## AUDIT REPORT

# Mail Delivery and Customer Service Operations - Avent Ferry Station, Raleigh, NC 

 January 19, 2021

Report Number 21-009-R21


## FROM:

SUBJECT:

## Sean Balduff

Director, Delivery and Retail Response Team
Audit Report - Mail Delivery and Customer Service Operations - Avent Ferry Station, Raleigh, NC (Report Number 21-009-R21)

This report presents the results of our audit of the Mail Delivery and Customer Service Operations - Avent Ferry Station, Raleigh, NC.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Jennifer L. Schneider, Operational Manager, or me at 703-248-2100.

## Attachment

cc: Postmaster General<br>Vice President, Delivery Operations<br>Vice President, Area Retail \& Delivery Operations, Southern Area<br>Corporate Audit and Response Management

## Background

This report presents the results of our self-initiated audit of Mail Delivery and Customer Service Operations at the Avent Ferry Station in Raleigh, NC (Project Number 21-009). The Avent Ferry Station is in the Greensboro District of the Southern Area. This audit was designed to provide U.S. Postal Service management with timely information on potential scanning, mail delivery, and customer service operation risks at the Avent Ferry Station.

The delivery unit has 58 city routes and 17 rural routes delivered by 78 city carriers and 27 rural carriers. We chose the Avent Ferry Station based on the number of stop-theclock $^{1}$ (STC) scans occurring at the delivery unit.

## Objective, Scope, and Methodology

Our objective was to evaluate select mail delivery and customer service operations and determine whether internal controls were effective at the Avent Ferry Station in Raleigh, NC.

To accomplish our objective, we reviewed delivery metrics including the number of routes and carriers, mail arrival time, amount of reported delayed mail, package scanning, Distribution Up-Time, ${ }^{2}$ and carrier return to office time. During our site visit from November 17-19, 2020, we reviewed unit safety and security procedures, mail conditions, Voyager credit card and arrow lock key ${ }^{3}$ security procedures, and COVID-19 safety procedures. We analyzed the scan status of mailpieces at the carrier cases and in the "Notice Left" ${ }^{4}$ area and interviewed unit management and employees. ${ }^{5}$

We conducted this audit from November 2020 through January 2021, in accordance with generally accepted government auditing standards. 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 January 5, 2021 and included their comments where appropriate.

[^0]We relied on computer-generated data from the product tracking and reporting system. Although we did not test the validity of controls over this system, we assessed the accuracy of the data by reviewing existing information, comparing data from other sources, observing operations, and interviewing Postal Service officials knowledgeable about the data. Therefore, we determined that the data were sufficiently reliable for the purposes of this report.

## Finding \#1: Delayed Mail

We found delayed mail and packages for 27 city routes and four rural routes during our site visit in November 2020 (see Figures 1 and 2).

Figure 1. Delayed Mail From November 14, 2020


Source: Office of Inspector general (OIG) photos taken on November 17, 2020.

Figure 2. Examples of Delayed Mail from November 16, 2020


Source: OIG photos taken on November 17, 2020.
Using Postal Service conversion factors, we estimated there were 6,230 pieces of delayed mail at the unit on the morning of November 17, 2020 (see Table 1).

Table 1. Delayed Mail by Zip Codes Serviced by Avent Ferry Station

| Mail Type | 27603 | 27606 |  | 27607 |  | Total Number of <br> Pieces |
| :--- | ---: | ---: | ---: | ---: | :---: | :---: |
| Letters and Flats | 2,686 | 116 | 3,246 | 6,048 |  |  |
| Packages | 151 | 11 | 20 | 182 |  |  |
| Total | 2,837 | 127 | 3,266 | $\mathbf{6 , 2 3 0}$ |  |  |

[^1]The delayed mail occurred for the following reasons:

- Staffing Shortage: Management stated the station has the following vacancies:
- Seventeen full-time city carrier positions
- Two full-time clerk positions
- Two management positions (including the station manager).

District management stated they have experienced hiring challenges. Specifically, there have been delays in converting non-career employees to career employees and competition with companies hiring for similar positions. District management also stated there was a national hiring freeze for management positions. Additionally, management stated four of the five supervisors delivered mail every day due to the shortage of city carriers.

- Overburdened Routes: ${ }^{6}$ Management stated there were at least seven overburdened routes at the station. They stated they have requested special route inspections since November 2019 for the overburdened routes. However, district management stated that they canceled scheduled inspections to promote social distancing during the pandemic.
- Late Arriving Mail from Processing Centers: There were 53 instances of trucks dispatched late from the Raleigh Processing \& Distribution Center (P\&DC) to the Avent Ferry Station from July through September 2020. The trips ranged from 1 minute to over 5 hours late. Management stated that mail often arrives late to the station, sometimes after the carriers have left to deliver mail on their routes. During our site visit, we observed the 6:45 a.m. truck arrive at 9:45 a.m. with two containers of packages, including Priority Mail, and about 2,796 pieces of flat mail. As a result, carriers had to wait on parcels and other mail to be sorted to their routes.
- Prioritization of Package delivery by 8 p.m.: Management stated that they prioritized the delivery of packages by the $8 \mathrm{p} . \mathrm{m}$. goal ${ }^{7}$ over the delivery of other mail. Management stated that they instructed carriers to leave the regular course of their routes and deliver all packages by 8 p.m. The carriers were instructed to return to their routes to deliver the remaining mail after all packages were delivered. Management stated that some carriers did not finish delivering the remaining mail because of high package volume and time constraints.
- Multiple Broken Cluster Box Units (CBU): ${ }^{8}$ We identified three tubs of mail that were not delivered due to broken CBUs (see Figure 3). Management stated there were several broken CBUs maintained by the station that had not been repaired even after they had requested the repairs multiple times. Further, management

[^2]stated that when carriers cannot deliver the mail in the broken CBUs, customers were required to come to the station to retrieve their mail.

Figure 3. Example of Undelivered Mail for Broken CBU


Source: OIG photos taken on November 17, 2020.
In subsequent communications with the station manager, they stated that all broken CBUs had been repaired; therefore, we are not making a recommendation on this issue.

Postal Service policy ${ }^{9}$ states that all types of First-Class Mail, Priority Mail, and Priority Express Mail are always committed for delivery on the day of receipt. Any committed mail not processed and taken out for delivery on the day of receipt is delayed. In addition, policy ${ }^{10}$ states that managers must review all communications that may affect the day's workload and be sure that replacements are available for unscheduled absences. Further, they must develop contingency plans for situations that may interfere with normal delivery service. When mail is delayed, there is an increased risk of customer dissatisfaction, which may adversely affect the Postal Service brand.

[^3]> Recommendation \#1: We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to develop an action plan to fill vacancies at the Avent Ferry Station and assign additional carriers as necessary to the station until vacancies can be filled.

Recommendation \#2: We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to conduct all requested route inspections at the Avent Ferry Station as soon as practical.

Recommendation \#3: We recommend the Manager, Greensboro District, coordinate with the Manager, Raleigh Processing \& Distribution Center, to ensure mail arrives at the Avent Ferry Station according to the agreed schedule.

## Finding \#2: Reporting of Delayed Mail

Management did not ensure that all delayed mail was accurately reported in the Customer Services Daily Reporting System (CSDRS). ${ }^{11}$ We determined 375 pieces of delayed mail were reported in CSDRS on November 16, 2020, the day prior to our visit. However, during our observations on the morning of November 17, 2020, we identified about 6,200 delayed mailpieces.

Station management stated the station had a shortage of management employees and did not prioritize reporting delayed mail when carriers returned to the unit in the evening. Managers are required ${ }^{12}$ to report all mail in CSDRS that remains in a reporting unit after the carriers have left the office to begin their street duties. Inaccurate reporting of delayed mail in CSDRS provides management at the local, district, area, and headquarters levels with an inaccurate status of mail delays and can result in improper actions taken to address issues.

> Recommendation \#4: We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to direct the station manager at the Avent Ferry Station to prioritize reporting delayed mail in the Customer Service Daily Reporting System.

## Finding \#3: Package Delivery Scanning

Delivery unit employees improperly scanned packages at the station rather than at the delivery point. We analyzed scans performed between May and September 2020 and

[^4]found that 41,548 packages received an STC scan at the station (see Table 2). The majority of these packages were scanned "Delivered" (see Table 3).

Table 2. STCs at Delivery Unit from May through September 2020

| May | June | July | August | September | Total |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 15,424 | 14,906 | 5,242 | 2,471 | 3,505 | $\mathbf{4 1 , 5 4 8}$ |

Source: OIG analysis of Postal Service PTR system data.
Table 3. STC Scan Types at the Delivery Unit

| STC Scan Type | Scan <br> Count | Percentage of <br> Scans |
| :--- | ---: | ---: |
| Delivered | 41,367 | 99.56 |
| Receptacle Full/ltem Oversized | 89 | 0.21 |
| No Secure Location Available | 50 | 0.12 |
| No Authorized Recipient Available | 38 | 0.09 |
| Refused | 4 | 0.01 |
| Totals ${ }^{13}$ | $\mathbf{4 1 , 5 4 8}$ | $\mathbf{1 0 0}$ |

Source: OIG analysis of Postal Service PTR system data.
We further identified 4,899 packages (about 12 percent) scanned at the delivery unit that had invalid route or employee information. The route or name input into the scanner during set up by the employees was either for non-existent routes or omitted. Management was unable to determine accountability for improper scans when the scanner was set up incorrectly.

We also conducted on-site observations at the unit on the morning of November 17, 2020, before carriers arrived for the day. During our observations, we judgmentally selected 98 packages ( 65 were in the carrier cases and 33 were in the "Notice Left" area) for review of scanning and tracking data. Of the 98 packages reviewed, 56 of the 65 packages at the carrier cases and nine of the 33 packages in the "Notice Left" area were missing an STC scan, had improper scans, or were scanned at a location other than the destination. Specifically:

- Thirty-six packages (34 at the carrier cases and two in the "Notice Left" area) had a "Delivered" scan. A "Delivered" scan should only be made when a package is successfully left at the delivery address, in a P.O. Box, or in a parcel locker.
- Fourteen packages (13 at the carrier cases and one in the "Notice Left" area) were scanned "No Access", "No Secure Location Available", or "Delivery Exception, Animal Interference" at locations other than the delivery points. These scans were made from about half a mile to 11 miles away from the delivery point.

[^5]- Eleven packages (seven at the carrier cases and four in the "Notice Left" area) did not have an STC scan letting the customer know the reason for non-delivery.
- Two packages in the carrier cases should have been returned to the sender - one had an "Insufficient Address" scan, and one had a "No Such Number" scan.
- Two packages in the "Notice Left" area had no scans to alert the customer that the package had arrived at the unit or any delivery status of the package.

In addition, 11 of the 33 mailpieces in the "Notice Left" area should have been returned to the sender. ${ }^{14}$ These mailpieces ranged from three to 46 days past their return dates.

These issues occurred because district and local management did not adequately monitor and enforce package scanning and handling procedures. The station manager stated they had only been in the position for two months and did not realize that there were any improper scanning and handling issues at the station. Further, the station had a shortage of management employees to oversee scanning procedures. In addition, two carriers with a high number of STCs at the unit (about 18 percent combined) stated the previous station manager instructed them to scan mail being held for customers as "Delivered". They stated they continued this practice even though the manager had been gone for over a year.

The Postal Service's goal is to ensure proper delivery attempts for mailpieces to the correct address with proper service, ${ }^{15}$ which includes accurate scanning of mailpieces at the point of delivery, ${ }^{16}$ thus ensuring 100 percent visibility throughout the process. ${ }^{17}$

Customers rely on accurate scan data to track their packages in real time. When employees do not scan mailpieces correctly, customers are unable to determine the actual status of their packages. By improving scanning operations, management can potentially improve mail visibility, increase customer satisfaction, and enhance the customer experience and the Postal Service brand.

> Recommendation \#5: We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to ensure that employees follow standard operating procedures for scanning, periodically review and monitor scan data for compliance, and provide personnel with refresher training on package scanning and handling procedures.

[^6]
## Finding \#4: Safeguarding of Assets

Avent Ferry Station management did not properly manage and safeguard Postal Service assets including arrow lock keys and mail delivery vehicles.

## Arrow Lock Keys

We found the arrow lock key inventory log was not accurate. We reviewed the unit's inventory log for arrow lock keys and conducted a physical inventory of the arrow lock keys at the unit and found sixteen of the 68 arrow lock keys on the inventory log were missing.

The station manager stated that this condition occurred because previous management did not update the inventory log. The station manager was in the process of updating the log prior to our site visit. Postal Service policy ${ }^{18}$ states that every office must maintain an up-to-date list of all arrow lock keys and follow proper procedures when dealing with broken and missing keys. When there is insufficient oversight and supervision of accountable items such as arrow lock keys, there is an increased risk of mail theft.

In subsequent communications, management provided a completed arrow lock key inventory log indicating all applicable routes were assigned one arrow lock key; therefore, no recommendation will be made for this issue.

## Delivery Vehicles

We inspected delivery vehicles on the morning of November 17, 2020 and found that 24 of the 76 unattended vehicles ( 32 percent) were not secured.

This condition occurred due to insufficient management oversight. Specifically, unit management did not ensure carriers were securing and locking their vehicles at the end of the day and were not following the PM Unit Review which includes verifying that vehicles are locked and secured. Station management prioritized completing mail delivery over verifying if vehicles were secured. When vehicles are left unlocked, there is an increased risk that they could be vandalized or stolen.

> Recommendation \#6: We recommend the Manager, Greensboro District, instruct Avent Ferry Station Management to follow procedures to ensure delivery vehicles are locked at the end of each day.

## Finding \#5: COVID-19 Safety and Cleaning Procedures

During our site visits, we observed multiple employees not wearing masks while working in the station. Further, employees stated the station had gone weeks without general cleaning supplies such as hand soap and paper towels in the restrooms. In addition, regular cleaning was not being done at the station.

[^7]According to Postal Service policy, ${ }^{19}$ all employees, including those who do not deal directly with the public, are required to wear face coverings in the workplace when employees cannot achieve or maintain social distancing of at least six feet. ${ }^{20}$

The CDC recommends cleaning frequently touched surfaces and commonly shared items at least daily using routine cleaning agents (e.g., detergents, spray cleaners, and sanitizers). Priority should be given to surfaces in locations where there is the most human traffic. Postal Service policy ${ }^{21}$ states that if custodial resources are not available for these tasks at facilities where the cleaning services are performed by career maintenance bargaining unit employees, including those facilities covered by relief from another office, the senior postal official may require non-custodial personnel to perform them.

This occurred because management did not enforce COVID-19 safety policies and Centers for Disease Control and Prevention guidelines. Management stated that some employees were reluctant to wear masks. In addition, management stated they did not have a full-time custodian to perform consistent COVID-19 cleaning at the unit. Management stated that a maintenance employee worked at the unit part time.

During our observations, management held a stand-up talk with all employees and instructed them it was mandatory to wear masks in the building, when interacting with customers, and when social distancing is not possible.

> Recommendation \#7: We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to ensure COVID-19 related protocols, including wearing face coverings, providing cleaning supplies, and daily facility cleaning occurs at the Avent Ferry Station.

## Management's Comments

Management agreed with all findings and recommendations in the report. See Appendix A for management's comments in their entirety.

Regarding recommendation 1, district management stated they sent instructions to the Officer in Charge ${ }^{22}$ to begin hiring immediately. In addition, district management provided us with their hiring action plan and, in subsequent communications, provided documentation showing they added more carriers to Avent Ferry Station. Management completed these actions as of January 13, 2021.

Regarding recommendation 2, district management stated they will conduct official inspections on the requested routes once COVID-19 restrictions have been lifted. In

[^8]subsequent communications, management stated the target implementation date is September 30, 2022. However, they stated the district will do everything they can to work with the union to get the inspections done sooner.

Regarding recommendation 3, district management stated they have implemented ongoing daily teleconferences that include plant management to discuss late trips. Management provided evidence of coordination between Greensboro District management and Raleigh Processing and Distribution Center management. Management completed this action as of January 12, 2021.

Regarding recommendation 4, district management stated they instructed the Officer in Charge to direct the station manager to accurately report delayed mail. Management provided the official letter sent to the Officer in Charge. Management completed this action as of January 12, 2021.

Regarding recommendation 5, district management stated they will provide training for all Executive and Administrative Schedule employees in the city of Raleigh. Management's target implementation date is January 31, 2021.

Regarding recommendation 6, district management stated they created a daily tracking sheet to validate that all vehicles are locked and are requiring management to sign off on the tracking sheet daily. Management provided us with copies of the tracking sheet. Management completed this action as of January 12, 2021.

Regarding recommendation 7, district management stated they sent an official letter to the Officer in Charge directing them to follow all protocols on a daily basis and provided us with a copy of the letter. Management completed this action as of January 12, 2021.

## Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations in the report.

We consider recommendations $1,3,4,6$, and 7 closed with the issuance of this report.

Recommendations 2 and 5 require OIG concurrence before closure. The OIG requests written confirmation when corrective actions are completed. Recommendations 2 and 5 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.

# Appendix A. Management's Comments 

JOSEPH E. WOLSKI
DIRECTOR, AUDIT OPERATIONS
SUBJECT: Response to Draft Audit Report - Mail Delivery and Customer Service
Operations - Avent Ferry Station, Raleigh, NC
(Project Number 21-009-DRAFT)

Thank you for the opportunity to respond to the Office of Inspector General (OIG) draft audit report, "Mail Delivery and Customer Service Operations- Avent Ferry Station, Raleigh, NC".

Management agrees with the findings noted in the audit report.
Management does agree with the recommendations as outlined in the audit per the responses below.

## Recommendation \#1

We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to develop an action plan to fill vacancies at the Avent Ferry Station and assign additional carriers as necessary to the station until vacancies can be filled.

## Management Response/Action Plan

Management agrees with this recommendation and has implemented by sending instruction to the Officer in Charge to begin hiring immediately. The Officer in Charge has requested and received the hiring action plan. The official letters with the action plan will be provided to request closure of this recommendation.

## Target Implementation Date

January 31, 2021

## Responsible Official

Postmaster/ Officer in Charge

## Recommendation \#2

We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to conduct all requested route inspections at the Avent Ferry Station as soon as practical.

## Management Response/Action Plan

Management agrees with this recommendation and will implement by conducting official inspections on routes that have filed a request to have a route count per Handbook M39, Management of Delivery Services, section 271-G. The NALC's position is that the routes are overburdened. These counts will commence once restrictions in place due to the COVID-19 pandemic have been lifted.

## Target Implementation Date

To Be Determined- Pandemic Impact

## Responsible Official

Manager, Operations Programs Support

## Recommendation \#3

We recommend the Manager, Greensboro District, coordinate with the Manager, Raleigh Processing \& Distribution Center, to ensure mail arrives at the Avent Ferry Station according to the agreed schedule.

## Management Response/Action Plan

Management agrees with this recommendation and has implemented by having ongoing daily teleconferences that includes plant management to discuss late trips. In addition, the Area Vice President has requested and received information on plant clearance times from the Director of Plant Operations overseeing Raleigh P\&DC. To request closure, several email examples regarding late trip communications related to these meetings will be provided.

Target Implementation Date
January 12, 2021

## Responsible Official

Director, Plant Operations
-3-

## Recommendation \#4

We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to direct the station manager at the Avent Ferry Station to prioritize reporting delayed mail in the Customer Service Daily Reporting System.

## Management Response/Action Plan

Management agrees with this recommendation and has implemented by sending an official letter to the Officer in Charge with instructions to direct the station manager to accurately report delayed mail. A copy of the official letter will be provided to request closure.

## Target Implementation Date

January 12, 2021

## Responsible Official

Postmaster/ Officer in Charge

## Recommendation \#5

We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to ensure that employees follow standard operating procedures for scanning, periodically review and monitor scan data for compliance, and provide personnel with refresher training on package scanning and handling procedures.

## Management Response/Action Plan

Management agrees with this recommendation and will provide refresher training for all EAS employees in the city of Raleigh. Copies of the training materials and roster of attendees will be provided to request closure.

## Target Implementation Date

January 31, 2021

## Responsible Official

Manager, Post Office Operations

## Recommendation \#6

We recommend the Manager, Greensboro District, instruct Avent Ferry Station Management to follow procedures to ensure delivery vehicles are locked at the end of each day.

## Management Response/Action Plan

Management agrees with this recommendation and has implemented by creating a tracking sheet listing all vehicles at each facility in Raleigh to be used daily to validate that all vehicles were locked. Management must verify and sign off on a daily basis. Sample copies of the tracking sheets will be provided to request closure.

## Target Implementation Date

January 12, 2021
Responsible Official
Postmaster/ Officer in Charge
Recommendation \#7
We recommend the Manager, Greensboro District, instruct the Postmaster, Raleigh, to ensure COVID-19 related protocols, including wearing face coverings, providing cleaning supplies, and daily facility cleaning occurs at the Avent Ferry Station.

## Management Response/Action Plan

Management agrees with this recommendation and has implemented by sending an official letter to the Officer in Charge directing that all protocols are to be followed on a daily basis. A copy of the letter will be provided to request closure of this recommendation.

Target Implementation Date January 12, 2021

Responsible Official
Postmaster/ Officer in Charge


Russell Gardner
Greensboro District Manager
cc: Manager, Corporate Audit \& Response Management


[^0]:    ${ }^{1}$ A scan event that indicates the Postal Service has completed its commitment to deliver or attempt to deliver the mail piece. Examples of STC scans include "Delivered", "Available for Pick-up", "No Access", and "Business Closed".
    ${ }^{2}$ Time of day that clerks have completed distributing mail to the carrier routes after it has arrived from the processing center.
    ${ }^{3}$ A distinctively shaped key carriers use to open mail-receiving receptacles such as street collection boxes and panels of apartment house mailboxes equipped with an arrow lock. Arrow lock keys are accountable property and subject to strict controls.
    ${ }^{4}$ The area of a postal facility where letters or packages that the carriers were unable to deliver are stored for customer pickup.
    ${ }^{5}$ The employees we interviewed had from 1 to 32 years of service.

[^1]:    Source: OIG analysis is based on Postal Service conversion factors in Handbook M-32, Management Operating Data Systems (MODS), Appendix D.

[^2]:    ${ }^{6}$ An overburdened route is one that consistently has over 30 minutes of overtime or auxiliary assistance.
    ${ }^{7}$ Standard Work: Scanning.
    ${ }^{8}$ Centralized unit of individually locked compartments for the delivery and collection of mail.

[^3]:    ${ }^{9}$ Delivery Unit Service Talk-Committed Mail \& Color Code Policy for Marketing Mail, February 2019.
    ${ }^{10}$ Handbook M-39, Management of Delivery Services, TL-14, Section 111.2, June 2019.

[^4]:    ${ }^{11}$ A delivery unit-based system that provides a snapshot of the daily condition of the mail at the point in time when the carriers have departed for the street and provides a formal delayed mail reporting tool.
    ${ }^{12}$ Customer Service Daily Reporting System, Guidelines and Definitions, September 2016.

[^5]:    ${ }^{13}$ Total values may be off due to rounding.

[^6]:    ${ }^{14}$ July 2007 Notice Left and Return Guidelines state that parcels should be returned on the $15^{\text {th }}$ calendar day and international mail should be returned on the 30th calendar day.
    ${ }^{15}$ Delivering a Positive Customer Experience - Delivery Done Right stand-up talk.
    ${ }^{16}$ Where Is My Package (WIMP) and Scanning, February 2019.
    ${ }^{17}$ Scanning at a Glance - Delivering 100 percent Visibility, August 2011.

[^7]:    ${ }^{18}$ USPS Arrow Key Standard Work, April 2020.

[^8]:    ${ }^{19}$ COVID-19 Stand-UpTalk 54 - ALL EMPLOYEES: Protecting everyone's safety and wellness, November 13, 2020.
    ${ }^{20}$ The State of North Carolina Executive Order 147, June 24, 2020, states that face coverings are required in certain high-density occupational settings where social distancing is difficult.
    ${ }^{21}$ Maintenance Management Order, MMO-031-20, February 3, 2020.
    ${ }^{22}$ A temporary assignment of an employee to act as postmaster during which the accountability of postmaster is transferred to the employee.

