



Office of Inspector General | United States Postal Service

## Audit Report

# Payments to Contract Cleaners

Report Number 21-096-R22 | November 12, 2021



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# Highlights

## Objective

Our objective was to determine whether U.S. Postal Service payments to contract cleaners were valid, timely, and made in compliance with Postal Service payment policy.

The Postal Service contracts with external service providers to clean eligible postal facilities. The two methods for procuring cleaning services are dependent on the value of the estimated cleaning service. Specifically:

- Local cleaning service agreements are procured and awarded by a postmaster or officer-in-charge of the postal facility if the annual cleaning service is less than:
  - \$10,000 and the cleaning is performed by a self-employed cleaner, or
  - \$2,500 and a service company performs the cleaning.
- When the annual cleaning service is above those annual dollar amounts, Postal Service Category Management Center (CMC) contracting personnel procure and award a contract for the cleaning services.

During fiscal years (FY) 2019 and 2020, about 4,200 postal facilities, out of a total of about 34,600 postal facilities had contract cleaners. The Postal Service paid contract cleaners \$99.5 million during that time period. We reviewed 205 payments to self-employed cleaners and 6 payments to CMC contactors.

## Findings

Payments to contract cleaners were not always valid, timely, or in compliance with payment policy. Regarding local cleaning service agreements, the Postal Service did not always comply with payment policy for local cleaners. Our sampled transactions showed:

- 98 instances where postmasters did not complete or retain required documentation for establishing and managing local cleaning agreements.
- Eight instances where the self-employed cleaner who signed the agreement did not perform the cleaning services, as required by policy.

- Seven instances where postmasters or officers in charge did not submit required documentation to suspend or renew payments timely, including:
  - Two instances where cleaners who did not report to the postal facility to clean for two and five days, respectively, during a two-week period but the postmasters or officers in charge did not submit a request to reduce the payments for the missed days, and
  - One instance where a cleaner stopped reporting to a facility, but the postmaster did not submit the required documentation to stop automatic payments timely, and
  - Four instances where postmasters did not complete the renewal documentation timely, so payments to the self-employed cleaners stopped even though they continued to work.
- A postmaster established a local cleaning agreement with a self-employed cleaner who shares a residence and checking account with the postmaster.

In addition, postmasters at three postal facilities did not follow Postal Service policy when they granted contract cleaners access to the workroom floors to clean when Postal Service personnel were not on duty.

These issues occurred because postmasters were either unaware of policy requirements or relied on procedures set up by previous postmasters that were not consistent with policy requirements. In addition, local cleaners were not used at all postal facilities and postmasters did not often establish and renew local cleaning agreements. Further, Purchasing Shared Services Center personnel support post office operations and provide guidance on policy, but policy did not have implementing guidelines needed to address specific field situations.

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***“The Postal Service contracts with external service providers to clean eligible postal facilities.”***

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Because the Postal Service did not always comply with policies for local cleaners, we consider \$23,428 unsupported questioned costs.

Regarding CMC contracted cleaning services, Contracting Officer Representatives (COR) responsible for approving cleaner invoices did not always validate that the work was performed before approving them for payment. CORs rely on postmaster-provided missed service days reports to validate the supplier invoice information. However, postmasters do not always notify CORs of missed service days, which increases the risk of paying cleaners for work they did not perform. We did not identify policies or procedures that outline specific COR or postmaster responsibilities for overseeing CMC cleaning contracts.

As a result, the Postal Service cannot ensure that persons other than those who signed local agreements completed required safety training. If issues arise with the cleaner, maintaining required documentation supports a postmaster's decision to terminate agreements. Also, when contractors access the workroom without Postal Service employee oversight, there is an increased risk that mail is not safeguarded.

## Recommendation

We recommend management:

- Update and clarify local cleaning policies to include implementing guidelines for specific field situations; and communicate the updated policies and guidelines to postmasters at least annually, given the movement of personnel within the postmaster category.
- Direct postmasters to review and comply with policy requirements on access codes and keyed locks.
- Update and communicate policies and procedures for processing and paying contract cleaner invoices, to include validating the performance of contractor custodial services under CMC issued orders and procedures for postmasters or officers-in-charge to report missed service days.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

November 12, 2021

**MEMORANDUM FOR:** CARA GREENE  
VICE PRESIDENT CONTROLLER

MARK A. GUILFOIL  
VICE PRESIDENT, SUPPLY MANAGEMENT

ELVIN MERCADO  
VICE PRESIDENT, RETAIL & POST OFFICE OPERATIONS

*Lorie Nelson*

**FROM:** Lorie Nelson  
Acting Deputy Assistant Inspector General  
for Finance and Pricing

**SUBJECT:** Audit Report – Payments to Contract Cleaners  
(Report Number 21-096-R22)

This report presents the results of our audit of U.S. Postal Service payments to contract cleaners.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Luisa Gierbolini, Acting Director, Finance, or me at 703-248-2100.

Attachment

cc: Postmaster General  
Corporate Audit Response Management

# Results

## Introduction/Objective

This report presents the results of our self-initiated audit of U.S. Postal Service payments to contract cleaners (Project Number 21-096). Our objective was to determine whether Postal Service payments to contract cleaners were valid, timely, and made in compliance with Postal Service payment policy. See [Appendix A](#) for additional information about this audit.

## Background

The Postal Service contracts with external service providers to clean eligible<sup>1</sup> postal facilities. The two methods for procuring cleaning services are dependent on the value of the estimated cleaning service. Specifically:

- Local cleaning service agreements are procured and awarded by a postmaster or officer-in-charge (OIC) of the postal facility and can be used if the annual cleaning service is less than:
  - \$10,000 and the cleaning is performed by a self-employed cleaner, or
  - \$2,500 and a service company performs the cleaning.
- When the annual cleaning service is above those annual dollar amounts, a Postal Service Facility Services Category Management Center (CMC)<sup>2</sup> contract is required. Contracting personnel procure and award a contract for the cleaning services.

During fiscal years (FY) 2019 and 2020, about 4,200 postal facilities, out of a total of about 34,600 postal facilities, had contract cleaners. The Postal Service paid contract cleaners \$99.5 million during that time period.

## Finding #1: Local Cleaning Services

We analyzed Enterprise Data Warehouse (EDW)<sup>3</sup> payment data for FYs 2019 and 2020 and determined the Postal Service did not always comply with payment policy for local cleaning service agreements. Specifically:

- 1 Eligibility to use contracted cleaners instead of postal employees is limited by Postal Service internal policies and agreements with labor unions.
- 2 The Facility Services' CMC is responsible for maintenance service contracts associated with keeping sites clean, comfortable and in good condition.
- 3 The Postal Service repository for all data and the central source for information on retail, financial, and operational performance.
- 4 The Postal Service established the PSSC to provide purchasing guidance, answer supplying policy and process questions, and improve oversight.

- Postmasters did not always complete or retain required documentation for establishing and managing local cleaning service agreements.
- The self-employed cleaner that signed the agreement was not always the one to perform the cleaning services.
- The Postal Service paid cleaners for days in which the cleaner did not report to the postal facility to clean. Also, automatic payments to existing cleaners stopped when postmasters did not initiate the agreement renewal process timely.
- A postmaster established a local cleaning agreement with a self-employed cleaner who shares a residence and checking account with the postmaster.

These issues occurred because postmasters were unaware of policy requirements and relied on procedures set up by previous postmasters that were not consistent with policy requirements. Local cleaners were not used at all postal facilities and postmasters did not often establish and renew local cleaning agreements. Further, Purchasing Shared Services Center (PSSC)<sup>4</sup> personnel support post office operations and provide general guidance on policy, but policy did not have implementing guidelines needed to address field situations.

When postmasters are unaware of and do not follow correct procedures, the risk of incorrect payments, including paying local cleaners who did not perform the contracted work, increases. Additionally, the Postal Service cannot ensure that persons other than those who signed the local cleaning agreement completed

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***“When postmasters are unaware of and do not follow correct procedures, the risk of incorrect payments, including paying local cleaners who did not perform the contracted work, increases.”***

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required Occupational Safety and Health Administration (OSHA) training.<sup>5</sup> Finally, if issues arise with the cleaner, maintaining required documentation supports a postmaster’s decision to terminate agreements.

### Local Cleaning Service Agreement Documentation

We reviewed 205 payments to local cleaners and determined postmasters did not always complete or retain required documentation for establishing and managing local cleaning service agreements. Table 1 shows the documentation requirements and the number of instances the required documents were not completed or retained.

**Table 1. Documentation Requirements Not Completed or Retained**

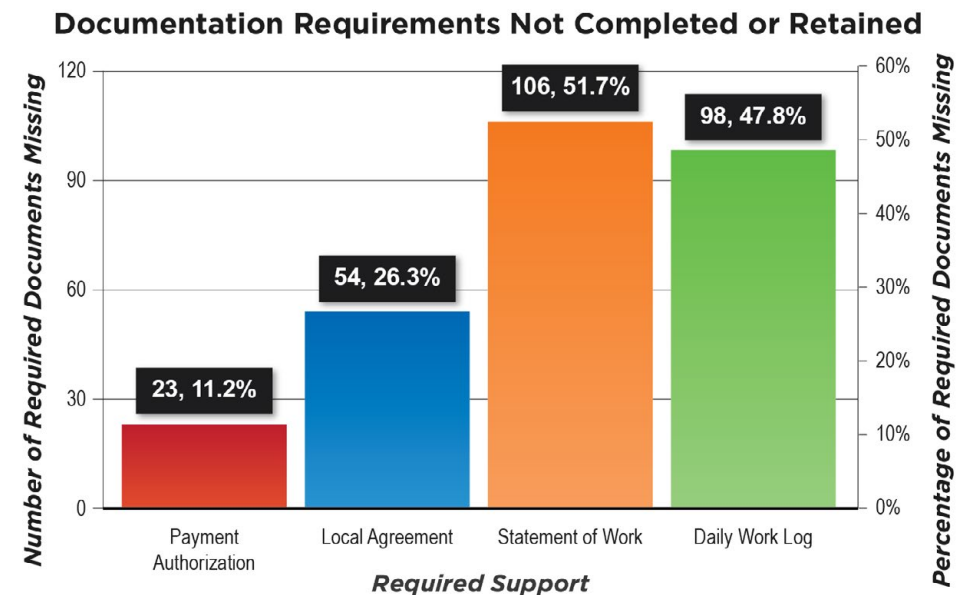
Required Support	Required Documents Missing	Percentage
Payment Authorization	23	11.2%
Local Agreement	54	26.3%
Statement of Work	106	51.7%
Daily Work Log	98	47.8%

Source: United States Postal Service Office of Inspector General (OIG) analysis of sampled transactions.

For local cleaning service agreements, the postmaster or OIC completes and signs Postal Service (PS) Form 7355, Cleaning Agreement, and PS Form 7227, Local Cleaning Services Payment Authorization. Both forms are sent<sup>6</sup> to the Contractual Payables Branch of the San Mateo Accounting Service Center (ASC)<sup>7</sup>

for payment processing. Cleaning Service Local Buying Agreement Guidelines (Guidelines)<sup>8</sup> state the local postal facility is responsible for maintaining all local agreement documentation and forms, including the statement of work (SOW), for two years after the agreement expires.<sup>9</sup> They also require each applicable facility to track a cleaner’s work time and monitor their performance. They specifically state that the facility will have the cleaner initial the Local Cleaning Services Daily Work Log and maintain the log. The guidelines include a sample Daily Work Log.

We consider \$22,326 for the 98 items in our sample, where personnel did not complete or retain the required Local Cleaning Service Daily Work Log, as unsupported questioned costs.<sup>10</sup>



5 OSHA requires the Postal Service to provide Hazard Communication (HAZCOM) training at all sites and asbestos awareness training at facilities where asbestos is present.

6 PS Forms 7227 were previously mailed to the San Mateo ASC, but starting in FY 2021, the form is uploaded to the Postal Service’s Enterprise Imaging & Workflow (eIWS) OnLine Forms application.

7 Effective August 14, 2021, the San Mateo ASC has been renamed the St. Louis ASC Satellite Office. The St. Louis ASC Satellite Office will continue performing the same functions as before for local cleaning agreements and CMC cleaning contracts.

8 These Guidelines were effective August 1, 2014.

9 An SOW states the requirements of the Postal Service’s objectives and enables potential suppliers to plan for contract performance.

10 Costs that are called into question because of missing or incomplete documentation, or because of failure to follow required procedures.

## Performance of Local Cleaning Services

We reviewed payments made to self-employed cleaners for 200 postal facilities<sup>11</sup> and found eight instances where the self-employed cleaner did not perform the cleaning as required. Rather, another individual, sometimes a family member of the one that signed the cleaning agreement, performed the cleaning. The self-employed cleaner that signed the local cleaning service agreement was not always the cleaner on site.

In one instance, the self-employed cleaner was paid about \$36,000 to clean five post offices; however, a family member performed all of the cleaning. At three of the eight postal facilities where this issue occurred, prior postmasters allowed family members to clean and the practice continued after we brought it to management's attention. One postmaster stated that after reviewing the policy with management,<sup>12</sup> they still felt it was appropriate to allow the self-employed cleaner's family member to continue to clean. Postal Service policy requires that for cleaning services procured from self-employed individuals and valued at less than \$10,000 per postal facility, the self-employed cleaner must perform the cleaning service.

We consider \$675 for the three<sup>13</sup> items in our sample where the individual that signed the Local Cleaning Service Daily Work Log was not the self-employed cleaner who signed the local agreement as unsupported questioned costs.

## Payments to Contract Cleaners

The Postal Service paid cleaners for days when the cleaner did not report to the postal facility to clean. Also, automatic payments to cleaners stopped when postmasters did not initiate the agreement renewal process timely. We found:

- Two instances where the Daily Work Log showed that the self-employed cleaners did not report to the postal facility on the days listed on the SOW but the postmasters or OICs did not submit a modification request to reduce the payment for the missed service days. The cleaners did not report to work for

two and five days respectively during a two-week period, for a total of \$267 in overpayments.

- One instance where a self-employed cleaner stopped reporting to a postal facility, but the postmaster did not submit the required documentation to the San Mateo ASC to stop the automatic payments. As a result, the San Mateo ASC processed three biweekly payments, totaling each totaling \$160.<sup>14</sup>
- Four instances where postmasters did not complete the renewal documentation timely so payments to the self-employed cleaners stopped, even though they continued to work.

The San Mateo ASC establishes automatic, recurring payments for local cleaning agreements within the Postal Service's Accounts Payable system for either one or two years, depending on agreement terms. If work is not being performed in accordance with agreement terms, the postmaster or OIC must submit PS Form 7228, Local Cleaning Services Agreement Modification, to the San Mateo ASC to stop or modify automatic payments or terminate the cleaning agreement. Guidelines also state the San Mateo ASC must receive the renewal Local Agreement and the Payment Authorization forms at least 15 working days prior to the expiration of an existing agreement.

We consider \$427 for the three items in our sample where the cleaners did not report to the postal facility as unsupported questioned costs.

## Contracted Cleaner Residence

A postmaster established a local cleaning agreement with a self-employed cleaner who shared a residence and checking account with the postmaster. The

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***“We consider \$427 for the three items in our sample where the cleaners did not report to the postal facility as unsupported questioned costs.”***

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<sup>11</sup> The sample included 205 payments for cleaning services at 200 postal facilities.

<sup>12</sup> The OIG provided postmasters with the Guidelines.

<sup>13</sup> We excluded 5 items that were already included in the 98 items questioned due to lack of cleaning logs.

<sup>14</sup> The Postal Service stopped two of the three payments prior to issuance.



Postal Service paid this cleaner \$3,120 during our scope period. The Guidelines and the Administrative Support Manual (ASM)<sup>15</sup> states local buys may not be made from an individual residing in the same household as a Postal Service employee. In February 2021, the Postal Service did not renew the local agreement with the self-employed cleaner. We referred this issue to our Office of Investigations for further review.

**Recommendation #1**

We recommend the **Vice President Supply Management** and the **Vice President Retail and Post Office Operations**, update and clarify local cleaning polices to include implementing guidelines for specific field situations; and communicate the updated policies and guidelines to postmasters at least annually, given the movement of personnel within the postmaster category.

**Finding #2: Access to Postal Service Property**

Postmasters sometimes permitted contract cleaners to access workroom floors and to clean when Postal Service personnel were not on duty. We identified three postal facilities where the postmaster gave the self-employed cleaner either a key or an access code to enter the workroom. At one of the three facilities, the

*“When contractors access the workroom without Postal Service employee oversight, there is an increased risk that mail is not safeguarded.”*

key also allowed access to the postmaster’s office. Further, 2 of the 3 self-employed cleaners performed their services when Postal Service employees were not on duty. The ASM<sup>16</sup> states that if keys [access codes] are furnished to contractors, they must not permit access to workroom areas. Additionally, the Guidelines state postmasters must not schedule cleaning services when Postal Service employees are not on

duty. Table 2 shows the areas of the postal facility that the self-employed cleaners could access.

**Table 2. Postal Facility Areas that the Self-Employed Cleaner Could Access**

Postal Facility	Work Room Floor	Postmaster’s Office	Lobby
Post Office A	✓	✓	✓
Post Office B	✓		✓
Post Office C	✓		✓

Source: OIG analysis of sampled transactions.

The postmasters were unaware of policy requiring that cleaning occurs when Postal Service employees are on duty. One postmaster allowed a self-employed cleaner to come in after hours because the postal facility was a small post office. The postmaster stated the workroom is covered in parcels in the morning and, after retail opens, the lobby can be full of customers. The postmaster also stated that after hours is the best time for the cleaner to mop and clean. Another postmaster stated that the after-hours cleaning schedule was set up by the facility’s prior postmaster. The current postmaster thought it was questionable but kept the after-hours schedule in place.

When contractors access the workroom without Postal Service employee oversight, there is an increased risk that mail is not safeguarded. We advised both postmasters that policy prohibits self-employed cleaners from being at a postal facility when postal employees are not on duty. After discussions with the audit team, both postmasters took corrective action and adjusted the schedules of the self-employed cleaners to on duty hours. Since management adjusted cleaning schedules, we are not making a recommendation for after-hours cleaning schedules at this time.

<sup>15</sup> Issue Number 13, Section 722.42, Purchases from Postal Service Employees and Their Immediate Family Members.

<sup>16</sup> Section 273.453, Contractors.

## Recommendation #2

We recommend the **Vice President, Retail & Post Office Operations**, direct postmasters to review and comply with policy requirements for access codes and keyed locks.

## Finding #3: CMC Contract Cleaners Invoices

CORs responsible for approving CMC contract cleaners' invoices did not always validate that the work was performed before approving invoices for payment. CORs relied on postmaster-provided missed service days reports to validate supplier invoice information. However, postmasters did not always notify CORs of missed service days.

For three of six CMC contract cleaner invoices we reviewed, the supplier recorded credits on the invoice for missed service days, but there were no corresponding missed service days reports provided by the postmaster. Two invoices did not have missed days listed on the invoice and one was for a one time floor waxing service, not related to the contract.

Each Category Management Team (CMT)<sup>17</sup> in the CMC establishes its own procedures for obtaining the reports, specifically:

- The East CMT directed postmasters to use forms and procedures provided in the contractor's Welcome Package to submit missed days reports.
- The West CMT directed the postmasters to submit missed service days using the Service Request Form website. Upon submission, a copy of the report will be sent to the supplier and the CORs for appropriate action. The West CMT provided training and meetings when this program was launched in July 2020. It is now the only reporting system used by the West CMT team.

The COR's general responsibilities are outlined in the COR Letter of Appointment, including ensuring that work is accomplished according to the contract and protecting the Postal Service's interests. Further, the SOW for consolidated cleaning contracts states postmasters will provide the contracting officer written notification of contractor failure to show up and perform the tasks.

CMC personnel stated that postmasters do not always report missed days and that to get accurate missed service day counts, postmasters must report missed days. We did not identify policies or procedures that outline specific COR or postmaster responsibilities for overseeing CMC cleaning contracts.

When CORs do not properly validate cleaning services prior to paying CMC contract cleaning invoices, there is an increased risk of paying cleaners for work they did not perform.

## Recommendation #3

We recommend the **Vice President, Supply Management**, update and communicate policies and procedures for processing and paying contract cleaner invoices, to include validating the performance of contractor custodial services under Category Management Center issued orders, and procedures for postmasters or officers-in-charge to report missed service days.

## Management's Comments

Management generally agreed with the findings, recommendations, and monetary impact; however, they noted that corrective action was taken by postmasters at the time the OIG identified unsupervised suppliers accessing post offices for cleaning services. Management also appreciated the OIG revisiting the initial data provided in a draft of this report and making subsequent changes to the findings and results.

Regarding finding 1 and the associated recommendation, management reiterated that the OIG's scope was both local cleaning services purchased under local buying authority and those purchased under cleaning service contracts issued by Supply Management. Management sees value in providing further guidance to postmasters on managing local agreements and will update and clarify local

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*“Two invoices did not have missed days listed on the invoice and one was for a one time floor waxing service, not related to the contract.”*

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<sup>17</sup> The Facility Services' CMC is organized into teams focused on the requirements of each Postal Service Area; currently there are two teams responsible for CMC cleaning contracts.

cleaning policy and communicate updates to postmasters. They will also provide an annual communication over the next three fiscal years to postmasters, with the option to continue communications beyond this, if necessary for compliance. Management plans to implement this action by June 30, 2022.

Regarding finding 2 and the associated recommendation, management stated that in two of the three instances where contract cleaners were able to access workroom floors or had after-hours cleaning schedules, management took action during the audit to adjust schedules to limit self-employed cleaners to only on-duty hours. They are committed to ensuring all offices follow Postal Service policy regarding accessibility to workroom floors and/or after-hours cleaning schedules. Management will provide directions to postmasters to review requirements related to contractors for access codes and keyed locks. Management plans to implement this action by March 31, 2022.

Regarding finding 3 and the associated recommendation, management stated that the Missed Days Report (MDR) was intended to provide documentation to support payment intervention. Subsequently, the MDR was used in the Facility Services CMC for much the same purpose; however, for invoices processed by the CMC, the MDR provided documentation to support reconciliation prior to certification and processing, not interruption of recurring payments. Management further stated that the MDR is no longer relevant as the contracted supplier verifies and certifies in their invoice submission that services have been rendered. Management stated the Facility Services CMC will review the overall process

and clarify the method for verifying that services have been rendered prior to paying invoices. Management will update policies and procedures for payment of CMC issued cleaning service orders and how to report any performance issues. Management will also review policies for reporting performance issues that are included in supplier-provided Welcome Packets, and communicate changes to appropriate stakeholders. Management plans to implement this action by June 30, 2022.

See [Appendix B](#) for management's comments in their entirety.

## Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations in the report and corrective actions should resolve the issues identified. Regarding data revisions, we subsequently excluded CMC contract cleaners invoices from our initial statistical sample of invoices for cleaners performing under local agreements because they have different criteria. The exclusion did not affect the findings, but we limited our associated impact to the specific exceptions identified based on the resulting judgmental sample.

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

# Appendices

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# Appendix A: Additional Information

## Scope and Methodology

We extracted and analyzed contract cleaners' payment data from FY 2019 through FY 2020 from EDW. During that time, the Postal Service made about 183,600 payments, totaling \$99,447,803 to contract cleaners. We reviewed 205 payments to self-employed cleaners and 6 payments to CMC contactors.

To accomplish our objective, we:

- Reviewed Postal Service policies including *Cleaning Services Local Buying Guidelines, Supplying Principles & Practices*, and the *Administrative Support Manual*.
- Interviewed Postal Service personnel to gain an understanding of how agreements and contracts are established, how the Postal Service monitors cleaners, and how it processes payments and credits.
- Selected 40 postal facilities for site visits and interviews with postmasters and OICs to determine how specific sites implement policies.
- Reviewed source documentation, including CMC contracts and invoices, local agreements, pay authorizations, SOWs, and Daily Work Logs for compliance with payment policies and payment validity.

We conducted this performance audit from March through November 2021 in accordance with generally accepted government auditing standards and

included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on September 22, 2021, and included their comments where appropriate.

We assessed the reliability of contract cleaners' payment data obtained from EDW by comparing a random sample of invoices listed in EDW to invoice payment history in Oracle Accounts Payable<sup>18</sup> and other source documentation. Finally, we performed logical testing of the data and reviewed the extraction methodology to confirm that the data included only actions processed during our scope period. We determined that the data were sufficiently reliable for the purposes of this report.

## Prior Audit Coverage

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

<sup>18</sup> A system that supports the ASCs in issuing payments to Postal Service suppliers and vendors.

# Appendix B: Management's Comments



November 1, 2021

JOSEPH WOLSKI  
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Management Response - Payments to Contract Cleaners (Report Number 21-096 DRAFT)

Thank you for the opportunity to provide comments on the Office of Inspector General's (OIG) draft report entitled, "Payment to Contract Cleaners (Report Number 21-096 DRAFT)". We have reviewed the report and its recommendations. Management generally agrees with the findings, recommendations, and monetary impact; however, management notes that corrective actions have already been taken as concerns the limited circumstances found where unsupervised supplier access was allowed for cleaning services. Management is appreciative of the OIG revisiting the initial data and making subsequent changes to the findings and results.

## Findings

### Finding #1: Local Cleaning Services.

The scope of the OIG's audit covered both local cleaning services, which are purchased under local buying authority as defined in the Postal Service Administrative Support Manual (section 722, Local Buying Authority) and Handbook AS-709, Purchase Card Local Buying Policies and Procedures (see section 1-14.3 Cleaning Services), and cleaning service contracts issued by Supply Management (SM) contracting officers. Management concurs and sees value in providing further guidance to postmasters on managing local agreements.

### Finding #2: Access to Postal Service Property - Resolved occurrences.

The OIG audit states that postmasters sometimes permitted contract cleaners to access workroom floors and to clean when Postal Service personnel were not on duty. The report discusses this in the context of self-employed cleaners. Based upon the discussion, it appears that the OIG is referring to cleaners performing under local agreements.

Within the draft report there were three instances cited by the OIG where contract cleaners were able to access workroom floors or had after-hours cleaning schedules. In two of those instances, management took contemporaneous corrective action during the audit to adjust schedules to limit self-employed cleaners to only on-duty hours. Since management addressed after-hours cleaning at the time of the review, only one instance remains as the basis for Recommendation #2. Irrespective, management will ensure communications are provided to postmasters as to applicable security requirements. Management is committed to ensuring all offices follow Postal policy regarding accessibility to workroom floors and/or after-hours cleaning schedules.

475 L'ENFANT PLAZA SW  
WASHINGTON DC 20260-6201  
WWW.USPS.COM

Finding #3: CMC Contract Cleaners Invoices

The Missed Days Report (MDR) is a tool implemented initially for local agreements that resulted in recurring payments being established in the systems of the San Mateo [CA] Accounting Service Center so suppliers would be paid timely and without additional actions by USPS personnel. As designed, the MDR was intended to provide San Mateo with documentation to support payment intervention.

Subsequently in the prior requirements for cleaning contracting, the MDR was adopted for use in the Facility Services Category Management Center (FSCMC) for much the same purpose; however, in the case of the invoices processed by the CMC, the MDR provided documentation to support reconciliation of supplier invoices prior to certification and processing, not interruption of recurring payments.

As the model leveraged for contracted custodial services has evolved, the MDR is essentially no longer relevant as the contracted supplier verifies and certifies in their invoice submission that services have been rendered. The Facility Services CMC will review the overall process and provide clarity with respect to the methodologies employed for verifying that services have been rendered prior to processing and paying invoices.

**Recommendations**

Recommendation #1:

We recommend the **Vice President, Supply Management** and the **Vice President, Retail and Post Office Operations**, update and clarify local cleaning policies to include implementing guidelines for specific field situations; and communicate the updated policies and guidelines to postmasters at least annually, given the movement of personnel within the postmaster category.

Management Response:

Management agrees with this recommendation. Supply Management (SM) will update and clarify local cleaning policy, to include implementing guidelines for specific situations, for Retail and Delivery communication and distribution to Postmasters. An annual communication will be provided by the Vice President, Retail and Delivery over the next three Fiscal Years, with consideration of continuation if determined necessary for policy compliance.

Target Implementation Date: June 30, 2022

Responsible Official:

Director, Supply Management Infrastructure, Supply Management  
Manager, Retail and Post Office Operations Policy and Practices, Retail & Post Office Operations

Recommendation #2:

We recommend the **Vice President, Retail and Post Office Operations**, direct postmasters to review and comply with policy requirements for access codes and keyed locks.

Management Response:

Management agrees with this recommendation. Management will provide directions to postmasters to review policy requirements related to contractors for access codes and keyed locks.

Target Implementation Date: March 31, 2022

Responsible Official:

Manager, Retail and PO Operations Policy and Practices, Retail and Post Office Operations

Recommendation #3:

We recommend the **Vice President, Supply Management**, update and communicate policies and procedures for processing and paying contract cleaner invoices, to include validating the performance of contractor custodial services under Category Management Center issued orders, and procedures for postmasters or officers-in-charge to report missed service days.

Management Response:


Management agrees with this recommendation. Supply Management will update current policies and procedures for payment of CMC issued cleaning service orders and how to report any performance issues.

Current cleaning suppliers are required by the terms of their contracts to send a Welcome Packet at the beginning of the contract to postmasters which includes the Statement of Work and outlines the instructions for reporting any contract cleaner performance issues. These policies are outlined in the Welcome Packets. SM's FSCMC will review the guidance and update as necessary and communicate any policy changes to the appropriate stakeholders.

Target Implementation Date: June 30, 2022

Responsible Official:

Executive Manager, Facility Services CMC, Supply Management

 E-SIGNED by Cara M Greene  
on 2021-11-01 11:22:07 CDT

Cara M. Greene  
VP, Controller

 E-SIGNED by MARK GUILFOIL  
on 2021-11-01 12:14:02 CDT

Mark A. Guilfoil  
VP, Supply Management

 E-SIGNED by Elvin Mercado  
on 2021-11-01 10:54:35 CDT

Elvin Mercado  
Vice President, Retail and Post Office Operations

cc: Manager, Corporate Audit Response Management



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