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Transmittal Letter



May 24, 2021

MEMORANDUM FOR: BRITTON SOTO

SOUTHERN CALIFORNIA DIVISION DIRECTOR,

PROCESSING OPERATIONS

FROM: Adam Bieda

Director, Plant Evaluation Team

SUBJECT: Audit Report – Delayed Mail at the Santa Ana, CA

Ato Breto

Processing and Distribution Center (Report Number 21-119-R21)

This report presents the results of our audit of Delayed Mail at the Santa Ana, CA, Processing and Distribution Center.

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

Attachment

cc: Postmaster General

Chief Logistics and Processing Operations Officer and Executive Vice President Vice President, Western Regional Processing Operations Corporate Audit and Response Management

Results

Background

The U.S. Postal Service considers mail to be delayed when it is not processed in time to meet the established delivery day. Delayed mail can adversely affect Postal Service customers and harm the organization's brand.

The Postal Service launched the Mail Condition Visualization (MCV) system in January 2019. The application's intent is to provide near real-time visibility of a facility's on-hand volume, delayed inventory volume, delayed dispatch volume¹, and oldest mail date by mail category and processing operation. MCV receives data from handheld devices used in mail processing operations, Surface Visibility² scans, and mailer documentation. The MCV application calculates delayed mail inventory daily by determining the number of mailpieces that have not received their next expected processing operation scan by 6:59 a.m. for destinating final processing operations and by 6:00 a.m. for all other operations.

Two important processing operations are the Managed Mail Program and Delivery Point Sequence (DPS). Mail originating from one mail processing facility that requires additional processing at a destinating facility before delivery is part of the Managed Mail Program. Once the managed mail is processed, it is prepared for DPS, which is an automated process of sorting mail into delivery order by carrier routes. DPS requires sorting the mail twice, with a first pass used to scan the addresses and then a second pass to sort the mail to the sector, segment, or carrier walk sequence.

We analyzed delayed inventory volumes from mail processing facilities nationwide as reported in MCV and found the Santa Ana, CA, Processing and Distribution Center (P&DC) ranked the third highest for delayed inventory and sixth highest for processed³ volume from January 1, 2020, to January 31, 2021 (see Table 1).

Table 1. Facilities with the Most Delayed Mail

Facility Name	Delayed Inventory	Processed Volume
North Houston, TX, P&DC	3,948,114,992	6,678,976,727
Phoenix, AZ, P&DC	2,804,953,269	6,651,306,074
Santa Ana, CA, P&DC	2,446,085,327	5,307,846,783
Sacramento, CA, P&DC	2,410,094,935	4,983,886,697
Michigan Metroplex, MI, P&DC	2,301,281,871	4,043,613,609

Source: MCV and Web Management Operating Data System.⁴

Specifically, we reviewed operations at the Santa Ana P&DC from January 1, 2020, to January 31, 2021, and found DPS totaled over 2.2 billion mailpieces (or 90.1 percent) and managed mail totaled about 218.8 million mailpieces (or 8.9 percent) of delayed inventory. See Table 2 for delayed inventory by operation at the Santa Ana P&DC.

¹ Occurs when containers (of mail) are not loaded on the last available mode of transportation to its destination to meet intended delivery day.

² A concept using barcode technology that allows the tracing of barcoded mail as it passes through the postal system in real time by the piece, container, or trailer.

³ The total volume of the first handling pieces and subsequent handling pieces for manual operations. For machine operations, total pieces handled is total pieces fed (minus any reworks or rejects).

⁴ An application used to gather, store and report data on workload, work hours, and machine utilization.

Table 2. Delayed Mail by Operation at the Santa Ana P&DC

Type of Operation	Processing Operation	Delayed Mail	Percentage to Total Delayed Mail
DPS	First-Class Letter (second pass)	844,706,140	34.5%
DPS	Marketing Letter (second pass)	735,655,991	30.1%
DPS	First-Class Letter (first pass)	448,858,931	18.4%
DPS	Marketing Letter (first pass)	175,124,601	7.2%
Managed Mail Program	First-Class Outgoing Primary Letter	114,320,585	4.7%
Managed Mail Program	First-Class Incoming Primary Letter	46,368,861	1.9%
Managed Mail Program	Marketing Incoming Secondary Flat	18,157,930	0.7%
Managed Mail Program	Marketing Incoming Primary Letter	15,243,070	0.6%
Managed Mail Program	First-Class Incoming Secondary Flat	13,359,399	0.5%
Managed Mail Program	First-Class Box Letter	11,330,612	0.5%
Other Operations	Miscellaneous Operations	22,959,207	0.9%
Total		2,446,085,327	100%

Source: MCV.

A portion of the audit scope and our site observations occurred during the novel coronavirus (COVID-19) pandemic. The Postal Service experienced decreased employee availability and increased package volume during this time, which impacted operations nationwide.

Objective, Scope, and Methodology

Our objective was to determine the cause of delayed mail at the Santa Ana, CA, P&DC.

We analyzed delayed mail data in MCV from January 1, 2020, to January 31, 2021. We interviewed Santa Ana P&DC management and observed mail processing and dock operations on March 16 – 18, 2021. Additionally, we looked at Surface Visibility scans and calculated volume processed using data from Web Management Operating Data System. Furthermore, we reviewed the Service Analysis and Assessment dashboard to identify the operational clearance performance for the Santa Ana P&DC in comparison to national targets and trends.

We assessed the reliability of data from these systems by interviewing agency officials knowledgeable about the data and reviewing related documentation. We determined that the data used was sufficiently reliable for the purposes of this report.

We conducted this audit from March through May 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 May 7, 2021 and included their comments where appropriate.

Finding #1: Delayed Mail Reported in Mail Condition Visualization

From January 1, 2020, to January 31, 2021, the MCV application reported over 2.4 billion pieces of delayed inventory at the Santa Ana P&DC. Management at this facility was concerned with the high amount of reported delayed inventory since their service standard scores⁵ had been good. Specifically, the Santa Ana P&DC ranked 36th nationally (out of 299) in First-Class Mail⁶ service performance while ranking 8th in total amount of First-Class mailpieces processed from January 1, 2020, to December 31, 2020. Furthermore, during the same timeframe, the Santa Ana P&DC ranked third nationally (out of 324) in Marketing Mail service performance while ranking second in total amount of marketing mailpieces processed (see Table 3).

Table 3. Service Score and Processed Volume Rankings for First-Class and Marketing Mail at the Santa Ana P&DC

Mail Type	Service Score	National Service Score Rank	Processed Volume	National Volume Rank
First-Class Mail	86.5%	36	284,560,916	8
Marketing Mail	97.2%	3	370,277,352	2

Source: Informed Visibility.7

Therefore, Santa Ana management conducted an analysis to determine why delayed inventory was so high. Specifically, management sampled mailpieces

and used the Mail History Tracking System⁸ to track the sampled mailpieces to verify that the mail flowed correctly from operation to operation and met mail processing clearance times. Management also submitted incident request tickets because they believed there were issues with MCV. Despite these efforts, management was unable to fully determine why their facility was reporting such high numbers of delayed mail inventory in MCV.

Specifically, management wasn't fully aware that delayed inventory can occur as a result of using sort plans that do not run the last expected processing operation⁹ and/or bypass mail processing operations. While management generally understood that mail is reported as delayed inventory in the MCV application when mailpieces are not being processed timely, they could not provide us detailed scan information for our scope period (such as the operation where the delay occurred) because it is only available for one operational day. Therefore, we were unable to determine all of the causes for the delayed mail reported in the MCV application.

Sort Plans

The MCV application expects mail to be processed in accordance with a designed mail flow. If a facility does not process mail as expected, the MCV application will categorize the mail as delayed inventory. At the Santa Ana P&DC, management processes mail on operation number 894¹⁰ that receives a first and second pass DPS scan or a carrier route operation scan. However, Santa Ana P&DC management also processes certain mail on operation 894 that bypasses first and second pass DPS operation scans or carrier route operation scans. MCV does not recognize this operation number as being a last processing operation and expects additional operational scans (see Figure 1).

⁵ Stated delivery performance goals for each mail class and product that are usually measured by days for the period of time taken by Postal Service to handle the mail from end-to-end.

⁶ First-Class Mail Composite performance indicator combines the service performance results for Single-Piece First-Class Mail and Presorted First-Class Mail for an aggregate of Overnight, 2-Day, and 3-5-Day service.

⁷ Receives near real-time mail events to include electronic documentation submissions, trailer arrive/depart scans, container load/unload scans, mail processing equipment, and piece, tray, and bundle reporting events.

⁸ An online application that provides diagnostic tracking by individual mailpieces.

⁹ The last expected mail processing operation before delivery of the mailpiece.

¹⁰ This is an incoming primary sort plan.

Figure 1. Mail Flows at the Santa Ana P&DC



Source: Handbook F-95, *Statistical Programs Management Guide*, dated September 2020, and mail flow observed during a U.S. Postal Service Office of Inspector General visit to the Santa Ana P&DC, March 16 - 18, 2021.

Since the Content Identification Numbers¹¹ that are used with operation number 894 are expecting additional operational scans, when those scans don't occur, the mail is reported in the MCV application as delayed inventory for up to five days, which inflates the daily delayed volumes for processing operations.

Clearance Times

While we did not identify any issues with mail not being cleared on-time during our site visit from March 16 – 18, 2021, we were unable to determine if the next expected processing operation scan occurred on-time¹² during our scope period to avoid being reported as delayed inventory in MCV. This was because the detailed delayed inventory data is only available for one operational day. However, from January 1, 2020, to January 31, 2021, the Santa Ana P&DC was clearing its managed mail, on average, 90.6 percent of the time, which was below the 95 percent target. But the Santa Ana P&DC did surpass the 95 percent target for clearing DPS on-time and cleared DPS, on average, 98.4 percent of the time (see Table 4).

Table 4. Clearance Time Performance from January 2020 to January 2021

Metric	Target	National Average	Santa Ana P&DC
Managed Mail Cleared by 15:00	95.0%	88.2%	90.6%
DPS Cleared by 05:00	95.0%	96.8%	98.4%

Source: Service Analysis and Assessment 24-hour Clock Key Indicators Report.

Postal Service Headquarters management expects the division levels to review MCV data for delayed mail during day-to-day operations. When employees do not follow processes, there is greater risk that mail could be delayed, which could adversely affect Postal Service customers, harm the brand, send mailers to competitors, or cause the Postal Service to lose revenue.

^{11 3-}digit numeric codes that convey information about mail class, shape, sort level, and barcode status. Content Identification Numbers are used to direct mail to the next appropriate operation and/or facility.

¹² By 6:59 a.m. for destinating final processing operations and by 6:00 a.m. for all other operations.

Santa Ana P&DC management tried to reconcile the differences between the delayed inventory reported in the MCV application and their physical observations of delayed inventory at the facility. They also completed their own analysis and submitted incident request tickets to identify the causes of delayed inventory. However, management was unable to determine the causes of delayed inventory reported because they did not know how it was calculated in the MCV application.

Since Santa Ana P&DC management was unable to identify causes of delayed inventory reported in the MCV application, they did not rely on the data to measure their performance and make operational decisions. Data integrity becomes an issue when management is unable to rely on MCV data since they cannot accurately determine the actual amount of delayed mail. We will be conducting future audit work to determine the use and purpose of the MCV application and gauge its usefulness to Postal Service management.

Recommendation #1

We recommend the **Southern California Division Director, Processing Operations**, require plant management to follow designed mail flows and use appropriate sort plans to ensure accurate reporting of delayed mail.

Recommendation #2

We recommend the **Southern California Division Director, Processing Operations**, develop a plan to assist plant management with evaluating expected processing operation scans to determine if mail is not processed timely and causing the Mail Condition Visualization application to report the mail as delayed inventory.

Recommendation #3

We recommend the **Southern California Division Director, Processing Operations**, develop a plan to assist plant management with understanding how delayed inventory is calculated and how to analyze the Mail Condition Visualization data to identify causes for delayed inventory.

Management's Comments

Management disagreed with the finding and recommendations in the report.

Regarding recommendation 1, management stated they follow the designed mail flow but when mail arrives late to the facility, it runs through operation number 894 and is dispatched directly to the delivery units to meet service. Management also stated that based on the data in MCV, the greatest opportunity is tied to DPS finalization. However, Santa Ana has one of the best DPS percentages in the nation, demonstrating they are already following the designed mail flow. Therefore, management stated the issue that needs to be addressed is the flawed logic in MCV, which is beyond their scope.

Regarding recommendation 2, management stated the Santa Ana P&DC is well above the national average for compliance with meeting targeted clearance times. Additionally, management stated the delayed totals in MCV are alarming because they represent potential service failures. However, in fiscal year (FY) 2020, Santa Ana finished third in First-Class destinating service and is currently first in the nation for year-to-date service in FY 2021. Therefore, management stated the process exists for proper processing and there is no need for additional activities since Santa Ana is leading the country in service. Management again concluded that the logic in MCV is flawed and runs counter to the results indicated.

Regarding recommendation 3, management stated they are well versed in MCV and how delayed inventory is calculated in MCV. They stated that the issue is a disagreement with the logic MCV is using, and the ability to correct the logic that is causing the errors is well beyond the scope of the division and rests with the analytics group that manages MCV.

See Appendix A for management's comments in their entirety.

Evaluation of Management's Comments

We consider management's comments unresponsive to the recommendations and will not resolve the issues identified in the report.

Regarding recommendation 1, as management stated, Santa Ana P&DC management processes late arriving mail on operation 894 that bypasses first and second pass DPS operation scans or carrier route operation scans. While management does not believe this is an issue, the mail is being reported in the MCV application as delayed inventory because MCV does not recognize this operation number as being a last processing operation and expects additional operational scans.

Regarding recommendation 2, as we stated in our report, the Santa Ana P&DC did surpass the 95 percent target for clearing DPS on-time. However, we were unable to determine if the next expected processing operation scan occurred on-time during our scope period because the detailed delayed inventory data is only available for one operational day. Additionally, while Santa Ana did process mail on-time on most occasions, there were instances when this did not occur and caused the mail to be reported as delayed inventory.

We found these two issues as contributing factors that caused mail to be reported as delayed inventory in the MCV application. Management believes these are not issues since their DPS percentage, clearance times, and service performance are so high. However, from January 1, 2020, to January 31, 2021, the MCV application reported over 2.4 billion pieces of delayed inventory at the Santa Ana P&DC. Management was unable to quantify how much mail was actually delayed versus reported as delayed because of these issues; therefore, we made recommendations 1 and 2.

Regarding recommendation 3, we stated in our report that Santa Ana P&DC management tried to reconcile the delayed inventory reported in the MCV application, completed their own analysis, and submitted incident request tickets to identify the causes of delayed inventory. However, management was unable to determine why there was so much delayed inventory reported in MCV. Management believes the underlying issue is flawed with the logic in MCV that can only be corrected by the headquarters analytics group. This is contrary to information provided by Postal Service leadership during our fieldwork for this audit and previous audits covering delayed mail inventory reported in MCV at other facilities. To close out similar recommendations in previous audits, management has coordinated with Postal Service Headquarters to address the issues.

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. We view the disagreements to recommendations 1, 2, and 3 as unresponsive and plan to pursue them through the formal audit resolution process.

Appendix A: Management's Comments



May 17, 2021

Joseph Wolski Director, Audit Operations

SUBJECT

Delayed Mail at the Santa Ana, CA Processing and Distribution Center (Project Number 21-119)

Joseph

After review of the audit provided by the OIG we have found some inconsistencies in the findings. Our disagreeing position and the supporting data are contained in the responses to each individual recommendation.

Recommendation #1: We recommend the Southern California Division Director, Processing Operations, require plant management to follow designed mail flows and use appropriate sort plans to ensure accurate reporting of delayed mail.

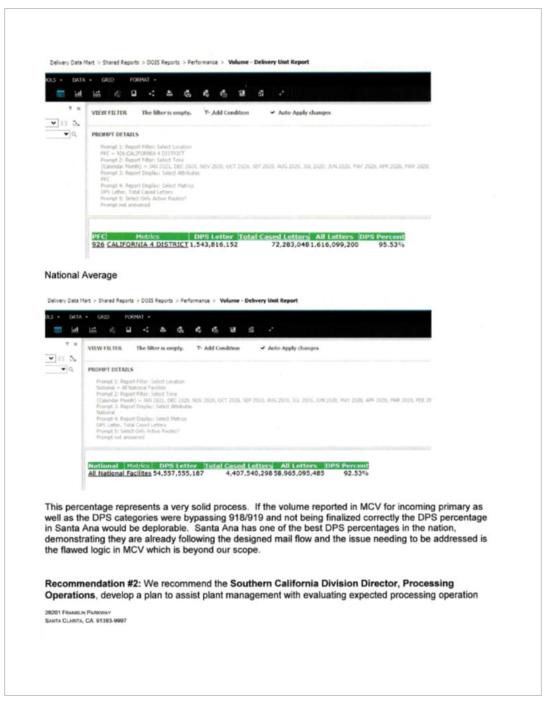
The Santa Ana P&DC does follow the designed mail flow. The 894 primary operation that was identified in the report is the proper flow for mail. The subsequent 918 and 919 operations are also correct. The presumed variance cited in this report is when mail arrives late to the facility due to either operational or logistical error originating from another site. When mail arrives too late to run through 918, 919 or 896 it is processed through 894 and sent to delivery to make service. This scenario rarely happens. The audit shows that MCV has reported nearly 2.5 billion delayed pieces over the measured period. The opportunity by category as presented in the audit demonstrates that the greatest opportunity is tied to flows surrounding DPS finalization. If this MCV data is accurate 2 billion pieces of mail were not finalized in DPS over the measured period.

Table 2. Delayed Mail by Operation at the Santa Ana P&DC

Type of Operation	Processing Operation	Delayed Mail	Percentage to Total Delayed Mail
DPS	First-Class Letter (second pass)	844,706,140	34.5%
DPS	Marketing Letter (second pass)	735,655,991	30.1%
DPS	First-Class Letter (first pass)	448,858,931	18.4%
DPS	Marketing Letter (first pass)	175,124,601	7.2%

The position that the Santa Ana P&DC has an issue with volume bypassing 918/919 is unfounded. For the period used by the OIG for this audit Santa Ana P&DC had a DPS percentage three points above the national average at 95.53%.

Santa Ana District



scans to determine if mail is not processed timely and causing the Mail Condition Visualization application to report the mail as delayed inventory.

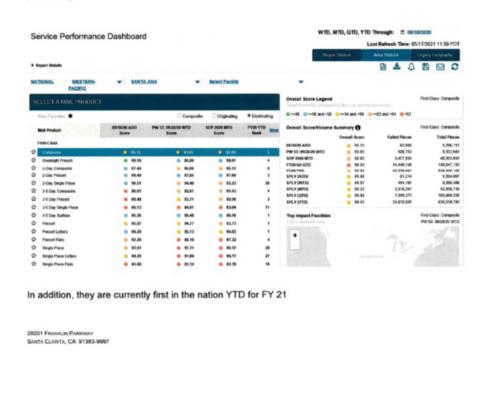
An operating plan already exists accounting for timely processing of mail. The metrics shared by the OIG demonstrate that the Santa Ana P&DC has a process well above the national average for compliance with meeting targeted operating plan goals for avoiding delays and service failures.

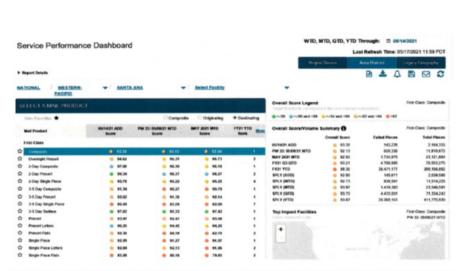
Table 4. Clearance Time Performance from January 2020 to January 2021

Metric	Target	National Average	Santa Ana P&DC
Managed Mail Cleared by 15:00	95.0%	88.2%	90.6%
DPS Cleared by 05:00	95.0%	96.8%	98.4%

Source: Service Analysis and Assessment 24-hour Clock Key Indicators Report.

More importantly than the process indicators are the service indicators. The "delayed" totals in MCV are alarming because what they represent are potential service failures. The Santa Ana group finished FY 20 ranked 3rd out of the 67 districts for FC destinating service. It is important to differentiate the origin and destinating metrics because this report is mainly comprised of failures attributed to incoming/destinating processing.





If the MCV data below were an accurate depiction of the service in Santa Ana the score would be in the 55% range, not above 90%. If the "facilities with most delays" was an accurate assessment these same facilities would have the worst service as well. The Santa Ana group would not be the leader in the country in destinating service.

Table 1. Facilities with the Most Delayed Mail

	Delayed	Processed
Facility Name	Inventory	Volume
North Houston, TX, P&DC	3,948,114,992	6,678,976,727
Phoenix, AZ, P&DC	2,804,953,269	6,651,306,074
Santa Ana, CA, P&DC	2,446,085,327	5,307,846,783
Sacramento, CA, P&DC	2,410,094,935	4,983,886,697
Michigan Metroplex, MI, P&DC	2,301,281,871	4,043,613,609

Source: MCV and Web Management Operating Data System.6

The process is in place for accounting for proper processing, in the proper timeframes or the group would not be able to lead the country in service. There is no need for additional activities by the group in Santa Ana surrounding MCV. Again, the logic in MCV is flawed and runs counter to the results indicators (service, DPS by 0500, etc).

Recommendation #3: We recommend the Southern California Division Director, Processing Operations, develop a plan to assist plant management with understanding how delayed inventory is calculated and how to analyze the Mail Condition Visualization data to identify causes for delayed inventory.

28201 FRANKLIN PARKWAY SANTA CLARITA, CA 91383-9997 The Santa Ana group is well versed in MCV. They spent hours with the OIG group walking them through tickets and emails they have submitted surrounding these variances. They walked the OIG through the CSV file. They fully understand how delayed inventory is calculated in MCV. The issue is a disagreement with the logic the system is using. There is no way for the group to reconcile that. The ability to correct the logic that is causing the false errors is well beyond the scope of the district or division. The issue will have to be resolved by the analytics group who designed and manages MCV. The group has a demonstrated strong operating plan. The group has a solid process for handling mail flows. The group is the leader in national service. All these positions are supported by data and have been included. As a result, management disagrees that the MCV issues addressed in this report can be resolved at the district level or will be improved by the recommendations.

Britton D Soto

Senior Division Director Processing Operations Southern California Division

28201 FRANKLIN PARKWAY SANTA CLARITA, CA 91383-9997

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