



Office of Inspector General | United States Postal Service

## Audit Report

# U.S. Postal Inspection Service Case Management of Arrests

Report Number 21-099-R22 | October 27, 2021



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# Highlights

## Objective

Our objective was to evaluate the U.S. Postal Inspection Service's oversight of case management reporting requirements related to arrests. We also determined whether the Postal Inspection Service reports its results to National Instant Criminal Background Check System.

Postal Inspection Service inspectors lead investigations involving postal crimes such as mail fraud and mail theft, execute federal search warrants, and make arrests. They also participate in investigations with other federal, state, and local law enforcement agencies that have a postal nexus, such as mailing of illegal drugs. The requirements for conducting and documenting their investigations are in the *Case Management Reporting Guidelines* (the Guidelines) and Case Closing Checklist. Inspectors use the Case Management System (CMS) to document investigations and arrests. In fiscal year (FY) 2020, postal inspectors reported 4,803 arrests and 3,642 convictions related to postal crimes.

We selected a stratified random sample of 190 cases closed in FY 2020 that had associated arrests and reviewed the first arrest for each case to determine whether case documentation in CMS contained support for arrests and met reporting requirements.

## Findings

The Postal Inspection Service did not provide consistent oversight of case management reporting requirements related to arrests. We identified opportunities to strengthen enforcement of case documentation requirements, align the Guidelines and CMS, and improve guidance on when the Postal Inspection Service should be considered the lead investigative agency. We

also found that the Postal Inspection Service is compliant with National Instant Criminal Background Check System reporting requirements.

CMS did not consistently contain case documentation related to arrests required by the Guidelines, such as fingerprints, photographs, or interviews in the 190 cases we reviewed. Additionally, arrest options provided to inspectors in CMS did not align with the types of arrests in the Guidelines. These documentation deficiencies occurred because team leaders did not properly complete case closing checklists and no management process exists to ensure these checklists are completed. Consequently, the Postal Inspection Service lacks assurance that postal inspectors are properly claiming the type of arrests. As a result of the missing documentation, we estimate total unsupported questioned costs to be \$36,285 for workhours associated with arrests in FY 2020.

We also found postal inspectors incorrectly selected the Postal Inspection Service as the lead agency in 23 of 125 (18 percent) cases in CMS that identified the Inspection Service as lead agency. This issue occurred because the Guidelines do not specify how to determine the lead agency for a case or how to document the decision, potentially causing lead agency determinations to improperly contribute to management decisions about personnel and funding.

## Recommendations

We recommended management:

- Create a process to ensure case documentation requirements, including those needed to support the type of arrests claimed, are enforced.
- Update *Case Management Reporting Guidelines* to provide criteria for determining the lead agency for a case and how to document that decision.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

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October 27, 2021

**MEMORANDUM FOR:** GARY R. BARKSDALE  
CHIEF POSTAL INSPECTOR

*Margaret B. McDavid*

**FROM:** Margaret B. McDavid  
Deputy Assistant Inspector General  
for Inspection Service and Cybersecurity and Technology

**SUBJECT:** Audit Report – U.S. Postal Inspection Service Case  
Management of Arrests (Report Number 21-099-R22)

This report presents the results of our audit of the U.S. Postal Inspection Service Case Management of Arrests.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Elizabeth Kowalewski, Director, Inspection Service, 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 the U. S. Postal Inspection Service's Case Management of Arrests (Project Number 21-099). Our objective was to evaluate the Postal Inspection Service's oversight of case management reporting requirements related to arrests. We also determined whether the Postal Inspection Service reports its results to the National Instant Criminal Background Check System (NICS). See [Appendix A](#) for additional information about this audit.

## Background

The Postal Inspection Service is a law enforcement agency whose mission is to defend the nation's mail from illegal or dangerous use, perform crime prevention activities, and function as a security arm of the U.S. Postal Service. To accomplish this mission, postal inspectors lead investigations involving postal crimes such as mail fraud and mail theft, execute federal search warrants, and make arrests. They also participate in investigations with other federal, state, and local law enforcement agencies that have a postal nexus, such as the mailing of illegal drugs.

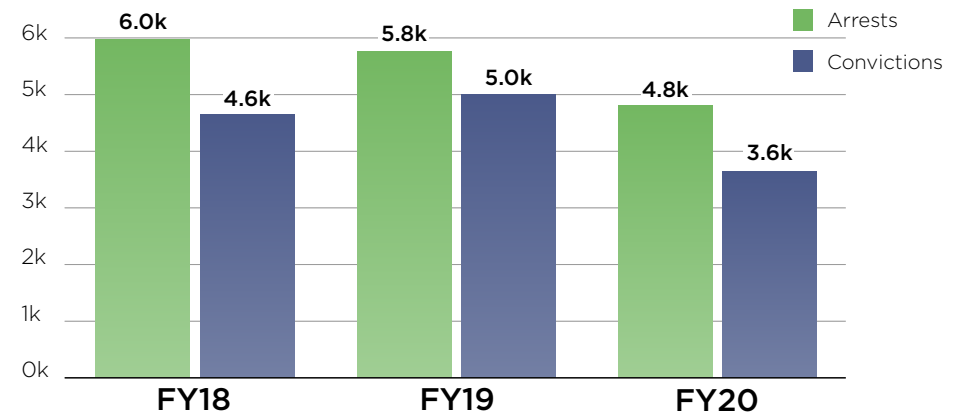
*“To accomplish this mission, postal inspectors lead investigations involving postal crimes such as mail fraud and mail theft, execute federal search warrants, and make arrests.”*

The Postal Inspection Service's *Case Management Reporting Guidelines* (the Guidelines) and Case Closing Checklist provide the requirements for postal inspectors to follow when conducting and documenting their investigations. Among other things, the Guidelines detail when postal inspectors are to report arrests in the Case Management System (CMS).<sup>1</sup>

In fiscal year (FY) 2020, postal inspectors reported 4,803 arrests and 3,642 convictions related to postal crimes, primarily those involving mail theft, mail fraud, and prohibited mailings. In FY 2019 postal inspectors reported 5,759 arrests with 4,995 convictions and in FY 2018 they reported 5,969 arrests with 4,648 convictions. See Figure 1 for detailed numbers of arrests and convictions.

*“In fiscal year (FY) 2020, postal inspectors reported 4,803 arrests and 3,642 convictions related to postal crimes, primarily those involving mail theft, mail fraud, and prohibited mailings.”*

**Figure 1. Postal Inspection Service Arrests and Convictions FYs 2018 - 2020**



Source: U.S. Postal Service Office of Inspector General (OIG) analysis of USPIS Annual Reports, FYs 2018 - 2020.

<sup>1</sup> FY 2020 *Case Management Reporting Guidelines*, Section 120 - the Case Management System is an online database designed to document and track investigative activities.

Per the Guidelines,<sup>2</sup> postal inspectors report arrests in the following five circumstances:

- Investigative efforts with another law enforcement agency that motivate and materially contribute to identifying and arresting a person for a postal crime, even if the postal inspector was not present at the time (a material contribution).
- An arrest made by or in the presence of a postal inspector on an inspector's investigative initiative.
- An arrest made by an outside agency based on a Postal Inspection Service warrant.
- Investigation of a postal offense that develops additional significant evidence and is brought to the attention of the prosecutor, preferably in writing.
- A National Headquarters (NHQ)-approved task force arrest.

We refer to these circumstances later in this report as types of arrest.

When individuals arrested in cases have characteristics known as “prohibitors”,<sup>3</sup> the Brady Act requires the relevant individual be reported to the NICS to ensure they do not obtain or possess a firearm in the future. The Fix NICS Act of 2018<sup>4</sup> requires federal agencies and departments to certify whether they have provided disqualifying records of individuals prohibited from receiving or possessing a firearm to the NICS and establish and substantially comply with an implementation plan to maximize record submissions and verify their accuracy. However, the Fix NICS Act does not explicitly include the Postal Service or Postal Inspection Service; therefore, reporting to the NICS remains voluntary for the Postal Inspection Service.

We selected a stratified random sample of 190 cases closed in FY 2020 that had associated arrests. We reviewed the first arrest for each case to determine whether case documentation in CMS contained support for arrests and met reporting requirements.

## Findings Summary

The Postal Inspection Service did not provide consistent oversight of case management reporting requirements related to arrests. We identified opportunities to strengthen enforcement of existing documentation requirements, align the Guidelines and CMS, and improve guidance on claiming to be the lead agency. We also found that the Postal Inspection Service has been voluntarily submitting certifications to the Department of Justice in compliance with the Fix NICS Act of 2018 since July 2019.

### Finding #1: Case Documentation

The Postal Inspection Service did not provide consistent oversight of case management reporting requirements related to arrests. Specifically, CMS did not consistently contain all required case documentation for the 190 cases we reviewed and data options in CMS did not align with the Guidelines. As shown in [Figure 2](#), inspectors did not attach fingerprints and palm prints for 174 cases (92 percent) and did not enter timely updates of

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***“Inspectors did not attach fingerprints and palm prints for 174 cases and did not enter timely updates of investigative details consistently for 21 cases or prosecutive actions for 20 cases.”***

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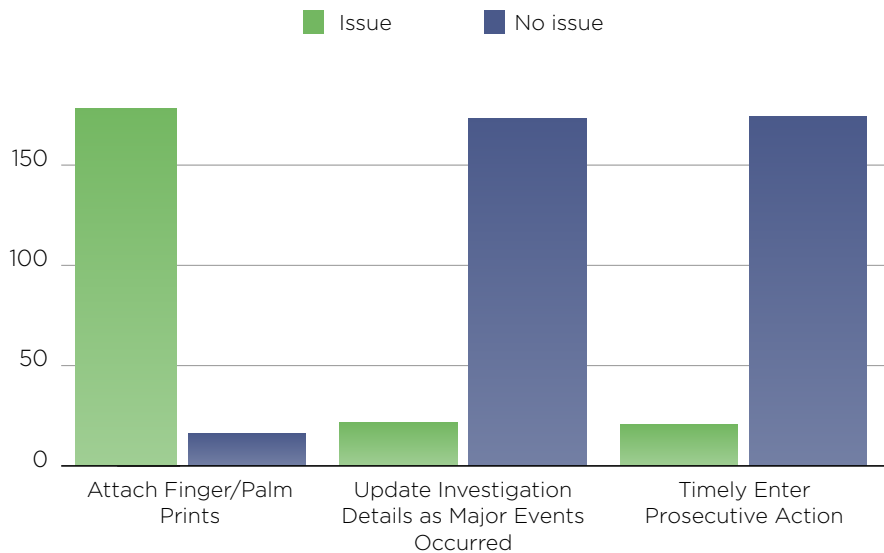
<sup>2</sup> FY 2020 Case Management Reporting Guidelines, pg. 17.

<sup>3</sup> Brady Handgun Violence Prevention Act, 18 U.S.C. 921-922. Requires the U.S. Attorney General to establish the NICS for federal firearms licensees to contact by telephone, or other electronic means, for information to be supplied immediately as to whether the transfer of a firearm would violate the Gun Control Act or state law. The prohibitors are: (1) felons; (2) fugitives from justice; (3) persons under indictment; (4) persons unlawfully using or addicted to any controlled substance; (5) persons adjudicated “mentally defective” or committed to a mental institution; (6) illegal/unlawful aliens, and aliens admitted on a non-immigrant visa; (7) persons dishonorably discharged from the military; (8) citizen renunciates; (9) persons subject to a domestic violence restraining order; and (10) persons convicted of a misdemeanor crime of domestic violence.

<sup>4</sup> Fix NICS Act of 2017- H.R.4477- 115th Congress.

investigative details consistently for 21 cases (11 percent) or prosecutive actions for 20 cases (10.5 percent).<sup>5</sup>

**Figure 2. Closed Arrest Case Management Analysis**



Source: OIG analysis of case files in CMS.

During our review, we also found the case files did not contain handwriting samples for all 190 cases reviewed (100 percent) or photographs for 116 cases (61 percent).<sup>6</sup> While the FY 2020 guidelines required these documents for all cases, management stated that these would only be included in the case file if they were necessary to complete the investigation. The Postal Inspection Service

updated the Guidelines in FY 2021 to reflect that not all cases require these documents to complete the investigation.

Further, 24 of 190 cases (13 percent), were missing the documentation required to support the type of arrest claimed. Based on our stratified random sample, we projected that 306 cases closed in FY 2020 are similarly missing the documentation required to support the type of arrest claimed.

***“Further, 24 of 190 cases, were missing the documentation required to support the type of arrest claimed.”***

The 24 cases we identified in our sample claimed the following types of arrests:

- Sixteen (67 percent) were reported as material contributions.
- Seven (29 percent) were reported as arrests made by a postal inspector or conducted in their presence.
- One (4 percent) was reported as an arrest made by an outside agency based on a Postal Inspection Service warrant.

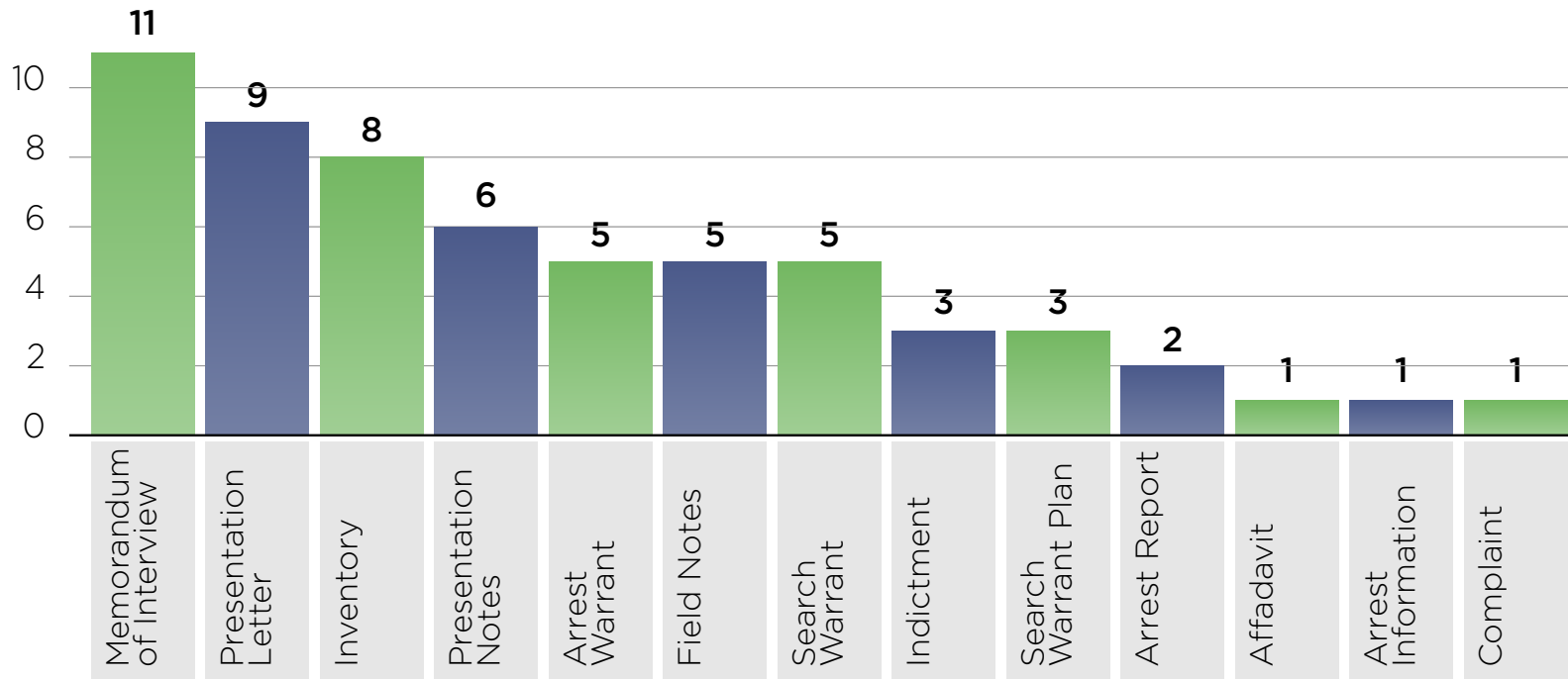
As shown in [Figure 3](#), memorandums of interviews and presentation letters<sup>7</sup> were the most common type of required document missing. All the missing documentation we identified for the 24 cases is required by the Closed Case File Checklist.

<sup>5</sup> According to the Guidelines, postal inspectors must update investigation details at least every six months and as major events occur such as arrests, indictments, warrants and any prosecutive results. Similarly, inspectors must enter a prosecutive action such as arrests, acquittals, convictions, and dismissals in CMS within 21 days of the event.

<sup>6</sup> According to the Guidelines, juvenile offenders are not formally arrested. One of 190 cases involved a juvenile offender; therefore, a photograph was not required.

<sup>7</sup> ISM Section 5.9.5 - presentation letters are formal reports to the U.S. Attorney’s Office or state or local prosecutor furnishing a description of a Postal Service offense, evidence that the named offender committed the offense, and background information about the offender.

**Figure 3. Missing Documentation Required to Support Claimed Arrest Type**



Source: OIG analysis of case files in CMS.

Note: The 24 cases could be missing multiple types of required documents; therefore, the number of missing documents in the figure is greater than 24.

The Guidelines also require inspectors to include documentation of arrests resulting from an NHQ-approved task force. We could not assess if this was done because CMS does not have this option for inspectors. We also found that CMS included an arrest option<sup>8</sup> that was a type of arrest in the Guidelines, because management did not update CMS to reflect revisions to the Guidelines. During the audit, management requested an update to CMS and the Guidelines which will ensure they align; therefore, we are not making a recommendation on this issue.

***“Management requested an update to CMS and the Guidelines which will ensure they align; therefore, we are not making a recommendation on this issue.”***

The Guidelines and the Closed Case File Checklist detail numerous documentation requirements related to arrests,<sup>9</sup> including the documents referenced in Figures 2 and 3. Additionally, according to the Guidelines, team

<sup>8</sup> Inspectors could choose “a multiple arrest of an individual” in CMS which is not listed in the Guidelines.

<sup>9</sup> FY 2020 *Case Management Reporting Guidelines*, Section 731- Team Leader or Assistant Inspector-in-Charge reviews and ensures that all official files for cases requested for closing are in proper sequence in accordance with the closed case checklist; Section 270 - Refer to the Case Closing Checklist for required physical and electronic documents.



leaders must review all cases before they are closed to ensure appropriate documents are attached for processing in CMS.

In the 24 cases where documentation was not sufficient to support the type of arrest claimed, team leaders did not properly use the Closed Case File Checklist to ensure the documents needed to support the type of arrest claimed were in the case file and there is no management process to do so. When case files lack critical information related to arrests, the Postal Inspection Service lacks assurance that postal inspectors are properly claiming the type of arrests. Based on the number of cases with missing or incomplete documentation, the time allotted to the team leader for case file review was not effectively used. We estimate the total unsupported questioned costs to be \$36,285 for workhours associated with arrests in FY 2020.

#### Recommendation #1

We recommend the **Chief Postal Inspector** create a process to ensure case documentation requirements, including those needed to support the type of arrests claimed, are enforced.

### Finding #2: Lead Agencies

We found that postal inspectors incorrectly selected the Postal Inspection Service as the lead agency. Specifically, 23 of 125 CMS case files (18 percent)<sup>10</sup> we reviewed did not support the postal inspector's identification of the Inspection Service as the lead agency.

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*“We found that postal inspectors incorrectly selected the Postal Inspection Service as the lead agency.”*

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Per the Guidelines, inspectors are to select the lead agency in CMS when submitting the case for jacketing approval. However, the Guidelines do not provide criteria for how postal inspectors should determine whether to claim lead agency. For example, in 10 cases we reviewed, the Inspection Service was

identified as the lead agency because the cases were prosecuted as federal cases, but the Guidelines do not identify this as a reason to identify the Inspection Service as lead agency. The Guidelines also do not require inspectors to provide documentary support as to why they determined that the Postal Inspection Service should be selected as the lead agency. As a result, team leaders do not have the information required to review whether postal inspectors appropriately selected the Postal Inspection Service as the lead agency.

Without a policy identifying when postal inspectors should claim lead agency and how they should document their decision, lead agency determinations may improperly contribute to management decisions about personnel and funding.

#### Recommendation #2:

We recommend the **Chief Postal Inspector** update *Case Management Reporting Guidelines* to provide criteria for determining the lead agency for a case and how to document that decision.

### Management's Comments

Management did not agree with finding 1 and partially agreed with finding 2, partially agreed with recommendation 1, and agreed with recommendation 2.

Regarding finding 1, management did not agree that a lack of documentation in CMS correlates with insufficient support for the type of arrest claimed. Specifically, management stated that *Case Management Reporting Guidelines* do not require all cases to contain handwriting samples and do not outline documentation required for each type of arrest claimed. As a result, management stated that the OIG's conclusions related to missing case documentation are invalid.

Regarding recommendation 1, management agreed with the need to ensure that case documentation requirements are enforced but did not agree that creating a process for that is necessary. However, the Chief Postal Inspector stated that he will continue evaluating their adherence to case documentation requirements for potential improvements. The target implementation date is June 30, 2022.

<sup>10</sup> Of the 190 cases in our review, inspectors identified the Inspection Service as the lead agency in 125 cases in CMS.

Regarding finding 2, management agreed that the Guidelines do not provide clear criteria for how inspectors should determine whether to claim lead agency and how to document that determination. However, management stated they do not agree with the methodology the OIG used during its analysis of case files.

Regarding recommendation 2, management agreed that if they determine that it is valuable to track the lead agency attribute, they will update the Guidelines to provide criteria for documenting that decision. The target implementation date is January 31, 2022.

Regarding monetary impact, management did not agree with the methodology used to determine the monetary impact because the process of reviewing a case file for closure involves more aspects of the case investigation than just a review of claimed arrests.

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.

Regarding finding 1, during the audit, management reviewed the 24 cases we identified as having missing documentation to support the type of arrest claimed. Management agreed that the documentation present in CMS did not support the type of arrest claimed for all 24 cases. Further, the FY 2020 Guidelines instruct inspectors to "attach handwriting exemplars to the biometrics module in the Case Management automated case file." The FY 2020 Guidelines do not indicate that

such exemplars may not be present for all cases. As noted on page 4 of the report, however, the Postal Inspection Service modified the Guidelines in FY 2021 to clarify that not all cases require these documents. Specifically, the FY 2021 Guidelines grouped together requirements associated with handwriting and other biometric information, stating that inspectors should attach these to CMS "when possible."

Regarding finding 2, we reviewed all available case documentation to determine whether the lead agency designation was warranted. During the audit, management reviewed the 23 cases we identified where postal inspectors incorrectly identified the Postal Inspection Service as the lead agency. Management agreed that the Postal Inspection Service should not have been selected as the lead agency in any of the 23 cases.

Regarding monetary impact, we agree that the case file review for case closure involves more aspects of case investigation than just a review of the claimed arrests. Therefore, we took a conservative approach in assessing the time it would reasonably take for a team leader to review documents associated with a particular arrest, assigning a single hour to the task.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. 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

The scope of our audit included a review of closed cases from October 1, 2019, to September 30, 2020. We reviewed a stratified random sample of 190 closed cases with arrests.

To accomplish our objective, we:

1. Reviewed criteria in the Guidelines to identify policies and procedures related to arrest case management and required documentation from CMS for arrests.
2. Developed checklists to review closed cases with arrests to ensure case management requirements are followed in accordance with FY 2020 Guidelines.
3. Requested from Inspection Service closed cases for FY 2020 with arrests and selected a stratified random sample of 190 closed, jacketed case files containing at least one arrest. We reviewed the first arrest listed in each case to assess whether it met case management guidelines.
4. Interviewed selected Assistant Inspectors-in-Charge and team leaders to determine whether employees were following case management policies and procedures.

5. Interviewed the OIG Office of Investigation to identify their best practices for recording arrests in their cases. This included the size of the agency, the number of special agents, and other criteria identified based on research.
6. Interviewed Inspection Service management and reviewed relevant reports about the Inspection Service's implementation of the Fix NICS Act of 2018.

We conducted this performance audit from March through October 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 30, 2021 and included their comments where appropriate.

We assessed the reliability of CMS data by reviewing source documents and interviewing responsible personnel knowledgeable about the 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
<i>Review of Postal Inspection Service Criminal and Administrative Processes - Fort Worth Division</i>	Assess Postal Inspection Service compliance with criminal and administrative processes, including the effectiveness of internal controls.	HR-AR-19-002	4/19/2019	None

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Division Reviews: U.S. Postal Inspection Service New York Division</i>	Determine whether the Postal Inspection Service, NY Division, implemented effective controls for case management, accountable property, and training.	OV-AR-19-004	9/19/2019	None
<i>Division Reviews: U.S. Postal Inspection Service Charlotte Division</i>	Determine whether the Postal Inspection Service, Charlotte Division, implemented effective controls for accountable property, training, and case management.	19TG013OV000-R20	11/15/2019	None

# Appendix B: Management's Comments



GARY R. BARKSDALE  
CHIEF POSTAL INSPECTOR  
UNITED STATES POSTAL INSPECTION SERVICE

October 21, 2021

JOSEPH WOLSKI  
DIRECTOR, AUDIT OPERATIONS

SUBJECT: U.S. Postal Inspection Service Case Management of Arrests  
(Project Number 21-099-DRAFT)

Thank you for the opportunity to review and comment on the findings, recommendations, and the monetary impact contained in the draft audit report, *U.S. Postal Inspection Service Case Management of Arrests*.

Management agrees in part with the findings and will address them below.

#### Finding 1: Case Documentation

Management does not agree with this finding, which attempts to correlate a lack of documentation in Case Management to improper or insufficient support of the type of arrest claimed.

The objective of this audit was to evaluate the U.S. Postal Inspection Service's (USPIS) oversight of Case Management reporting requirements related to arrests. Management believes that the U.S. Postal Service Office of Inspector General (OIG) misinterpreted the USPIS' *Case Management Reporting Guidelines* (the Guidelines) and the Case Closing Checklist. This misinterpretation significantly contributed to invalid conclusions made by the OIG during their analysis of case files.

Specifically, page 4 of the report states that "case files did not contain handwriting samples for all 190 cases reviewed (100 percent)." Management previously explained that handwriting samples are only included in Case Management if they were relevant to the investigative process of the case. The report further states that the "FY 2020 guidelines required these documents for all cases." It was explained to OIG that the Guidelines only required this documentation if it applied to the case. The investigative process and the Case Management requirements pertaining to those areas are not always applicable to the process of claiming an arrest.

Page 4 of the report states that "24 of 190 cases (13 percent) were missing the documentation required to support the type of arrest claimed." Management disagrees with this statement. The Guidelines outline the five circumstances for which an arrest may be claimed. The Guidelines do not outline required documentation specific to each type of arrest claimed, nor does it state that the type of the arrest would be unsupported by the lack of those documents. The report indicates that "all the missing documentation [OIG] identified for the 24 cases is required by the Closed Case File Checklist" (page 5 of the report). OIG then incorrectly applied this checklist as a standard to determine if the type of arrest claimed was properly supported.

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Washington, D.C. 20260-3100  
[www.uspis.gov](http://www.uspis.gov)

Page 5 of the report states "the Guidelines also require inspectors to include documentation of arrests resulting from an NHQ-approved task force." Management disagrees with this statement. The report continues with "we could not assess if this was done because CMS does not have this option for inspectors." Management again disputes that even if Case Management had this arrest type as an option, there should not be any implication that this arrest type would be unsupported. The Guidelines only outline the five circumstances for which an arrest may be claimed. Again, the Guidelines do not outline required documentation specific to each type of arrest claimed. In this instance, Management agrees that Case Management did not include the option to select whether the arrest resulted from an NHQ-approved task force, but did list this as a circumstance in the Guidelines for which an arrest may be claimed. As a result, Management requested an update to both Case Management and the Guidelines to ensure they aligned.

Management agrees that "team leaders must review all cases before they are closed to ensure appropriate documents are attached" (page 5 of the report). However, Management does not agree with OIG's analysis of the lack of documentation in the case files being applied to their determination of whether the arrest type was supported.

Management does not agree with OIG's interpretation of the USPIS' guidelines, and therefore we do not agree to this finding. Further, Management does not agree with OIG's assessment of "unsupported questioned costs" (page 6 of the report) and the resulting monetary impact.

#### Finding 2: Lead Agencies

Management agrees in part with this finding. While we agree that the Guidelines do not provide clear criteria for how inspectors should determine whether to claim lead agency and how to document that determination, Management does not agree with the methodology used by OIG during their analysis of the case files. During the audit process, Management asked how OIG determined if a case file properly selected lead agency or not, if OIG found that the USPIS does not have clear guidance as to how that determination should be made and supported. If OIG believes there is a lack of clear guidance as to how that determination should be made, it appears unreasonable for OIG to then opine in the absence of such clear guidance on whether lead agency was appropriately claimed.

#### Management does not agree to the monetary impact.

The monetary impact states "[OIG] found the following type of documentation missing: Memorandum of Interviews, Presentation Letters, Inventory, Presentation Notes, Arrest Warrants, Field Notes, Indictments, Search Warrant Plans, Arrest Reports, Affidavits, Arrest Information, and Complaints." OIG then used a methodology that "resulted in a projection of 306 arrests with inadequate documentation."

OIG generally applies a case file's lack of documentation, whether it is lacking one document or all the documents listed above, to the validity for whether a type of arrest is supported. Management agrees with the need to ensure case documentation requirements are enforced, but we do not agree with OIG's methodology for how this deficiency was applied to their assessment of the USPIS' oversight of Case Management reporting requirements related to arrests.

Management explained to OIG that the process of reviewing a case file for closure involves more aspects of the case investigation than just a review of the claimed arrest(s). We disagree with OIG's assumption that one workhour for a Team Leader to review the case for closure should be

questioned as "not effectively used" (page 6 of the report) if the case file was found to lack one document or several documents. Further, by nature of there being other aspects of the case to review, Management does not agree that a lack of documentation invalidates the Team Leader's workhour.

Management disagrees with the methodology used to determine the monetary impact, and therefore we do not agree to the monetary impact in its entirety.

Management agrees in part with the recommendations and will address them below.

Recommendation 1: We recommend the **Chief Postal Inspector** create a process to ensure case documentation requirements, including those needed to support the type of arrests claimed, are enforced.

Management Response/Action Plan: Management agrees in part with this recommendation. We do not agree with the portion of the recommendation that suggests the Chief Postal Inspector should create a process to ensure case documentation requirements are enforced. On October 4, 2021, following the Exit Conference with OIG, we provided our proposed suggestion for Recommendation 1: ***"We recommend the Chief Postal Inspector ensure case documentation requirements, including those needed to support the type of arrests claimed, are enforced."***

The USPIS currently has established processes to ensure case documentation requirements are enforced. Creating a separate process, in addition to those already in place, would be redundant and would not improve compliance with the established processes.

Management does agree with the need to ensure case documentation requirements are enforced. This can be accomplished by improving compliance to established processes. During FY 2020, virtual Team Leader summits were held to provide training and resources to further develop the effectiveness of the Team Leader's role in reviewing whether Case Management documentation requirements were met by the case Inspector. The Chief Postal Inspector will continue to evaluate the USPIS Compliance Program, with regard to case documentation requirements, for potential improvements to our agency's adherence to those requirements.

Target Implementation Date: June 30, 2022

Responsible Official: Chief Postal Inspector

Recommendation 2: We recommend the **Chief Postal Inspector** update *Case Management Reporting Guidelines* to provide criteria for determining the lead agency for a case and how to document that decision.

Management Response/Action Plan: Management agrees with this recommendation only if the Chief Postal Inspector determines that there is actually a need to continue tracking the lead agency attribute. If it is determined that there is value in tracking this attribute, then the *Case Management Reporting Guidelines* will be updated to provide criteria for determining the lead agency for a case and how to document that decision. If it is determined that tracking this attribute does not provide any value to the USPIS, then it will be eliminated as a tracked attribute.

Target Implementation Date: January 31, 2022



Responsible Official: Chief Postal Inspector

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Barksdale', with a long horizontal flourish extending to the right.

Gary Barksdale  
Chief Postal Inspector

cc: Manager, Corporate Audit Response Management

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**INSPECTOR  
GENERAL**  
UNITED STATES POSTAL SERVICE

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