickly, clearly, and directly to all levels of management.

- Create a way to capture the separate morning and evening daily all-clear certifications for delivery units to ensure units are completing both as required.

- Conduct a post-election review to identify lessons learned and use as a reference in future elections.

Transmittal Letter

March 5, 2021

MEMORANDUM FOR: ISSAC CRONKHITE
CHIEF LOGISTICS AND PROCESSING OPERATIONS
OFFICER AND EXECUTIVE VICE PRESIDENT

THOMAS MARSHALL
GENERAL COUNSEL AND EXECUTIVE VICE PRESIDENT

KRISTIN SEAVER
CHIEF RETAIL AND DELIVERY OFFICER AND EXECUTIVE
VICE PRESIDENT

JEFFREY JOHNSON
VICE PRESIDENT ENTERPRISE ANALYTICS

FROM: Melinda Perez
Deputy Assistant Inspector General
 for Mission Operations

SUBJECT: Audit Report – Service Performance of Election and Political
Mail During the November 2020 General Election
(Report Number 20-318-R21)

This report presents the results of our audit of the Service Performance of Election and Political Mail During the November 2020 General Election. The report also evaluated the handling of mail for the Georgia Senate runoff election held on January 5, 2021.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Todd Watson, Director, Network Processing, or me at 703-248-2100.

Attachment

cc: Corporate Audit Response Management
Postmaster General

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the Service Performance of Election and Political Mail During the November 2020 General Election (Project Number 20-318). Our objective was to evaluate the U.S. Postal Service's service performance of Election and Political Mail during the November 2020 general election. See Appendix A for additional information about this audit. See Appendix B for information about the Georgia Senate runoff election held on January 5, 2021.

Background

The Postal Service plays a vital role in the American democratic process and this role continues to grow as the volume of Election and Political Mail increases. Election Mail is any mailpiece that an authorized election official creates for voters participating in the election process and includes ballots and voter registration materials. Political Mail is any mailpiece created by a registered political candidate, a campaign committee, or committee of a political party for political campaign purposes.

Depending on the preference of the customer, Election and Political Mail can be sent as either First-Class Mail, which typically takes 2 to 5 days to be delivered, or Marketing Mail, which typically takes 3 to 10 days to be delivered. However, ballots returned by voters are generally sent as First-Class Mail. While Marketing Mail has longer processing and delivery timeframes, it costs the customer less than First-Class Mail. Historically, as election day draws nearer the Postal Service has processed Election Mail in line with First-Class Mail delivery standards, even if it was sent as Marketing Mail.

Due to the COVID-19 pandemic, there was an increase in the number of Americans who voted by mail[1] in the 2020 general election. According to the U.S. Elections Project, there were over 159.6 million ballots counted in the 2020 general election.[2] According to Postal Service data, it processed and delivered at least 135 million ballots[3] going to and coming from voters from September 1 through November 3, 2020.[4]

It is important to note that the Postal Service can currently only track the performance of processed mailpieces (i.e., sorted, transported, and delivered) if they have barcode mail tracking technology and receive required processing scans. The total number of ballots processed without a barcode[5] is unknown.

This audit evaluated the Postal Service's performance leading up to and during the general election. To do so, in October, we conducted unannounced site visits at 102 processing plants and 1,710 delivery/retail units, covering all 50 states, the District of Columbia, and Puerto Rico. During the week of the general election, we conducted daily announced site visits at 27 processing plants and 56 delivery/retail units. We also observed international Election Mail operations at the Chicago, New York, Los Angeles, San Francisco, and Miami International Service Centers (ISC) during the 2020 general election and Georgia Senate runoff election. Due to different processing procedures for international ballots, we will issue a separate report on the ISCs.

This audit also reviewed the effectiveness of actions that the Postal Service took as a result of our previous audit, *Processing Readiness of Election and Political Mail During the 2020 General Elections* (Report Number 20-225-R20, dated August 31, 2020). In the prior audit, we found issues surrounding the integration of stakeholder

> *" According to Postal Service data, it processed and delivered at least 135 million ballots going to and coming from voters from September 1 through November 3, 2020."*

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1   Vote by mail occurs when voters receive or return their ballots through the mail.
2   McDonald, M. (2020, December 16) United States Election Project., www.electproject.org.
3   This only includes mailpieces that could be identified as ballots from September 1 through November 3, 2020, through Postal Service's Informed Visibility (IV) database.
4   Some ballots were likely counted twice. Once going from the election office to the voter, and a second time going from the voter back to the election office.
5   As cited in the *Processing Readiness of Election and Political Mail During the 2020 General Elections* report (Report Number 20-225-R20, dated August 31, 2020), Postal Service management stated that some election boards have chosen to continue using excess stock of ballot envelopes that do not have barcodes and some lack the funding for integrating the use of barcodes in their mailing processes.

processes with Postal Service processes to help ensure timely delivery of Election and Political Mail. These potential issues included: ballot tracking not on all mailpieces, improper mailpiece design, and varying postmark requirements. We also identified and recommended the Postal Service resolve compliance issues related to facilities not completing daily all-clear checks, daily readiness self-audits, and maintaining logs for Election and Political Mail.

Finding #1: Postal Service Performance During the 2020 General Election

The Postal Service prioritized processing of Election Mail during the 2020 general election, significantly improving timeliness over the 2018 mid-term election even with significantly increased volumes of Election Mail in the mailstream. Although timeliness was slightly below goals, proper handling and timely delivery of all Election Mail, especially ballots, was the number one priority of the Postal Service. The Postal Service also leveraged high-cost efforts such as extra transportation and overtime to improve delivery performance. Further, while our site visits did identify some delayed Election Mail and compliance issues, the Postal Service took immediate corrective actions to address the identified issues. Although ballots were generally processed timely, we did find opportunities for the Postal Service to increase the volume of ballots included in service performance and improve its communication on Election Mail guidance and processes.

Additional Resources and Extraordinary Measures Implemented by the Postal Service

On August 18, 2020, the Postmaster General (PMG) reiterated the Postal Service's critical role and commitment to delivering Election Mail, and stated that on October 1, 2020, the Postal Service would engage standby resources in all areas of operations, including transportation, to satisfy any unforeseen demand related to Election Mail. Additionally, the PMG expanded the Election Mail Task Force to include leaders of the postal unions and management associations to ensure that election officials and voters are well informed and fully supported by the Postal Service.

Further, on August 21, 2020, the Postal Service Board of Governors established a bipartisan Election Mail Committee to oversee the Postal Service's support of the mail-in voting process.

On September 21, 2020, a federal court required the Postal Service to take several actions, including:

- Treating all Election Mail as First-Class Mail as capacity allows, even if sent as Marketing Mail.

- Pre-approving all overtime from October 26 through November 6, 2020.

- Clarifying that late and extra trips are not banned, but encouraged for the prompt delivery of Election Mail.

"Although timeliness was slightly below goals, proper handling and timely delivery of all Election Mail, especially ballots, was the number one priority of the Postal Service."

Postal Service management was required to implement these orders by September 25, 2020. Even though these requirements were set forth in the court order, the Postal Service has historically implemented extraordinary measures to ensure timely delivery of Election Mail. While Election Mail can be sent as Marketing Mail, the Postal Service typically advances Election Mail and processes it in line with First-Class Mail delivery standards as election day draws nearer. Further, the Postal Service has used extra transportation and overtime as necessary.

On September 25, 2020, the Postal Service issued a directive authorizing and instructing the use of additional resources across operations to ensure the timely processing, transportation, and delivery of Election Mail. These additional resources included:

- Expanding processing times to ensure that all Election Mail was processed timely, as necessary.

- Advancing all Election Mail entered as Marketing Mail and processing it in line with First-Class Mail delivery standards.

- Allowing for early cancellations the week before election day to ensure all collected ballots were processed timely.

- Scheduling extra transportation, to include extra trips, from all points of processing and delivery, as necessary.

- Making extra delivery and collection trips.

- Adding overtime hours, as necessary.

Finally, on September 30, 2020, the Postal Service established a Command Center to provide guidance and answer questions on election-related issues. In addition, beginning October 26, 2020, the Postal Service implemented extraordinary measures to accelerate the delivery of ballots to ensure they were included in the election process. Examples of retail and delivery measures implemented include:

- Expediting delivery of ballots using Express Mail.

- Postmarking and sorting ballots for local delivery at delivery units, rather than sending the ballots to mail processing facilities.

- Establishing ballot postmark-only lines at retail counters, and/or drive-through ballot postmark/drop options, if necessary, to manage high volumes.

- Running early collections on November 2 and November 3.

- Coordinating after-hours handoffs with election boards.

During this period, from September through October 2020, we found overall extra transportation trips increased by 35.1 percent (see Figure 1) and overtime associated with mail processing, delivery, and customer service increased by 29.8 percent (see Figure 2).

Figure 1. Extra Trips, September to October 2020
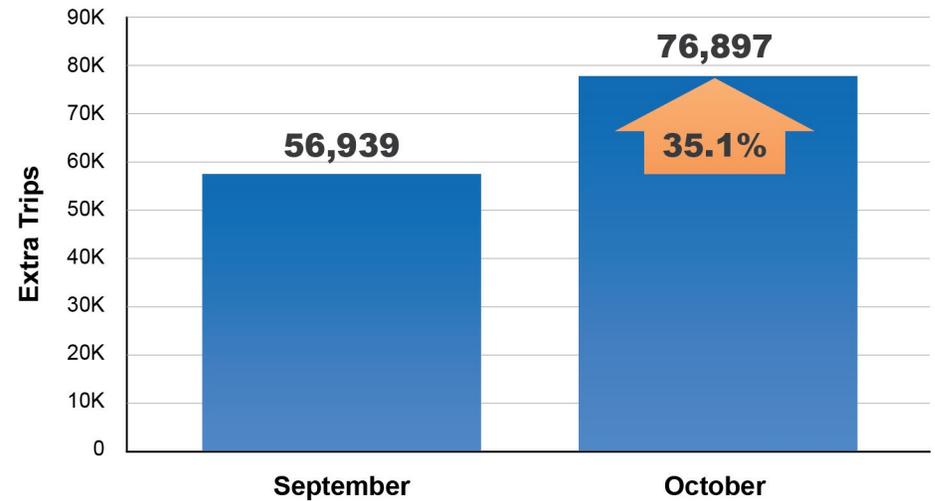
Source: U.S. Postal Service Office of Inspector General (OIG) analysis of Postal Service's Surface Visibility System.

Figure 2. Overtime Hours, September to October 2020
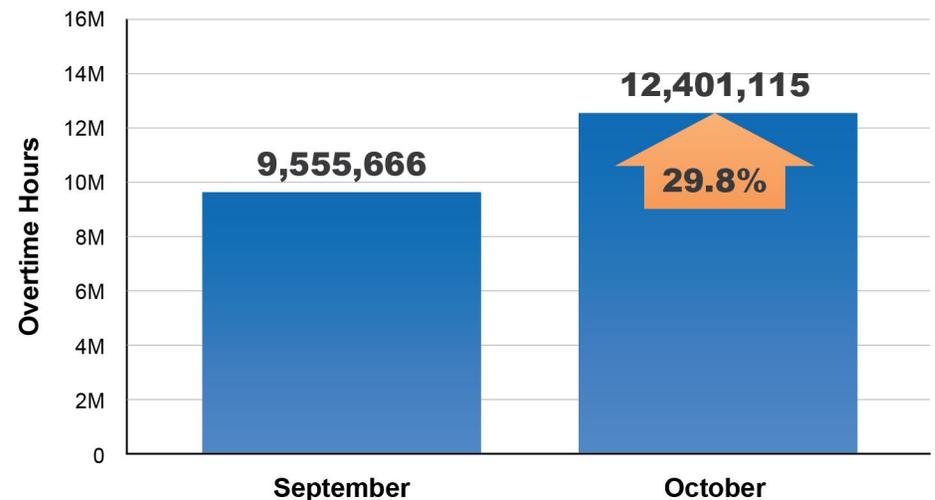
Source: OIG analysis of Postal Service's Labor and Utilization Report.

Ballots Not Measured in Service Performance

The Postal Service encouraged election officials to take advantage of its barcode tracking capabilities to increase the electronic visibility of the ballots in the mailstream and to assist in the processing and delivery of ballots.[6] However, the Postal Service was only able to measure service performance from 71.5 million (or 52.9 percent) of the 135 million identifiable ballots in Postal Service data. This occurred, in part, because the Postal Service can measure service performance on outbound ballots – ballots going to voters from election officials – only if the ballots are sent full-service[7] and receive necessary processing scans to provide end-to-end visibility into the mailstream. However, the Postal Service does not require election officials to use full-service on ballots.[8]

Specifically, about 43.5 million ballots were sent to voters without unique barcodes and thus excluded from measurement. An additional 20.3 million ballots sent as full-service to voters were excluded because they did not comply with business rules or were missing key scan data to be included in service performance measurement. Mailpieces can be excluded from service performance measurement because of mailer or Postal Service issues. While the Postal Service tracks reasons why full-service mailpieces are excluded from service performance measurement, they do not track them specifically for ballots. Therefore,

> "The Postal Service was only able to measure service performance from 71.5 million (or 52.9 percent) of the 135 million identifiable ballots in Postal Service data."

they could not provide reasons why these full-service ballots were excluded from service performance measurement.

In a previous report[9], we found through the first three quarters of fiscal year (FY) 2019, the Postal Service excluded 17.4 billion mailpieces, or 23.4 percent from service performance measurement. The Postal Service had identified 15 reason categories for exclusions, such as no start-the-clock[10], no piece scan[11], and long haul[12], which accounted for almost 74 percent of excluded mail in the first three quarters of FY 2019.

When ballots are not sent full-service, and excluded from service performance measurement, the Postal Service does not have complete service performance information needed to diagnose specific mail processing issues and implement countermeasures to fix mail flow problems. In addition, it reduces the benefits of using barcodes, including tracking the delivery and return of ballots, for the Postal Service, election officials, and mailers.

Service Performance of Election and Political Mail, and Ballots Delivered After Election

From September 1 through November 3, 2020, the Postal Service processed almost 134 million pieces[13] of Election Mail included in service performance measurement (pieces with barcode mail tracking technology that received required processing scans for measuring performance) and over 1.6 billion pieces of Political Mail included in service performance measurement. The amount of Election Mail processed in time to meet its service standard[14] was 93.8 percent, an increase of about 11 percentage points for Election Mail processed from the same period in 2018. While this is lower than the Postal Service's goal to have 96 percent of First-Class Mail[15] processed on time, it was 5.6 percentage points

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6   State and Local Election Mail – User's Guide Publication 632 – dated January 2020.
7   Full-service mail combines the use of unique barcodes with the provision of electronic information regarding the makeup and preparation of mail, which provides end-to-end visibility into the mailstream.
8   The Postal Service offers the mailing industry two Intelligent Mail options for automation discounts: basic-service and full-service.
9   *Mail Excluded from Service Performance Measurement* (Report Number 19XG009NO000, dated December 13, 2019).
10   The recorded date and time when a mailpiece enters the mailstream, and starting the clock for measuring its service performance.
11   A no piece scan occurs when there is no processing scan for the mailpiece.
12   A long haul exclusion occurs when a mailpiece at a mailer's facility, or detached mail unit, is transported by the Postal Service to a mail processing facility in a different Postal Service District. A detached mail unit is an area in a mailer's facility where postal employees perform mail verification, acceptance, dispatch, and other postal functions.
13   The 134 million Election Mail pieces in service performance measurement includes the 71.5 million ballots with barcode tracking that received the required processing scans.
14   The stated delivery performance goals for each mail class and product that are usually measured by days for the period of time taken by the Postal Service to handle mail from the point of entry to delivery.
15   Election Mail is generally sent and processed in line with First-Class Mail delivery standards as election day draws nearer.

higher than all other First-Class Mail processed on-time, showing prioritization of this mail (see Table 1). Further, as noted in our previous reports[16], the Postal Service has not met its First-Class Mail service goal in five years.

Table 1. Election Mail Service Performance Exceeded First-Class Mail Scores, September 1 – November 3, 2020

Mail Type	Mailpieces	Percentage Processed On Time
Election Mail	133,772,172	93.8%
All Other First-Class Mail	6,395,986,390	88.1%

Source: OIG analysis of Postal Service's Informed Visibility (IV) data as of December 18, 2020.

Conversely, Political Mail (e.g., advertisements for political candidates) processed in time to meet its service standard was 91.9 percent — a decrease of about 3 percentage points from the same period in 2018. This met the goal for Marketing Mail[17] of 91.8 percent on-time and was 2.6 percentage points higher than all other Marketing Mail processed on time (see Table 2).

Table 2. Political Mail Service Performance Exceeded Marketing Mail Scores, September 1 – November 3, 2020

Mail Type	Mailpieces	Percentage Processed On Time
Political Mail	1,641,517,208	91.9%
All Other Marketing Mail	7,846,300,741	89.3%

Source: OIG analysis of Postal Service's IV data as of December 18, 2020.

Prior to the election, the Postal Service reached out to states which had ballot request deadlines that were too close to the election and did not allow enough time for the Postal Service to process and deliver the ballot within normal service standard timeframes. Further, the Postal Service sent a postcard to every address advising voters to check their state requirements for voting by mail. They recommended voters request absentee ballots at least 15 days before election day and return ballots at least 7 days before election day. However, according to Postal Service data, 28,172 ballots were sent to voters from election offices within 4 days of the election. Sending out ballots this late does not typically provide the Postal Service the required time to process, transport, and deliver the ballots within the First-Class Mail service standard of 2 to 5 days. However, due to extraordinary measures implemented by the Postal Service, over 94 percent of those ballots were delivered to voters on or before election day. Only 1,567 ballots were delivered to voters after the election, 1,548 of which were delivered within service standards. Of upmost importance, during the week of the general election, 98.1 percent of identifiable ballots were processed in time to meet its service standard. See Appendix C on the methodology used to determine the amount of ballots processed in time the week of the election to meet its service standard.

Pre-Election Site Observations

During the month of October 2020, we conducted observations at processing facilities and delivery/retail units across the country to determine if the Postal Service was processing and delivering Election Mail timely and complying with election procedures. The election procedures we reviewed included:

- Identifying Delayed Election Mail – Mail that is not processed in time to meet its established delivery day.

"Of upmost importance, during the week of the general election, 98.1 percent of identifiable ballots were processed in time to meet its service standard."

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16 *Assessment of the U.S. Postal Service's Service Performance and Costs* (Report Number NO-AR-19-008, dated September 17, 2019) and *U.S. Postal Service's Processing Network Optimization and Service Impacts* (Report Number 19XG013NO000-R20, dated June 16, 2020).
17 Political Mail is generally sent as Marketing Mail.

> *"We found that Postal Service management at the 102 mail processing facilities we observed generally complied with Election Mail procedures."*

- Reviewing Daily All Clears – The Postal Service requires mail processing facilities and delivery/retail units to certify that they are clear of all committed (scheduled) Election and Political Mail during the specified timeframe (two weeks before and two weeks after the election). Mail processing facilities are required to complete the certification by 10 a.m. daily, while delivery/retail units are required to certify twice each day, the first by 2 p.m. and the second at the end of the day.

- Reviewing Election and Political Mail Log – The Postal Service requires mail processing facilities and delivery/retail units to record and track all Election and Political Mail as it moves through their network.[18]

- Ensuring Postmark Processing – The Postal Service requires all ballots to be postmarked.[19] Additionally, ballots are required to be postmarked at a retail unit if requested by a customer.[20]

- Reviewing Election/Political Mail Staging Area – The Postal Service requires mail processing facilities to maintain a staging area for Election and Political Mail.[21]

We conducted 102 mail processing facility and 1,710 delivery/retail unit observations during October 2020. While the majority of Election Mail observed was processed and delivered timely, we did identify compliance issues at both mail processing facilities and delivery/retail units.

We found that Postal Service management at the 102 mail processing facilities we observed generally complied with Election Mail procedures. However, we identified compliance issues during 30[22] of the 102 mail processing facility observations (or 29 percent), including delayed Election Mail, not completing daily all-clear checks, postmark issues, and facilities not having Election/Political Mail Staging areas.

We also found that during the 1,710 delivery/retail unit observations, Postal Service management generally complied with Election Mail procedures. However, we identified compliance issues during 234[23] of the 1,710 delivery/retail unit observations (or about 14 percent), including delayed Election Mail, not completing daily all-clear checks, and postmark issues (see Table 3).

Table 3. Mail Processing Facility and Delivery/Retail Units Compliance With Election Mail Procedures During our Pre-Election Observations

Election Mail Procedure Reviewed	Mail Processing Facilities		Delivery/Retail Units	
	Number in Compliance (out of 102)	Percentage	Number in Compliance (out of 1,710)	Percentage
Clear of Committed Election Mail	81	79.4%	1,652	96.6%
Completed Daily All-Clear	95	93.1%	1,607	94.0%
Maintained Election and Political Mail Log	102	100.0%	1,682	98.4%

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18 Processing Operations Management Order (POMO) Number POMO-007-20, dated July 29, 2020.
19 Memorandum from Chief Operating Officer and Executive Vice President, dated April 23, 2018.
20 Memorandum from Chief Retail and Delivery Officer and Executive Vice President, dated October 7, 2020.
21 Political and Election Mail Audit Checklist, POMO-007-20, dated July 29, 2020.
22 Some facilities had more than one compliance issue.
23 Some units had more than one compliance issue.

Election Mail Procedure Reviewed	Mail Processing Facilities		Delivery/Retail Units	
	Number in Compliance (out of 102)	Percentage	Number in Compliance (out of 1,710)	Percentage
Postmarks	85*	97.7%	1,636**	96.0%
Maintained Election/ Political Mail Staging Area	99	97.1%	N/A	N/A

Source: OIG observations.
*Number in compliance out of 87 units. Some mail processing facilities did not have cancellation operations (i.e., sent mail to other facilities to receive postmark). Two facilities pulled ballots from the mailstream and not all were postmarked.
**Number in compliance out of 1,705 units. Five delivery units did not have retail units. Most units not in compliance were not postmarking ballots when customers requested.

Delayed Election Mail

We found committed Election Mail remained at a mail processing facility during 21 observations which totaled 17,285 delayed mailpieces. Six of these facilities accounted for 16,914 (or 97.9 percent) of the delayed mailpieces (see Table 4). Management stated they experienced significant challenges with ballot envelope design (e.g., envelope quality, oversized ballot envelopes, barcode issues, and address issues) causing some Election Mail to be delayed. During our observations, Postal Service management expedited the processing of all identified delayed Election Mail, and it is likely that all mailpieces were delivered by election day.

> *"We found committed Election Mail remained at a mail processing facility during 21 observations which totaled 17,285 delayed mailpieces."*

Table 4. Delayed Election Mail Identified at Mail Processing Facilities During our Pre-Election Observations

Date of Observation	Mail Processing Facility	Delayed Election Mailpieces	Total Letters Processed
10/7/2020	Harrisburg, PA	1,818	3,353,243
10/8/2020	Des Moines, IA	4,848	1,895,594
10/10/2020	Missoula, MT	3,000	395,105
10/13/2020	Detroit, MI	1,515	3,904,854
10/14/2020	Salt Lake City, UT	3,333	2,306,020
10/15/2020	Cleveland, OH	2,400	4,114,351
Various	15 Other Facilities	371	61,310,803
Total		**17,285**	**77,279,970**

Source: OIG observations.

We found committed Election Mail remained at a delivery unit during 58 observations which totaled 25,911 delayed mailpieces. One unit accounted for 15,824 (or 61.1 percent) of the delayed mailpieces (see Table 5).

Table 5. Delayed Election Mail Identified at Delivery Units During our Pre-Election Observations

Delayed Election Mailpieces	Number of Delivery Units	Total Delayed Election Mail
>15,000	1	15,824
1,000 – 15,000	3	8,005
100 – 999	6	1,391

Delayed Election Mailpieces	Number of Delivery Units	Total Delayed Election Mail
50 – 99	4	327
20 – 49	6	188
<20	38	176
Total	**58**	**25,911**

Source: OIG observations.

Postal Service management stated the delays were due to insufficient staffing and increased labor needed to manually sort Election Mail mailpieces. Again, during our observations, Postal Service management expedited the delivery of all identified delayed Election Mail, and it is likely that all mailpieces were delivered by election day.

Daily All-Clear

We found Postal Service management did not complete the daily all-clear check of Election Mail during seven mail processing facility and 103 delivery/retail unit observations. Mail processing facility management indicated they did not complete all-clears on time due to heavy mail volume and lack of employee availability impacted by COVID-19 quarantines. Further, of the 21 mail processing facilities with delayed Election Mail, we found a total of 7,870 delayed mailpieces at 15 mail processing facilities that certified they were all-clear of all committed Election Mail the day of our observation. This indicates the sites did not check for delayed mailpieces or they certified they were clear knowing they were not. In review of nationwide data on daily all-clear certifications, we found mail processing facilities were generally in compliance with the requirement to complete the daily all-clear check by 10 a.m. From October 5 through November 4, 2020, we found 741 (or 8.1 percent) instances of facilities not certifying before 10 a.m., or not certifying at all.

For our delivery/retail unit observations, many were conducted between 10 a.m. and 3 p.m. and some occurred before the required time[24] to complete the all-clear checks. The units are required to complete a daytime and evening all-clear certification, but the Postal Service system only shows the time of the last certification entered for the day. While it is possible daytime all-clear checks could have been completed at these units after our visit, there was no Postal Service system record to verify the all-clear certifications occurrence. We also found local management was not always aware of what time daily all-clears had to be completed. Specifically, before the election, the Postal Service changed delivery/retail unit daily all-clear procedures to a two-phase certification. The first phase of certification was required by 2 p.m., which is after carriers left for delivery, while the second phase was required after carriers had returned for the day. Some delivery unit managers were certifying the all-clear of Election Mail for the entire day prior to carriers leaving for the day with the mail. Specifically, we found 120,317 instances (or about 15 percent) of delivery units submitting daily all-clear certifications prior to 8 a.m., indicating these were not completed according to policy.

General Election Week Site Observations

During the week of the election (November 2 through November 4, 2020), we conducted a total of 250 daily observations at 27 mail processing facilities and 57[25] delivery/retail units. While some compliance issues existed (see Table 6), we

> *"Further, of the 21 mail processing facilities with delayed Election Mail, we found a total of 7,870 delayed mailpieces at 15 mail processing facilities that certified they were all-clear of all committed Election Mail the day of our observation."*

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24   Delivery/retail units are required to certify they are clear of committed Election Mail by 2 p.m. and at the end of the day.
25   We visited the Miami, FL West Carrier Annex just once on November 3, 2020 – the remaining 56 delivery/retail units were visited all three days from November 2 to 4, 2020.

identified a total of 760 delayed Election Mail mailpieces, which were delivered to election offices on or before election day.

Table 6. Mail Processing Facility and Delivery/Retail Unit Compliance With Election Mail Procedures, November 2 – 4, 2020

Election Mail Procedure Reviewed	Mail Processing Facilities		Delivery/Retail Units	
	Number in Compliance (out of 81)	Percentage	Number in Compliance (out of 169)	Percentage
Clear of Committed Election Mail	63	77.8%	162	95.9%
Completed Daily All-Clear	76	93.8%	151	89.3%
Maintained Election and Political Mail Log	81	100.0%	168	99.4%
Postmarks	67*	97.1%	152*	99.3%
Maintained Election/ Political Mail Staging Area	80**	98.8%	N/A	N/A

Source: OIG observations.
*Number in compliance during 69 and 153 observations, respectively. Some mail processing facilities did not have cancellation operations (i.e. sent mail to other facilities to receive postmark) and some delivery units did not have retail units.
**The one facility that did not have a staging area on our first day of observation, immediately set one up.

We provided daily and weekly updates to the Postal Service management, Board of Governors, and Congress on the results of our observations and the Postal Service took immediate corrective action to address the issues identified.

Although management responded to challenges quickly, we did note communication on Election Mail guidance and process changes did not always reach local facility management quickly and effectively. Along with the communication issues surrounding the daily all-clear requirement previously noted, there were also communication issues regarding postmark requirements. Management at some delivery/retail units stated they would not postmark a ballot even if requested by a customer based on instructions from District management. Others stated they had been told that postmarking would only be applied at mail processing facilities, and therefore did not postmark ballots upon request. However, this contradicts Postal Service policy.[26] By not always following Election Mail processes and without quick and effective communication, the Postal Service risked delaying Election Mail.

Actions Implemented from Prior Audit Recommendations

In our recent *Processing Readiness of Election and Political Mail During the 2020 General Elections* audit (Report Number 20-225-R20, dated August 31, 2020), we identified and recommended the Postal Service resolve compliance issues related to facilities not completing daily all clear checks, daily readiness self-audits, and maintaining logs for Election and Political Mail. These recommendations were closed based on actions from management. We also recommended the Postal Service work toward creating a separate, simplified mail product exclusively for Election Mail that would support uniform mail processing, including mandatory mailpiece tracking and proper mailpiece design. The Postal Service is currently reviewing implementation of this recommendation, and it remains open. It would not have been feasible for the Postal Service to implement a new mail product for the 2020 general election given the short timeframe before the election.

> *"We provided daily and weekly updates to the Postal Service management, Board of Governors, and Congress on the results of our observations and the Postal Service took immediate corrective action to address the issues identified."*

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26   Memorandum from Chief Operating Officer and Executive Vice President, dated April 23, 2018, and Memorandum from Chief Retail and Delivery Officer and Executive Vice President, dated October 7, 2020.

> *"During our observations, despite recent efforts by the Postal Service to communicate and educate election officials and mailers, we continued to note issues with mailpiece design, outdated addresses, and mail forwarding issues."*

We followed up on those recommendations made in the prior audit to determine whether corrective actions the Postal Service took were effective. During our observations, despite recent efforts by the Postal Service to communicate and educate election officials and mailers, we continued to note issues with mailpiece design, outdated addresses, and mail forwarding issues. In our October observations, 26 of 102 (or 25.5 percent) mail processing facilities reported they had experienced significant issues with ballots, such as envelope quality, oversized ballot envelopes, barcode issues, and address issues. Only 4 of 27 (or 14.8 percent) experienced significant issues during our election week observations. These issues continue to support the need for the Postal Service to create a separate simplified Election Mail product that supports uniform processing.

We also found the Postal Service had improved compliance with completing the daily self-audit checklist and Election and Political Mail logs. However, facilities still did not always complete timely and accurate daily all-clears of Election Mail certifications and further corrective action should be taken.

Recommendation #1
We recommend the **Chief Logistics and Processing Operations Officer,** and **Vice President Enterprise Analytics** work with mailers of Election Mail to identify why full-service ballots from the 2020 general election were excluded from service performance measurement and develop an action plan with timelines to address each cause to increase the number of ballots in measurement.

Recommendation #2
We recommend the **General Counsel** continue to educate state and local election officials on mailing deadlines for request and receipt of ballots that accounts for the Postal Service's time to process, transport, and deliver mail.

Recommendation #3
We recommend the **Chief Logistics and Processing Operations Officer** and the **Chief Retail and Delivery Officer** issue clear guidance in writing and via stand-up talks ahead of the next election for daily all-clear certifications, and ensure Election Mail processes and policies are communicated quickly, clearly, and directly to all levels of management.

Recommendation #4
We recommend the **Chief Retail and Delivery Officer** create a way to capture the separate morning and evening daily all-clear certifications for delivery units to ensure units are completing both as required.

Recommendation #5
We recommend the **Chief Logistics and Processing Operations Officer** and the **Chief Retail and Delivery Officer** conduct a post-election review to identify lessons learned and use as a reference in future elections.

Management's Comments

Management largely agreed with the finding; agreed with recommendations 1, 2, 3, and 5; and partially agreed with recommendation 4. They also provided further details/comments on the additional resources and extraordinary measures, ballots not measured in service performance, service performance of Election Mail, site observations, and actions implemented from prior audit recommendations. See Appendix D for management's comments in their entirety.

Regarding recommendation 1, management stated a Mailers' Technical Advisory Committee work group was created in April 2020 to address potential reasons why full-service mail is excluded from service performance measurement. This group works with mailers to identify root causes of exclusions and works to resolve them. The Postal Service is also working with the industry to develop a dashboard that will allow mailers insight into the volume of mail being excluded,

exclusion reasons, and the mail processing facility accepting the mail, along with various other metrics. The target implementation date to provide an update on their efforts is December 31, 2021.

Regarding recommendation 2, management stated they will continue to provide resources and conduct outreach to election officials to ensure they understand the Postal Service's time to process, transport, and deliver mail. The target implementation date to provide an update on their efforts is December 31, 2021.

Regarding recommendation 3, management stated the process for completing daily all clears and Election Mail processes and procedures will be communicated quickly, clearly, and directly to all levels of management prior to future elections. The target implementation date is April 2, 2021.

Regarding recommendation 4, management stated that if the morning and evening all-clear certifications remains the process in future elections, they will develop a solution to separate the reports. However, they noted new methods or technology may be used that may not require an all-clear certification. The target implementation date is April 2, 2021.

Regarding recommendation 5, management stated they conducted an after-action review on January 12, 2021, and will apply lessons learned in future elections. Therefore, this recommendation has been implemented.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations in the report and the corrective 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. Recommendations 1, 2, 3, and 4 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 consider recommendation 5 closed with the issuance of this report.

Appendices

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

Appendix A: Additional Information

Scope and Methodology

The scope of our audit was the Postal Service's service performance of Election and Political Mail during the November 2020 general election. To accomplish our objective, we:

- Analyzed Postal Service data on Election and Political Mail service performance from September 1 to November 3, 2020, comparing to the same period in 2018.

- Reviewed Postal Service's Election and Political Mail processing and delivery strategies, policies, procedures, and related documents and tools.

- Judgmentally selected and conducted unannounced site observations at 102 mail processing facilities and 1,710 delivery/retail units in October 2020. We selected facilities in every state, the District of Columbia, and Puerto Rico.

- Judgmentally selected and conducted announced site observations at 27 mail processing facilities and 56 delivery/retail units from states that were projected to play a key role in the outcome of the election. We reviewed these sites daily from November 2 through November 4, 2020.

- Inspected mail processing facilities and delivery/retail units to determine if they:
  - Performed daily all-clears to ensure Election Mail had been processed and was not delayed.
  - Completed daily Election and Political Mail audits and logbooks.
  - Had any delayed ballots.
  - Experienced any significant challenges with ballots.
  - Followed ballot postmarking processes.

- Interviewed Postal Service Headquarters officials on additional resources used, and extraordinary measures implemented for the general election.

- Reviewed the effectiveness of actions taken by the Postal Service in response to findings and recommendations in the *Processing Readiness of Election and Political Mail During the 2020 General Elections* report (Report Number 20-225-R20, dated August 31, 2020) audit.

We conducted this performance audit from September 2020 through March 2021 in accordance with the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation. 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 February 3, 2021, and included their comments where appropriate.

We assessed the reliability of computer-processed data from Informed Visibility by interviewing agency officials knowledgeable about the data, and comparing the data with other related data. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
Processing Readiness of Election and Political Mail During the 2020 General Elections	Evaluate the Postal Service's readiness for timely processing of Election and Political Mail for the 2020 General Elections.	20-225-R20	8/31/2020	None
Management Alert - Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area	Determine the cause of delayed ballot mail in the Milwaukee, WI P&DC service area for the spring election and presidential primary of April 7, 2020.	20-235-R20	7/7/2020	None
Service Performance of Election and Political Mail During the 2018 Midterm and Special Elections	Evaluate the Postal Service's performance in processing Election and Political Mail for the 2018 midterm and special elections.	19XG010NO000-R20	11/4/2019	None
Processing Readiness for Election and Political Mail for the 2018 Midterm Elections	Evaluate the Postal Service's readiness for timely processing of Election and Political Mail for the 2018 Midterm Elections.	NO-AR-18-007	6/5/2018	None

Appendix B: Georgia Senate Runoff Election

We evaluated Postal Service's performance and compliance with election procedures leading up to and during the Georgia Senate runoff election, which was held on January 5, 2021. To do so, in December 2020, we conducted unannounced site visits at seven processing plants – covering plants across Georgia, Florida, and Tennessee that service Georgia zip codes – and 126 delivery/retail unit observations. During the week of the runoff election (January 4 through January 6, 2021), we conducted daily site visits at the same seven processing plants and 15 delivery/retail units.[27]

Overall, the Postal Service performed well during the Georgia Senate runoff election. Most of the Election Mail observed was processed and delivered timely, but the Postal Service continued to have similar compliance issues (e.g., lack of understanding of requirements for daily all-clear certifications and postmark requirements) and causes for delayed mail that we previously identified during the general election. This further supports our recommendations in this report to help ensure Election Mail processes and policies are communicated quickly, clearly, and directly to all levels of management.

Georgia Senate Runoff Site Observations

From December 1, 2020 to January 6, 2021, we conducted a total of 198 observations – 28 at mail processing facilities and 170 at delivery/retail units servicing Georgia. We found the Postal Service generally complied with Election Mail procedures. However, we identified compliance issues during six (or 21.4 percent) of the 28 mail processing facility observations, and 29 (or 17.1 percent) of the 170 delivery/retail unit observations.[28] This included delayed election mail, not completing daily all-clear checks, not maintaining election and political mail logs, and not postmarking as required (see Table 7).

Table 7. Mail Processing Facility and Delivery/Retail Unit Compliance With Election Mail Procedures, December 1, 2020 – January 6, 2021

Election Mail Procedure Reviewed	Mail Processing Facilities		Delivery/Retail Units	
	Number in Compliance (out of 28)	Percentage	Number in Compliance (out of 170)	Percentage
Clear of Committed Election Mail	22	78.6%	161	94.7%
Completed Daily All-Clear	27	96.4%	156	91.8%
Maintained Election and Political Mail Log	28	100%	163	95.9%
Postmarks	24*	100%	166**	98.2%
Maintained Election/Political Mail Staging Area	28	100%	N/A	N/A

Source: OIG observations.
*Number in compliance out of 24 mail processing facility observations. One facility, in which we conducted four observations, did not have cancellation operations (i.e., sent mail to other facilities to receive postmark).
**Number in compliance out of 169 observations. One delivery unit did not have a retail unit. Units not in compliance were not postmarking ballots when requested to by customers.

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27 On January 4, 2021, we conducted site visits to only 14 delivery/retail units.
28 Some facilities and units had more than one compliance issue.

Further, our observations found 4,662 pieces of delayed Election Mail at mail processing facilities and delivery/retail units. Most of the delayed Election Mail was at mail processing facilities, where we found a total of 4,334 delayed mailpieces during six observations. Mail processing management stated they experienced significant challenges due to transportation issues, congested docks, and ballot envelope design (e.g., barcode issues and address issues) causing some Election Mail to be delayed. Of the 4,334 delayed mailpieces, only 24 were delivered after election day.[29]

The remaining 328 delayed mailpieces were found at delivery/retail units during nine observations. The delayed mail either arrived co-mingled with other mail and required the delivery unit to manually sort through trays, or arrived at the delivery unit from the mail processing facility after the election office picked up their mail for the day. While these 328 mailpieces were delayed, only one ballot was not delivered by election day.

29 The 24 delayed mailpieces were identified on January 6, 2020.

Service Performance of Election and Political Mail During the November 2020 General Election
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Appendix C: Processing Performance Score Measurement

The Postal Service calculates processing performance scores for mailpieces by using mail processing machine scans from the start-the-clock (STC)[30] date to the anticipated date of delivery (ADD)[31], relative to the service standard. When selecting a time period for review, the number and amount of on-time mailpieces can vary significantly depending on if the time period was based on when mailpieces were entered into the mailstream (STC date) versus when they were delivered (ADD date).[32] Therefore, depending on what method of measurement is used and the time period reviewed, material differences in processing performance scores can exist.

Given a specific date range over a short period of time, like the week before the general election, the STC date is more representative of processing performance as it evaluates all mailpieces that entered the mailstream on a given date, regardless of when they were delivered. On the other hand, the ADD date evaluates all mailpieces based on when they were delivered even if they entered the mailstream and already missed service before the start of your date range. Over a short period of time, the ADD date is likely to include STC dates before the period under review and may have a higher concentration of mailpieces that did not meet the service standard versus on-time mailpieces. This leads to scores that are not representative of true processing performance of that time period.

In this audit we evaluated processing performance of ballots for the week before the election, October 31 to November 3, 2020. Using ADD (i.e., including ballots with anticipated delivery dates between October 31 and November 3, 2020) as the basis for this date range includes 596,502 ballots (or 57 percent of total ballots in this time period) that entered the mailstream prior to October 31 and includes more ballots that missed service standards. For the ballots entered before October 31, only 84 percent were processed in time to meet the service standard (See Table 8).

Conversely, using STC (i.e., including ballots that entered the mailstream between October 31 and November 3, 2020) as the basis for this date range does not include any ballots previously in the mailstream (See Table 8). Therefore,

within our report, we used STC dates to present processing performance scores for identifiable ballots during the week of election.

Table 8. Identifiable Ballot Volume and Processing Performance Score by STC and ADD: October 31 to November 3, 2020

	Start The Clock	Anticipated Delivery Date
Ballots Mailed Before October 31, 2020	0	596,502 (56.6%)
Processing Score for Ballots Mailed Before October 31, and Delivered Between October 31 and November 3, 2020	N/A	83.7%
Ballots Mailed from October 31 to November 3, 2020	618,331 (100%)	456,885 (43.4%)
Processing Score from October 31 to November 3, 2020	98.1%	98.9%
Total Ballots	618,331	1,053,387
Total Processing Score	98.1%	90.3%

Source: U.S. Postal Service Office of Inspector General (OIG) analysis of Postal Service's Informed Visibility (IV) System.

However, over a long period of time, the concentration of mailpieces that fall outside the ADD date range and did not meet service standards will have less weight on the total population of mailpieces. In this situation, STC and ADD processing performance scores are likely to have immaterial differences.

For example, the population of Election Mail based on ADD from September 1 to November 3, 2020 includes only 5.4 million pieces (or 4.1 percent) of Election Mail that entered the mailstream prior to September 1, of which 77 percent was

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30 Start-The-Clock is the date that a mailpiece first enters the mailstream.
31 Anticipated Date of Delivery is an estimated delivery date based on the last scan a mailpiece receives with an intelligent mail barcode.
32 ADD is the official quarterly reporting method required by the Postal Regulatory Commission.

processed in time to meet the service standard (See Table 9). Therefore, within our report, we used ADD to present processing performance scores for Election Mail from September 1 to November 3, 2020.

Table 9. Identifiable Election Mail Volume and Processing Performance Score by STC and ADD: September 1 to November 3, 2020

	Start The Clock	Anticipated Delivery Date
Election Mail Included Before September 1, 2020	0	5,486,071 (4.1%)
Processing Score Before September 1, 2020	N/A	77.0%
Election Mail Included from September 1 to November 3, 2020	128,521,379 (100%)	128,286,101 (95.9%)
Processing Score from September 1 to November 3, 2020	94.5%	94.5%
Total Election Mail	128,521,379	133,772,172
Total Processing Score	94.5%	93.8%

Source: OIG analysis of Postal Service's IV System.

Appendix D: Management's Comments

UNITED STATES POSTAL SERVICE

February 25, 2021

JOSEPH WOLSKI
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Service Performance of Election and Political Mail During the 2020 General Election (Project Number 20-318)

Thank you for the opportunity to review and comment on the Office of Inspector General (OIG) audit, *Service Performance of Election and Political Mail During the 2020 General Election.* The audit found that the United States Postal Service effectively prioritized the processing and delivery of Election Mail, including ballots, during the 2020 General Election and significantly increased the timeliness of delivery over the 2018 election cycle while also delivering substantially more Election and Political Mail volume. It also made several recommendations regarding various aspects of the Postal Service's Election Mail processes.

Management largely agrees with the audit's findings and recommendations, and we reiterate our commitment to efficiently process the nation's Political and Election Mail and to timely deliver such mail. We understand, and continue to take great pride in, our important role in the electoral process. For the 2020 General Election season, as the audit suggests, the Postal Service built on our historical practices, including engaging in significant outreach with election officials nationwide; making additional resources available, including extra transportation and overtime; and implementing extraordinary measures to expedite the delivery of Election Mail. The Postal Service enhanced these efforts in 2020, both because of the anticipated increase in voters and election officials who would be using the mail as part of the election process (often for the first time) due to the ongoing COVID-19 pandemic, and to reassure the public of our unwavering commitment to the timely delivery of Election Mail in the face of heightened political scrutiny. Specifically, the Postal Service redoubled our outreach efforts to ensure close coordination with state and local officials—and particularly those with limited experience in administering elections with high volumes of mail-in votes—and, for the first time, issued organization-wide directives that memorialized and formalized the additional resources that would be used and the extraordinary measures that local management would be expected to employ to accelerate ballot delivery. The Postal Service also rapidly implemented improved internal processes for the General Election based on lessons learned during the primary season. All of these steps were planned, and many were already underway, well before any court rulings.

The success of these efforts is demonstrated by the Postal Service's overall performance. In particular, as the audit recognizes, on-time delivery of Election Mail exceeded that of First-Class Mail overall, and was significantly improved over service performance for Election Mail in the 2018 election. These results are particularly impressive considering the impact of the COVID-19 pandemic on employee availability and on Election Mail volume. It is especially noteworthy that, of the more than 135 million ballots sent through the Postal network, nearly all were delivered within seven days, with an average delivery time of 2.1 days from election officials to voters and 1.6 days from voters to election officials. While we recognize that OIG's audit has identified opportunities for further improvement and refinements, we are proud of our overall performance and of the role we played in the electoral process.

Finding # 1: Postal Service Performance During the 2020 General Election

- *Additional Resources and Extraordinary Measures Implemented by the Postal Service*

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Management largely agrees with the audit's findings on the Postal Service's performance during the 2020 General Election. The Postal Service started preparing for the 2020 Election Cycle long before that cycle began, including assembling a cross-functional Election Mail Steering Committee and selecting Political and Election Mail Coordinators and Election Mail Outreach Program Managers, who led outreach and served as primary points of contact for election officials. By the spring of 2020, an Executive Leadership Team Election Mail Steering Committee was formed, and ▮▮▮▮▮▮ was appointed to serve as the Executive Director of Election Mail and to provide day-to-day leadership over the Steering Committee. In May, ▮▮▮▮▮ formed another dedicated Election Mail workgroup that met three days per week (and seven days per week in the Fall) to exchange information and address emerging issues. The effort of these teams resulted in over 50,000 touchpoints being made with election officials, mail service providers, political parties, and other stakeholders to educate them about Postal Service processes, services, and mailing recommendations.

As the Postmaster General made clear in his August 18 remarks, the timely delivery of Election Mail during the 2020 General Election was the Postal Service's number one priority throughout the summer and fall of 2020. As the OIG notes, the effectiveness of this prioritization was demonstrated by the Postal Service achieving service scores 5.6 points above overall First-Class Mail during the same time period.

To be clear, the additional resources that the Postal Service implemented and the extraordinary measures we undertook were not in response to any litigation or court orders, but instead were planned long before that time. The Postmaster General announced on August 18, well in advance of any court rulings, that additional resources would be made available throughout the month of October through the November 3 election to ensure Election Mail was handled timely and securely. The Postal Service's directive of September 25 was designed to implement that August 18 commitment.

With regard to extraordinary measures, on August 21 the Postmaster General testified before the Senate Homeland Security and Governmental Affairs Committee that, as it has done in previous elections, the Postal Service would be deploying processes and procedures for the General Election to expedite the delivery of ballots, even faster than First-Class Mail where necessary. To clarify and codify that longstanding commitment, the Postal Service provided written and detailed guidance about the kinds of extraordinary measures that local offices would be expected to employ in the period before Election Day to expedite the delivery of Election Mail, as noted in the audit. These efforts were consistent with those undertaken in prior election cycles and during the 2020 Primary Elections.

In August, the Postmaster General also announced the creation of an additional Election Mail Task Force that expanded the existing Steering Committee to include leadership of the four major postal unions and leaders of postal management associations. Additionally, the Postal Service Board of Governors instituted an Election Mail Committee to guide the Postal Service's election related efforts.
The Postal Service instituted a Command Center during the 2020 General Election to assist field operations by answering questions, issuing guidance and instructions, and tracking compliance. In addition, the Postal Service set up a dedicated 24/7 hotline to address any questions from field operations and election officials and/or mailers. The Command Center and Hotline teams helped to ensure the Postal Service could react swiftly and accurately to any issues.

Across the field, the Postal Service enlisted the assistance of ballot ambassadors and ballot monitors to successfully execute its plans. The ballot ambassador initiative originated from the Election Mail Task Force mentioned above. The ambassadors provided additional eyes on the process in each facility and facilitated strong information sharing across local teams. Ballot monitors ensured compliance with the Postal Service's Election Mail processes in every processing facility.

These and other efforts were not undertaken in response to litigation, but instead built upon longstanding and proven processes from previous election cycles. In response to the COVID-19 pandemic and its effect on demand for mail-in voting, and to reassure election officials and the voting public of the Postal Service's unwavering commitment, the Postal Service intensified its outreach, made additional resources available, and formalized the extraordinary measures that local management would be expected to be employed. Court orders in the months of September and October mostly aligned with the Postal Service's existing

plans to expedite the delivery of Election Mail as Election Day drew near, and in that sense did not require that our operational plans change in any material way. However, the litigation did impose a large administrative burden on the Postal Service—which included creating and producing new reports solely to satisfy the courts' information demands, certifying compliance with certain processes, and making postal officials available for testimony at frequent hearings, which at one point were occurring on a daily basis—during a critical time.

- *Ballots Not Measured in Service Performance*

The Postal Service strongly encourages the use of unique Intelligent Mail barcodes (IMbs) to track Election Mail volume, including ballots, and has made this recommendation for years. The Postal Service has created unique Service Type Identifiers (STIDs) for ballots and has educated election officials on both IMbs and STIDs. The Postal Service cannot track an individual ballot unless the mailpiece has a unique IMb and flows through regular mail processing (to receive the necessary scans). During 2020, the Postal Service conducted over 16,000 meetings with election officials (which were one part of over 50,000 total touchpoints including letters, mailing kits, meetings, etc.), often discussing these topics in depth. Although the Postal Service has strongly and repeatedly recommended that election officials adopt these technologies, adoption is not currently mandatory. The decision to adopt tracking technologies offered by the Postal Service is at the discretion of state and local election officials, although Chairwoman Maloney of the House Committee on Oversight and Reform stated at a February 24 hearing that she may be introducing a bill in Congress to mandate the use of barcodes for mail-in ballots in federal elections.

As the audit notes, about 43.5 million ballots were sent to voters without unique IMbs. As noted above, the decision whether to include an IMb and whether that IMb will be unique is currently left entirely to election officials (subject to any applicable state-law requirements). While the Postal Service has repeatedly recommended including unique IMbs on Election Mail, particularly ballots, use of a unique barcode is also not currently required under postal regulations. Without unique barcodes, the Postal Service is unable to measure the effectiveness of service of those particular pieces. Additionally, some extraordinary measures undertaken by the Postal Service to accelerate the delivery of Election Mail may keep mailpieces out of service measurement, even when they have unique IMbs. For example, some extraordinary measures remove the mailpiece from our automated processing mailflows, which limits tracking and visibility. And ballots subject to a "local turnaround" (when local post offices collect ballots within their service area, postmark the ballots, and then deliver the ballots to boards of election in their service area directly) bypass automation equipment entirely, and thus do not receive any scans and are not measured.

- *Service Performance of Election and Political Mail, and Ballots Delivered After Election*

The Postal Service largely agrees with the service metrics as reported in the audit. During the 2020 Election Cycle the Postal Service repeatedly recommended that voters request a mail-in ballot as early as possible and continued to reiterate our longstanding recommendation that voters return their completed ballots before Election Day and no later than 7 days before their state's deadline. The Postal Service would like to highlight that ballots sent from voters to election officials were delivered in 1.6 days on average, and 99.89 percent of all ballots were delivered within the 7-day recommended window. Blank ballots being sent from election officials to voters were delivered in 2.1 days on average, and 99.56 percent were delivered within 7 days.

The Postal Service agrees with the data provided in the audit concerning the 28,172 ballots that were sent to voters within four days of the Election, and notes that this figure represents only those pieces that could be identified as ballots through the usage of IMbs and STIDs, which is a subset of the total Election Mail volume that entered during this time. Postal Service Political and Election Mail Coordinators observed around 600,000 pieces from election officials to voters in this window, but much of that volume was determined to be provisional ballots and/or notices to voters concerning their submitted ballots.

- *Pre-Election Site Observations and General Election Week Site Observations*

The Postal Service is appreciative of the OIG's efforts in conducting on-site audits throughout October and throughout the week of the election. The daily feedback from the audit team was acted on quickly by the appropriate management officials. When discrepancies occurred during the daily audits, the OIG was quick to correct its reporting mistakes or provide detailed information that helped management take the necessary corrective actions. However, the delayed volume data in the audit does not match the daily and/or weekly numbers provided by the OIG during the October audits. Discussions with the audit team leader revealed that sometimes data entry would not be completed by the OIG auditor by the time reports were generated and sent to Postal management. The Postal Service does agree with the audit that the identified pieces were expedited and likely delivered on or before Election Day, including the 760 Election Mail pieces identified from November 2 through November 4.

The Postal Service agrees with the findings on compliance with All Clear reporting by site. As with the delayed mail reporting discussed above, the OIG was very helpful. When discrepancies were found in the audits, the OIG was quick to correct its reporting issues or provide guidance as to why the audit indicated non-compliance. The Postal Service is also aware of instances where OIG completed its All Clear compliance reviews before the scheduled time for the All Clears and would report those facilities as noncompliant even though the All Clear was completed at the appropriate (later) time. Findings were followed up on immediately by the appropriate management official. The Postal Service tracks All Clear reporting daily and District Managers and/or Division Directors follow up on non-compliant sites to correct deficient actions.

The Postal Service acknowledges that some managers indicated they were not aware of certain policies, such as the postmarking policy. This is despite the fact that the Postal Service transmitted numerous communications regarding Election Mail processes throughout the organization on a regular basis, in the form of Stand-Up Talks, Processing Operations Management Orders, several memorandums, and webinars such as the Learn & Grow webinars. The Postal Service will take this feedback from managers into account as we move forward, given we seek to continually improve our communication of processes.

- *Actions Implemented from Prior Audit Recommendations*

The Postal Service implemented recommendations and lessons learned from the OIG's readiness audit conducted in August of 2020. The Postal Service is continuing with its investigation into the creation of a separate Election Mail product. Training and communications were created and issued to help field operations improve self-audits, Election Mail logs, and compliance to All Clear procedures. However, as noted, not all managers followed processes concerning All Clear reporting despite our repeated attempts to reiterate proper policy.

Recommendation 1

OIG recommends that the Chief Logistics and Processing Operations Officer, and Vice President Enterprise Analytics work with mailers of Election Mail to identify why full-service ballots from the 2020 general election were excluded from service performance measurement and develop an action plan with timelines to address each cause to increase the number of ballots in measurement.

Management Response

Management largely agrees with this recommendation. The Service Performance Measurement (SPM) system is designed to provide scores that are accurate, reliable and representative, which is ensured by extensive business rules. To be eligible for official measurement, mailpieces must have the necessary visibility that can be provided through Full-Service Intelligent Mail. Full-Service helps ensure mailpieces pass data quality checks, receive an accurate start the clock, and enable Postal equipment to capture barcode scan events that provide the necessary visibility for measurement. One of the key business rules for Full Service Intelligent Mail is unique Intelligent Mail barcodes (IMbs) on individual pieces.

Election officials are ultimately responsible for choosing whether they use Full-Service Intelligent Mail, subject to any applicable state law requirements. In some cases, election officials opt to not follow Postal business rules for Full-Service Intelligent Mail such as choosing not to use unique IMbs for ballots, which does not allow for individual mailpiece tracking. The Postal Service strongly encourages election officials to use Full-Service Intelligent Mail on all ballot envelopes, but we cannot currently require that they do so. Moreover, the Postal Service's ability to influence mail service providers is limited, given that mail service providers often—act at the direction of their clients—election officials. We will continue to educate mail service providers regarding our recommendations for Election Mail so they can assist their clients in making informed decisions guided by best practices. We will also continue working with election officials to provide resources regarding Full-Service Mail so that they can convey their desires clearly to their mail service providers.

For those election jurisdictions that choose to use Full-Service Mail, the Postal Service has already taken steps to ensure that this mail is included in the service performance measurement. Through collaboration between the Postal Service and the industry, MTAC Work Group 194 was established in April 2020 to address potential reasons that Full-Service mail may be excluded from the official service performance measurement. This workgroup meets on a biweekly basis to achieve three key objectives that enable increased mail in the measurement:

- Communicate to mailers when mailpieces are excluded from the measurement, and which conditions are the root cause;
- Communicate to mailers what conditions cause Postal Service service performance exclusions; and
- Partner with mailers to resolve the root cause for the exclusion.

The Postal Service has created a comprehensive resolution guide that can be used by postal and industry stakeholders to mitigate exclusions. The guide provides information on exclusion reasons, defects, root causes, and actions needed to remedy the issue. Additionally, we are collaborating with the industry to develop an external facing dashboard that will allow authorized users to see the volume of their mail that is being excluded from the measurement. The dashboard will provide insights such as exclusion reasons, acceptance facility, induction method, day of week, mail class, mail shape, along with a 13 week trend on measurement exclusions. The dashboard will enable mailers to analyze their specific jobs and further investigate their exclusion reasons. The resolution guide complements the dashboard to help industry work with the Postal Service to reduce exclusions from service performance measurement.

This approach will enable mailers who support Political and Election Mail to proactively ensure the mail they generate can be included in official service performance measurement.
Additionally, some Full-Service Election Mail, including ballots, may not have received processing scans to the extent that extraordinary measures were used to accelerate the delivery of such mail. Extraordinary measures depart from our regular established processes and often limit the extent to which service performance may be measured through mail processing and tracking. For instance, Election Mail within a delivery unit's service area is often subject to a "local turnaround," which bypasses automated processes and instead relies on manual processing and handling so that the mail could be delivered by the applicable state deadline. Because mail delivered using a local turnaround is not processed on our automated equipment, it would be excluded from service measurement.

The need to resort to such measures is a function of how close to a state-law deadline that Election Mail is entered into the system, and is therefore outside the Postal Service's control; the Postal Service has no authority over state election deadlines and cannot dictate when election officials or voters should enter Election Mail into the mailstream, although we did engage in a proactive education campaign to educate election officials and voters concerning the benefits of sending ballots to voters early, and of the voters returning their ballots at least seven days before their ballots were due back to election officials. Absent changes in state laws and mailer behavior, both of which are outside the Postal Service's control, extraordinary measures may be required in the future to ensure the delivery of Election Mail prior to a state's deadline for receipt of a ballot, which means that ballots may again be excluded from service

performance measurement in future elections. Therefore, reliance on extraordinary measures for timely delivery not only imposes significant costs on the Postal Service, but limits the Postal Service's ability to obtain tracking and performance data even with regard to full-service mailpieces.

<u>Target Implementation Date</u>

Ongoing and we will provide an update on our efforts in this regard by December 31, 2021.
<u>Responsible Official</u>

Stephen Dearing, Director Corporate Reporting

<u>Recommendation 2</u>

OIG recommends that the General Counsel continue to educate state and local election officials on mailing deadlines for request and receipt of ballots that accounts for the Postal Service's time to process, transport, and deliver mail.

<u>Management Response/Action Plan</u>

Management agrees with the intent of this recommendation. The Postal Service conducted extensive outreach with election officials during the 2020 election cycle. During 2020, the Postal Service conducted over 16,000 meetings with election officials, facilitating discussions about the Postal Service's processes, recommended mailpiece design, mailing timeframes, delivery standards, and what to expect when using the mail. The organization also had more than 50,000 total touchpoints with election officials including meetings, sent letters to election officials discussing our general timing recommendations and noting specific instances of potential incongruities between the state election laws and our delivery standards, mailed a postcard to every address in the country recommending that voters who choose to use the mail should plan ahead and act early, revised our public-facing Election Mail website to give clear mailing recommendations, and sent mailing kits to election officials emphasizing mailing timeframes. Because of our limited role in the electoral process, the Postal Service has been mindful not to advocate for any specific changes to state election laws or to contradict election officials regarding such laws. At most we use our understanding of state laws to help explain how the state law may interact with the existing mailing infrastructure; but in general our outreach efforts focus on the mailing process including mailpiece design, automation compatibility, and visibility tools. We will continue to provide resources and conduct enhanced outreach to ensure that election officials understand how the mail works, including delivery timeframes, and to ensure that election officials in turn are able to educate voters about what to expect if they choose to use the mail to participate in an election.

However, the Postal Service does not have the authority to issue mailing "deadlines" for requesting or returning a ballot, and also cannot impose mandates concerning the amount of time election officials have to process any such requests. The authority to set these operative deadlines and make these important policy decisions rests with state or federal legislatures. Neither the Postal Service nor election officials can change these deadlines. Occasionally, the Postal Service has provided guidance on mailing timelines and how the mail works to state legislatures and Congress when asked and will continue to do so. We will also more proactively offer our guidance and expertise in this regard in support of any efforts to reconcile election timelines and how the mail works.

<u>Target Implementation Date</u>

Ongoing, and we will provide an update on our efforts in this regard by December 31, 2021.

<u>Responsible Official</u>

Thomas J. Marshall, General Counsel and Executive Vice President

Recommendation 3

OIG recommends that the Chief Logistics and Processing Operations Officer and the Chief Retail and Delivery Officer issue clear guidance in writing and via stand-up talks ahead of the next election for daily all-clear certifications, and ensure Election Mail processes and policies are communicated quickly, clearly, and directly to all levels of management.

Management Response/Action Plan

Management agrees with this recommendation. Defined times and how to conduct the daily all-clear certifications will be communicated to all levels of management prior to future elections. In addition, management will continue to communicate quickly, clearly, and directly to all levels of leadership.

Target Implementation Date

4/2/2021

Responsible Official

███████ Executive Director Election Mail

Recommendation 4

OIG recommends that the Chief Retail and Delivery Officer create a way to capture the separate morning and evening daily all-clear certifications for delivery units to ensure units are completing both as required.

Management Response/Action Plan

Management partially agrees with this recommendation. The current process of morning and evening all-clears was introduced for the General Election in 2020. If this remains the process, the Postal Service agrees to develop a solution to separate the morning and evening reports. However, new methods or technology may be implemented that may not require an all-clear certification by delivery units.

Target Implementation Date

April 2, 2021

Responsible Official

Omar Coleman, Election Mail Command Center

Recommendation 5

OIG recommends that the Chief Logistics and Processing Operations Officer and the Chief Retail and Delivery Officer conduct a post-election review to identify lessons learned and use as a reference in future elections.

Management Response/Action Plan

Management agrees with this recommendation. The Postal Service conducted an After Action Review on January 12, 2021 and will apply lessons learned in future elections. A copy of the After Action Review can be provided to the OIG.

Target Implementation Date

Complete

Responsible Official

█████████ Executive Director Election Mail

E-SIGNED by Isaac.S Cronkhite
on 2021-02-25 18:49:38 CST

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Isaac S. Cronkhite
Chief Logistics and Processing Operations Officer & Executive Vice President

E-SIGNED by Thomas.J Marshall
on 2021-02-25 15:37:47 CST

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Thomas J. Marshall
General Counsel & Executive Vice President

E-SIGNED by Kristin.A Seaver
on 2021-02-25 18:37:02 CST

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Kristin A. Seaver
Chief Retail and Delivery Officer & Executive Vice President

E-SIGNED by Jeffrey.C Johnson
on 2021-02-25 18:54:26 CST

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Jeffrey C. Johnson
Vice President, Enterprise Analytics

cc: Manager, Corporate Audit Response Team
     FOIA

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