

Office of Inspector General | United States Postal Service

# **Audit Report**

# Unscheduled Leave - Absence Without Leave (AWOL) Status

Report Number 21-140-R22 | January 7, 2022



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# **Highlights**

# **Objective**

Our objective was to assess the management of U.S. Postal Service employees in absence without leave (AWOL) status to identify opportunities to timely address employees in AWOL status and manage cost.

In March 2020, the president declared COVID-19 to be a national emergency and signed the Families First Coronavirus Response Act into law. Following that act's expiration, the American Rescue Plan Act was signed into law in March 2021. Both acts allowed eligible federal employees to take additional emergency paid sick and family leave.

Given the new laws, the Postal Service worked with its unions to implement a liberal leave policy to temporarily expand employee leave options. To use emergency and liberal leave, employees were required to provide documentation validating their absence.

"For unscheduled absences, the employee must notify the supervisor or proper official as soon as the employee realizes he or she will be unable to report for duty."

Unscheduled leave is any absence from work that is not requested and approved in advance. For unscheduled absences, the employee must notify the supervisor or proper official as soon as the employee realizes he or she will be unable to report for duty. Immediately upon returning to duty, the employee must submit a Postal Service (PS) Form 3971, Request for or Notification of Absence, and explain the reason for the unscheduled leave.

AWOL is a non-pay status resulting from a determination that no type of leave — including leave without pay (LWOP) — can be granted, either because the employee did not obtain advance authorization for the absence or the request for leave was denied. AWOL absences may be used as the basis for disciplinary action. Further, the Postal Service cannot replace an

AWOL employee's position until they are officially terminated and removed from the payroll.

We analyzed employees in AWOL status nationwide from fiscal years 2018 through 2020. We did not include scheduled leave or other unscheduled leave other than AWOL in our analysis. We focused on AWOL hours because when employees are AWOL their job responsibilities still need to be completed, at times by paying others overtime. In addition, AWOL employees are eligible to receive health benefits unless the employee is removed or reaches 365 days in LWOP status and is eligible for the termination of coverage. To accomplish our objective, we conducted visits at 24 judgmentally selected sites in the Atlantic and Central areas.

# **Findings**

While we understand the challenges the Postal Service faced during the pandemic, we identified two areas of improvement for the Postal Service to timely address employees in AWOL status and manage cost.

First, opportunities exist for Postal Service facility managers and supervisors to improve their management of AWOL employees. Specifically, they did not always properly record AWOL hours, used different guidance to execute progressive discipline, and did not always collect or maintain supporting documentation for employees on AWOL.

- Nineteen of 24 (79 percent) facility managers and supervisors in four different districts initially categorized employees' unscheduled leave hours as "AWOL." The remaining five (21 percent) categorized employees' unscheduled leave hours as "LWOP." While managers and supervisors often referred to policy on leave control, the guidance was conflicting and led to inconsistent interpretation.
- District offices developed their own processes and template letters based on disciplinary guidance and union agreements to address AWOL employees' behavior because there was no standardized guidance for how to discipline extended AWOL employees. District Human Resources personnel instructed supervisors to follow these processes and use the templates on their district

websites to execute disciplinary actions for AWOL employees. However, supervisors did not always follow the guidance because they were unfamiliar with those processes and templates. Establishing standardized guidance would promote consistency and allow the AWOL discipline process to be handled more efficiently.

 Supervisors did not always collect or maintain supporting documentation for AWOL employees because they were not adequately trained on managing and documenting disciplinary actions for AWOL employees.

By not improving its management of AWOL employees, the Postal Service risks making procedural errors and wasting resources when trying to prepare and issue discipline letters to correct employee behavior. In addition, during the interviews conducted, management stated they were often prevented from issuing the disciplinary action.

We estimated the Postal Service paid nearly \$3.8 million annually in health benefit premiums for employees who remained on extended AWOL status (longer than 60 calendar days).

Second, management did not always include all AWOL employees' disciplinary and health benefit documentation in their electronic official personnel folders. Specifically, we determined that 178 of 195 sampled employees (91 percent) on extended AWOL did not have all disciplinary actions or health benefit documentation included in their electronic official personnel folder. Although the Postal Service has criteria detailing which disciplinary and health benefit documents should be maintained in an employee's official personnel folder, management retained some documentation in hard copy form in the district or local offices instead of in the employee's electronic official personnel folder. Additionally, Postal Service personnel did not always verify whether all appropriate AWOL employees' disciplinary and health benefit documentation was uploaded in the electronic official personnel folder.

Further, management did not incorporate a timeline of administrative actions for 73 of 195 sampled AWOL employees (37 percent) after taking disciplinary action.

The Postal Service did not have specific policy on detailing what administrative actions should be recorded in eRMS.

When employee administrative actions and health benefit documents are not properly maintained, future disciplinary actions or health benefit enrollment and termination can be delayed. Additionally, when management does not document employee administrative actions, they may not be able to provide support to Labor Relations and union officials when administrative actions are issued.

## Recommendations

We recommended management:

- Update policy to clarify how to appropriately record leave for AWOL employees and distribute it to all supervisors and managers to ensure consistent application.
- Review disciplinary guidance and templates on district websites to ensure consistency and, as appropriate, update and communicate guidance.
- Provide regularly updated eRMS and discipline training for managers and supervisors to facilitate management of AWOL employees.
- Reiterate to management their responsibility to complete, timely review, and maintain AWOL employee attendance documentation.
- Clarify and communicate where AWOL employees' disciplinary and health benefit documents should be maintained.
- Develop a process to verify all appropriate AWOL employees' disciplinary and health benefits documentation are timely reviewed and uploaded when sent to their electronic official personnel folder.
- Review and update guidance on the HRSSC's website to ensure appropriate documentation is included in an employee's electronic official personnel folder.
- Establish policy to define how to properly record administrative actions in eRMS.

# Transmittal Letter



January 7, 2022

MEMORANDUM FOR: DR. JOSHUA D. COLIN

CHIEF RETAIL & DELIVERY OFFICER AND EXECUTIVE

VICE PRESIDENT

ISAAC S. CRONKHITE

CHIEF LOGISTICS & PROCESSING OPERATIONS OFFICER AND EXECUTIVE VICE PRESIDENT

SIMON M. STOREY

VICE PRESIDENT, HUMAN RESOURCES

KATHERINE S. ATTRIDGE

VICE PRESIDENT, LABOR RELATIONS

FROM: Jason M. Yovich

Deputy Assistant Inspector General

for Supply Management and Human Resources

**SUBJECT:** Audit Report – Unscheduled Leave – Absence Without Leave

(AWOL) Status (Report Number 21-140-R22)

This report presents the results of our audit of Unscheduled Leave – Absence Without Leave (AWOL) Status.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact John Cihota, Director, Human Resources & Support, or me at 703-248-2100.

Attachment

cc: Postmaster General

Corporate Audit Response Management

# Results

# Introduction/Objective

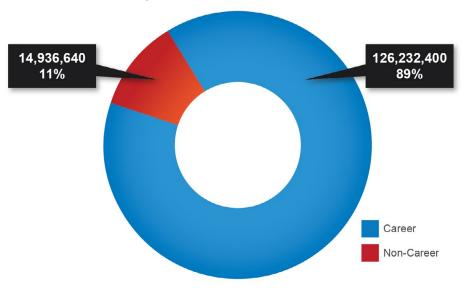
This report presents the results of our self-initiated audit of Unscheduled Leave – Absence Without Leave (AWOL) Status (Project Number 21-140). Our objective was to assess the management of U.S. Postal Service employees in AWOL status to identify opportunities to timely address AWOL status and manage costs. See Appendix A for additional information about this audit.

# **Background**

Unscheduled leave is any leave from work that is not requested and approved in advance. Employees request scheduled absences in writing using Postal Service (PS) Form 3971, Request for or Notification of Absence. Alternatively, employees can call into the Interactive Voice Response System to request unscheduled leave. If using this method, employees are required to enter their employee identification number and are instructed to specify the type of illness and the amount of expected missed time. For unscheduled absences, the supervisor or proper official must be notified as soon as the employee realizes he or she is unable to report for duty. Immediately upon returning to duty, the employee must submit a PS Form 3971 and explain the reason for the unscheduled leave.

As of September 30, 2020, the Postal Service employed about 644,000 people, including 495,941 (77 percent) career and 148,092 (23 percent) non-career employees nationwide. From fiscal years (FY) 2018 through 2020, career employees used 89 percent of unscheduled leave hours, as shown in Figure 1.

Figure 1. FYs 2018 – 2020 Unscheduled Leave Hours Usage – Career vs. Non-Career Employees



Source: U.S. Postal Service Office of Inspector General (OIG) analysis.

AWOL is a non-pay status resulting from a determination that no kind of leave — including leave without pay (LWOP)¹ — can be granted, either because the employee did not obtain advance authorization for the absence or the employee's request for leave was denied. Any employee can be charged with AWOL. An employee who is absent without permission or fails to provide satisfactory evidence that an actual emergency existed is placed in a non-pay status for the period of the absence. An AWOL absence may also be used as the basis for disciplinary action. Employees who are AWOL are still counted against the facility's employee complement, and the Postal Service cannot replace AWOL employees until they are officially terminated and removed from the payroll.

<sup>1</sup> An authorized absence from duty in a non-pay status.

# **Pandemic Challenges of COVID-19**

In March 2020, the president declared COVID-19 a national emergency and signed the Families First Coronavirus Response Act into law. Following that act's expiration, the American Rescue Plan Act was signed into law in March 2021. Both acts allowed eligible federal employees to take additional emergency paid sick and family leave.

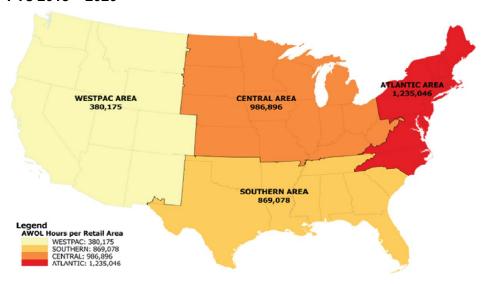
Given the new laws, the Postal Service worked with its unions to implement a liberal leave policy to temporarily expand leave options for employees. To

"We identified 78,677 career and non-career employees who had about 5.9 million AWOL hours by operations from FYs 2018 through 2020." use emergency or liberal leave, employees were required to provide documentation validating their absence. However, many employees could not or did not provide sufficient supporting justification for those types of leave<sup>2</sup> and, as a result, were placed in AWOL status for their absences.

In FY 2020, the Postal Service reorganized its field structure to classify its Retail and Delivery network into 50 districts, its Processing Operations into two regions (Eastern and Western), and its Logistics Operations into four regions. We identified 78,677 career and non-career employees who had about 5.9 million AWOL hours<sup>3</sup> by operations<sup>4</sup> from FYs 2018 through 2020.

Retail and Delivery accounted for the most AWOL hours, with about 3.5 million hours (59 percent). As shown in Figure 2, the Atlantic Area accounted for the most AWOL hours within Retail and Delivery, with about 1.2 million hours (36 percent).

Figure 2. Retail and Delivery Operations<sup>6</sup> AWOL Hours During FYs 2018 – 2020



Source: OIG analysis of Enterprise Resource Management System (eRMS)7 data.

Processing Operations accounted for about 2.4 million AWOL hours (40 percent)<sup>8</sup> for both regions during FYs 2018 through 2020. As shown in Figure 3, the Eastern Region accounted for the most AWOL hours in Processing Operations, with about 1.5 million hours (63 percent).

<sup>2</sup> COVID-19 Leave Administration (Report No. 21-032-R21, dated June 16, 2021).

<sup>3</sup> We excluded headquarters (HQ) hours, which accounted for 196,994 AWOL hours.

<sup>4</sup> Includes Retail and Delivery, Processing Operations, and Logistics Operations.

<sup>5</sup> This includes 51,321 career and non-career employees who had AWOL hours within Retail and Delivery.

<sup>6</sup> AK and HI are in the WestPac Area and Puerto Rico is in the Southern Area.

<sup>7</sup> A system that provides a consistent and standardized approach to handle incoming calls for unscheduled absences and to assist in managing scheduled and unscheduled absences. eRMS provides real time data and report management functions to supervisors.

<sup>8</sup> This includes 27,211 career and non-career employees who had AWOL hours within Processing Operations.

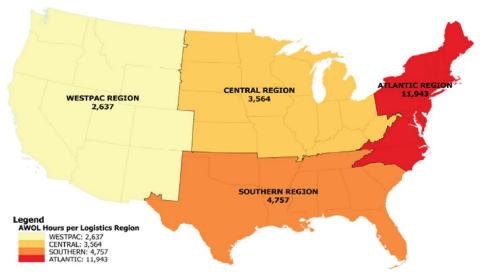
Figure 3. Processing Operations<sup>9</sup> AWOL Hours During FYs 2018 – 2020



Source: OIG analysis of eRMS data.

Logistics Operations accounted for the fewest AWOL hours, given the limited number of facilities and personnel within these operations, with about 23,000 hours (0.4 percent). As shown in Figure 4, the Atlantic Region accounted for the most AWOL hours, with about 12,000 hours (52 percent).

Figure 4. Logistics Operations<sup>11</sup> AWOL Hours During FYs 2018 – 2020



Source: OIG analysis of eRMS data.

# **Site Analysis**

From the data provided by the Postal Service for AWOL leave hours in eRMS and areas and district/divisions complement data<sup>12</sup> for FYs 2018 through 2020, the team judgmentally selected the Atlantic and Central areas due to the high number of AWOL hours per person (6.3 hours and 5.0 hours, respectively). The audit team then visited selected districts with the two highest and two lowest number of AWOL hours per person in those areas to conduct visits at 24 judgmentally selected sites.

<sup>9</sup> AK and HI are in the Western Region and Puerto Rico is in the Eastern Region.

<sup>10</sup> This includes 145 career and non-career employees who had AWOL hours within Logistics Operations.

<sup>11</sup> AK and HI are in the WestPac Region and Puerto Rico is in the Southern Region.

<sup>12</sup> We obtained the number of employees on payroll at the end of September 2018, 2019, and 2020.

# Finding #1: Inconsistent Management of AWOL Employees

Opportunities exist for Postal Service facility managers and supervisors to improve management of AWOL employees. Specifically, while the Postal Service has criteria for managing AWOL employees, managers and supervisors did not always properly record AWOL hours, used different guidance to execute progressive discipline, and did not always collect or maintain supporting documentation for employees on AWOL.

# **Recording AWOL Hours**

Facility managers and supervisors responsible for recording unscheduled leave hours did not initially record the appropriate type of leave in eRMS for AWOL employees. Nineteen of 24 (79 percent) facility managers and supervisors in four different judgmentally selected districts initially categorized employees' unscheduled leave hours as "AWOL" before receiving the facts of the circumstances or sufficient documentation to support the absence. The remaining five (21 percent) categorized employees' unscheduled leave hours as "LWOP" and waited until the end of the week before changing the leave status to AWOL, if appropriate.

An employee who does not call their supervisor advising of an unscheduled absence is considered AWOL until they provide documentation proving otherwise. However, policy states that the pending AWOL charge should not be entered on the timecard at this time but only after the facts have been received.<sup>13</sup> In addition, policy states that an absence that is disapproved is charged as LWOP<sup>14</sup>; however, additional guidance states that disapproved absences will be charged as AWOL.<sup>15</sup>

While managers and supervisors responsible for recording AWOL employees' leave often referred to policy on leave control, the guidance was conflicting and led to inconsistent interpretation. For example, supervisors at one location

were told by prior managers to immediately mark employees as AWOL for any unauthorized absence. When a new manager arrived, they emphasized giving employees time to provide documentation before listing their absence as AWOL.

Management must ensure they follow proper procedures before coding employees as AWOL. AWOL is an administrative matter and, if time is not allotted for employees to provide documentation or respond before being charged as AWOL, management may be unable to support their disciplinary decisions due to procedural errors if discipline is grieved. This could prevent discipline from being successfully issued or even lessen the requested discipline. Conversely, not coding absences appropriately as AWOL and leaving those absences as LWOP in the system prevents management from providing additional oversight or addressing those instances at all.

"While managers and supervisors responsible for recording AWOL employees' leave often referred to policy on leave control, the guidance was conflicting and led to inconsistent interpretation."

<sup>13</sup> Handbook F-21, Time and Attendance, Section 142, Attendance Rules and Assignment Control, dated February 2016. All references to timecards in this section are also applicable to automated timekeeping systems.

<sup>14</sup> Employee and Labor Relations Manual (ELM 51), Section 513.64, Absent Without Leave, dated September 2021.

# **Applying Progressive Discipline**

Supervisors are responsible for starting the disciplinary process and following the necessary steps. District offices developed their own processes and template letters based on disciplinary guidance and union agreements to address AWOL employees' behavior because there was no standardized guidance for how to discipline AWOL employees on extended AWOL, leading to districts using different disciplinary processes to discipline them. District Human Resources personnel instructed supervisors to follow processes and use the templates<sup>16</sup> on their district websites to execute disciplinary actions for AWOL employees. For example, Table 1 shows the difference in the processes used by two districts in their disciplinary actions for AWOL employees.

Table 1. Example of Differences in District's Disciplinary Process

Action	District 1	District 2
5-Day Notice Letters <sup>17</sup>	✓	
AWOL 1 Letters <sup>18</sup>		✓
AWOL 2 Letters		✓
Letter of Warning (LOW)	✓	✓
Pre-Disciplinary Interviews <sup>19</sup>	✓	✓
7-Day Suspension	✓	✓
14-Day Suspensions	✓	✓
Notice of Removal	✓	✓

Source: Postal Service district personnel interviews.

The main purpose of any disciplinary action is to correct undesirable behavior on the part of an employee. According to policy, management should have a discussion with the employee before issuing discipline for minor offenses<sup>20</sup> to correct the behavior. These discussions are not considered discipline and are not investigative but, rather, they put an employee on notice concerning his or her behavior. If discussions do not correct the behavior of an employee, management should apply the first step of the progressive discipline process. Although the standard progressive discipline process is outlined in the policy, grievances can delay the disciplinary process or cause the process to start over. Grievances can only occur at certain steps in the disciplinary process, denoted with the letter "G" in Figure 5 where it applies. See Figure 5<sup>21</sup> for the general disciplinary process flowchart for unscheduled leave as explained by the Postal Service.

<sup>16</sup> Templates for various disciplinary letters and details on how to properly fill them out can be found on district websites. This includes templates for LOWs, PDIs, and suspensions.

<sup>17</sup> This step is not included in the guidance for the disciplinary process.

<sup>18</sup> AWOL 1 and AWOL 2 letters are not included in the guidance for the disciplinary process.

<sup>19</sup> This step is not included in the guidance for the disciplinary process.

<sup>20</sup> Minor offenses include safety, schedule, work quality, rule, and regulation violations.

<sup>21</sup> Management cannot issue multiple levels of discipline for an infraction. Current policy requires they use a progressive disciplinary process to correct undesirable employee behavior.

Employee If responsive, informal, non-disciplinary conversation Did the employee return commits a no to work and provide with employee upon return No further call, no show necessary documentation discipline might be on a scheduled Non-responsive, conduct wellness check and if the or explanation for their needed day of work employee does not return proceed with progressive path absence? Issue a letter of availability/return Did the employee return to work No further discipline to work to the employee stating and provide documentation or an might be their responsibility to report to duty explanation for their absence? NO needed Have a Pre-Disciplinary Interview Did the employee appear = No further (PDI) to determine cause of at the PDI and turn in discipline might be absences and collect documentation documentation? NO needed Issue a letter of warning to No further Did the employee provide discipline the employee stating that documentation? might be the offense is unacceptable NO needed Issue a 7-day suspension to the No further Is the employee in compliance with employee. Continue to require discipline management's requests yet? might be paperwork and regular attendance NO needed Issue a 14-day suspension to the Has the employee provided the necessary No further discipline employee. Continue to require paperwork for all absences and had might be paperwork and regular attendance regular attendance? NO needed Contact Labor Relations to issue a Notice of Mail the Notice of Removal to the Removal and provide supporting documentation employee's address on file

Figure 5. General Disciplinary Process Flowchart<sup>22</sup>

Source: Postal Service Handbook EL-921, Supervisor's Guide to Handling Grievances, dated April 2015 and OIG analysis through district interviews.

<sup>22</sup> This is a general outline of the disciplinary process for unscheduled leave. Discipline is issued based on the specifics of each case.

In addition, although district offices developed their own disciplinary guidance for AWOL employees, supervisors did not always follow the guidance. For example, one manager explained instances where Labor Relations rescinded discipline issued to employees due to supervisors not following the appropriate discipline process for AWOL employees, as outlined by their district Labor Relations offices.

During any disciplinary grievance, it is imperative that supervisors have a complete understanding of the discipline process.<sup>23</sup> According to policy, a letter of warning is the first step in the progressive disciplinary process, as shown in

"While we recognize each instance of AWOL is handled on a case-by-case basis, establishing standardized guidance would promote consistency and allow the AWOL discipline process to be handled more efficiently."

Figure 5. Management should use progressive discipline, up to and including removal, to correct employee behavior. The level of discipline issued would depend on the severity of the infraction and the employee's disciplinary history. Additionally, policy provides offenses<sup>24</sup> that may warrant removal without prior progressive discipline.

Although the Postal Service has guidance for progressive discipline, there is no standardized guidance that outlines discipline specifically for AWOL employees.

Although each AWOL circumstance is unique, standardization implemented well can decrease ambiguity, guarantee quality, boost productivity, and increase employee morale. In addition, supervisors were unfamiliar with disciplinary process and templates and did not always reach out to Labor Relations for guidance for disciplining AWOL employees.

Without standardized guidance that outlines progressive discipline for AWOL employees specifically, there is no way to determine if the nature of discipline is corrective or punitive and if the level of discipline is consistently issued for similar AWOL offenses. While we recognize each instance of AWOL is handled on a case-by-case basis, establishing standardized guidance would promote consistency and allow the AWOL discipline process to be handled more efficiently. Additionally, when supervisors do not follow the disciplinary process, cases can be difficult to defend in arbitration, especially when a removal is warranted.

Although the Postal Service Human Resources reporting structure was updated with a recent reorganization, each district handles discipline differently at the local level. This can cause confusion and affects all employees, especially when there are differences within each district. Lastly, this can cause each manager and supervisor to conduct discipline differently, which can lead to making procedural errors and wasting resources when trying to correct employee behavior.

# **Maintaining Supporting Documentation**

Supervisors did not always collect or maintain supporting documentation for AWOL employees. We found that 11 of 24 supervisors interviewed (46 percent) stated that missing or incomplete supporting documentation was an issue.

Policy states that the supervisor is responsible for identifying the timecards of employees who do not clock in and removing those timecards. The supervisor must generate and sign a PS Form 3971 for employees who do not call in an unscheduled absence before or after their scheduled start time. The PS Form 3971 is used as supporting documentation for all absences and must be kept in a secure location to prevent loss, destruction, or unauthorized use. The forms should be maintained in a pending file during the employee's absence.<sup>25</sup>

Supporting documentation was not always collected or maintained because supervisors were not adequately trained on managing and documenting disciplinary actions for AWOL employees. Specifically, 10 of 24 managers and supervisors interviewed (42 percent) stated that there was either no training

<sup>23</sup> Handbook EL-921, Discipline.

<sup>24</sup> Offenses include acts of violence, theft, or intoxication (drugs or alcohol).

<sup>25</sup> Handbook F-21, Section 142, Attendance Rules and Assignment Control.

on managing and documenting disciplinary actions for AWOL employees, or that they would benefit from more training on these issues. We determined that 19 of 24 (79 percent) facility managers participated in training in three areas (attendance, discipline, and eRMS) related to employee leave and included management of AWOL employees; however, 33 of the 61 training courses (54 percent) were completed in FY 2018. When we evaluated the training available, we found that there was very general guidance related to disciplinary action, specifically for AWOL employees.

Missing or incomplete supporting documentation could prevent management from moving forward with discipline for the AWOL employees. For example, management stated that obtaining medical documentation from employees was a challenge and delayed medical documentation, often presented and accepted later in the disciplinary process, prevented them from successfully or timely issuing discipline. Additionally, management stated that the discipline process stops if there is an incomplete PS Form 3971. District personnel believe that clear and consistent communication surrounding AWOL may resolve some of the issues. AWOL employees are counted against the facility's and district's

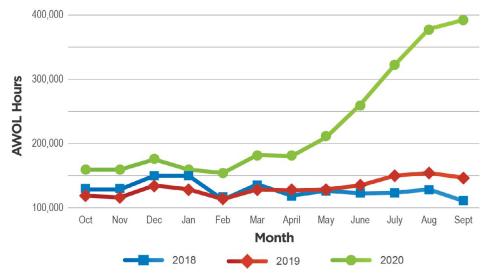
"District personnel believe that clear and consistent communication surrounding AWOL may resolve some of the issues."

employee complement, and the Postal Service cannot replace the AWOL employee's position until they are removed from the payroll. Lastly, AWOL employees can affect a facility's overtime hours and employee morale and create additional work for employees who are not absent, which could lead to health and safety issues.

COVID-19 and the use of liberal leave had a significant effect on the total number of AWOL hours during FY 2020 because employees who did not validate their absences with appropriate supporting documentation were put in AWOL status. As illustrated in Figure 6, in September 2020 there were 392,367 AWOL

hours, compared to September 2019 when there were only 147,086 AWOL hours. AWOL hours continued increasing into FY 2021, reaching nearly 500,000 AWOL hours by December 31, 2020.

Figure 6. AWOL Hours During FYs 2018 - 2020<sup>26</sup>



Source: OIG analysis of eRMS data.

We compared nationwide data from FYs 2018 through 2020 for AWOL hours to national service performance, <sup>27</sup> overtime, and penalty overtime by performing a correlation coefficient <sup>28</sup> analysis. A positive correlation suggests that as the number of AWOL hours increased, the specific metrics would increase as well. Similarly, a negative correlation would indicate that as the number of AWOL hours increases, the metrics would decrease.

Based on the analysis, there was a strong, negative correlation between AWOL hours and service performance, meaning that as AWOL hours increased, service performance decreased. Further, there was a strong, positive correlation between AWOL hours, overtime, and penalty overtime, meaning that as AWOL hours

<sup>26</sup> AWOL hours for Retail and Delivery, Processing, and Logistics functions. This does not include AWOL hours at HQ.

<sup>27</sup> Service performance can also be affected by increased associated costs with processing, transporting, and delivering mail.

<sup>28</sup> The correlation coefficient is used to measure the strength between two variables. The correlation coefficient takes on values ranging between +1 and – 1. A zero-correlation coefficient indicates no linear relationship.

increased, overtime and penalty overtime increased as well. See Table 2 for AWOL hours compared to the three metrics during FYs 2018 through 2020.

Table 2. Nationwide AWOL Hours Correlation During FYs 2018 – 2020

Fiscal Year	National Service Performance	Overtime	Penalty Overtime	AWOL Hours	Correlation	Relationship
2018	94.4	104,948,106	9,363,938	1,546,574	-0.99	Strong, Negative
2019	94	105,316,422	11,203,313	1,580,696	0.99	Strong, Positive
2020	88.2	111,343,069	16,911,286	2,738,454	0.97	Strong, Positive

Source: OIG analysis.

Additionally, the Postal Service provides career employees in AWOL status with health benefits through the Federal Employees Health Benefits (FEHB) Program.<sup>29</sup> Eagan, MN, Accounting Services is responsible for monitoring health benefit payments. After an employee is in a non-pay status for 365 days, Accounting Services is responsible for terminating coverage. Health benefits are also terminated when an employee is removed from the Postal Service, however

the Postal Service is required to continue paying health benefits until termination. As stated by HQ personnel, if the progressive discipline process is done correctly, it should only take about a month to remove an AWOL employee.

We considered employees who were on AWOL status for more than 40 consecutive working days (60 calendar days) as excessive.<sup>30</sup> Through our sample analysis, we

"Health benefits are also terminated when an employee is removed from the Postal Service, however the Postal Service is required to continue paying health benefits until termination."

determined that 83<sup>31</sup> of 195 (43 percent) extended AWOL<sup>32</sup> employees exceeded the 40 working days threshold and received health benefits during the scope of our audit. Missing documentation prevented the Postal Service, in some cases, from moving forward with disciplinary action on AWOL employees or removing extended AWOL employees timely. As a result, we estimated the Postal Service paid \$11,439,913<sup>33</sup> in health benefit premiums during FYs 2018 through 2020 for employees who remained on extended AWOL status.<sup>34</sup>

The OIG has conducted a series of unscheduled leave audits in the past and found similar issues with the management of unscheduled leave. Therefore, prior recommendations, 35 such as emphasizing eRMS training for managers and supervisors, would be applicable for this audit.

<sup>29</sup> The FEHB Program is group coverage available to employees, retirees and their eligible family members. All career employees are eligible to enroll in FEHB. Non-career employees are eligible if they meet certain eligibility requirements.

<sup>30</sup> Since Postal Service HQ personnel informed us that the progressive discipline process should only take one month, we judgmentally determined that 60 calendar days (providing an additional month) would be a conservative amount of time for any errors identified.

<sup>31</sup> We determined that 133 of 195 (68 percent) employees exceeded the 40 working day threshold. Of the 133, three employees were removed from the sample because they were still terminated within a year, despite not being terminated within the 40 consecutive working days threshold. We determined that 83 of the 130 employees on extended AWOL received health benefits within our scope.

<sup>32</sup> We defined "extended AWOL" as all employees over a month who have been on continuous AWOL status.

<sup>33</sup> Unsupported questioned costs – a subset of questioned costs that are called into question because of missing or incomplete documentation, or because of failure to follow required procedures.

<sup>34</sup> The Postal Service estimated the average annual cost per employee for the FEHB program was about \$10,874.

<sup>35</sup> See Appendix A for prior audit coverage.

## **Recommendation #1**

We recommend the **Vice President, Human Resources**, update policy to clarify how to appropriately record leave entries on absent without leave employees' timecards and in the Enterprise Resource Management System and, in conjunction with the **Chief Retail & Delivery Officer** and **Chief Logistics & Processing Operations Officer**, distribute to all supervisors and managers to ensure consistent application.

#### Recommendation #2

We recommend the **Vice President, Labor Relations**, in conjunction with the **Vice President Human Resources**, review disciplinary guidance and templates related to absence without leave employees on each district's website to ensure consistency and, as appropriate, update and communicate guidance.

## Recommendation #3

We recommend the **Vice President, Human Resources**, provide regularly updated Enterprise Resource Management System and discipline training for managers and supervisors to facilitate management of absence without leave employees.

## Recommendation #4

We recommend the **Chief Retail & Delivery Officer**, in conjunction with the **Chief Logistics & Processing Operations Officer**, reiterate management responsibilities to ensure managers and supervisors complete, timely review, and maintain absence without leave employee attendance reviews; Postal Service (PS) Form 3971, Request for or Notification of Absence; PS Form 3972, Absence Analysis; and other required supporting documentation.

# Finding #2: Inadequate Systems Oversight for Documentation

Management could improve their processes for ensuring employee administrative actions and health benefit documentation is incorporated into the employee's official personnel folder (eOPF or OPF)<sup>36</sup> and that administration actions are listed in eRMS' *Administrative Action Summary*<sup>37</sup> after disciplinary action is taken.

## Management of the eOPF

Postal Service facility management and supervisors did not always upload employees' disciplinary and health benefit documentation into the employee's eOPF. District Labor Relations offices help ensure documentation is correct and all procedures are followed for consistency. Any discipline the manager or supervisor issues should be sent to Labor Relations, who then forwards documentation to the Human Resources Shared Service Center (HRSSC)<sup>38</sup> for inclusion in an employee's eOPF.

We randomly sampled 195 employees on extended AWOL and reviewed whether their AWOL was documented in eOPF and eRMS. We determined that 178 of 195 sampled employees (91 percent) on extended AWOL either did not have all disciplinary actions documented or health benefit documentation included in their eOPF. Specifically, 152<sup>39</sup> of 195 sampled employees (78 percent) on extended AWOL did not have discipline documented in their eOPF. While hard copies of discipline and adverse actions

"Postal Service facility
management and
supervisors did
not always upload
employees' disciplinary
and health benefit
documentation into the
employee's eOPF."

<sup>36</sup> The digitalized recreation of an employee's hard copy OPF, which is currently the official record of an employee's federal career.

<sup>37</sup> The location of the employee's supervisor records attendance-related actions, such as review of attendance, accommodations, restricted sick leave, LOWs, and suspensions.

<sup>38</sup> The HRRSC is the central processing center for hiring activities at the Postal Service.

<sup>39</sup> Of the 152 sampled employees, 83 (55 percent) had AWOL hours in FY 2020, 32 (21 percent) had AWOL hours in FY 2019, and 37 (24 percent) had AWOL hours in FY 2018.

are maintained locally, district Labor Relations personnel stated eOPF was the main system of record used to electronically house copies. Additionally, 129 of 195 sampled employees (66 percent) on extended AWOL did not have a PS Form 3111, FEHB Coverage or Termination While in LWOP Status, documented in eOPF. Employees who do not complete the PS Form 3111 to terminate coverage, once issued, would continue to receive FEHB coverage until reaching 365 days in LWOP status.

As stated on the HRSSC homepage for eOPF and through interviews with HRSSC personnel, all health benefit and disciplinary documents should be in an employee's eOPF. The policy<sup>40</sup> states that originals or copies of discipline or adverse actions are maintained for up to two years. After two years or less if specified in the decision, the employee may request the disciplinary record be purged from the OPF or eOPF provided no subsequent discipline was issued.

"The Postal Service has conflicting criteria detailing which disciplinary and health benefit documents should be maintained in employee's eOPF and locally by Labor Relations."

Conversely, the policy states reference copies of all discipline or adverse actions may not be maintained in the employee's OPF or eOPF but must be maintained in a separate file by Labor Relations. In addition, the U.S. Office of Personnel Management (OPM)<sup>41</sup> provides guidance on documentation to include in employees' eOPF. HRSSC's guidance, which complies with OPM, states that the eOPF should include any discipline documents received from labor, all health benefits correspondence, and hiring documentation. These documents remain in the employee's eOPF until they retire, at which point the files are then sent to OPM.

The Postal Service has conflicting criteria detailing which disciplinary and health benefit

documents should be maintained in employee's eOPF and locally by Labor Relations. Additionally, Labor Relations and local services did not always verify if all appropriate documentation was uploaded in the eOPF. Lastly, Labor Relations personnel and local services<sup>42</sup> only have the ability to remove documentation from the eOPF with the proper completed form request and reasoning. Therefore, inclusion of discipline and health benefit documentation would only occur if Labor Relations or local services forwards or notifies HRSSC of additional documentation.

As a result of employee administrative actions and health benefit documents not being properly maintained in eOPF, future disciplinary actions or health benefit enrollment and termination can be delayed. This may also cause inconsistencies if the employee is transferred to a different facility. A gap in or total lack of disciplinary history could result in discipline being dismissed and the discipline process restarting. No health benefit documentation could also mean the employee's enrollment is not up-to-date and there could be acquired or unknown debt for an employee who did not know they were enrolled and still required to pay their health benefit premiums.

Further, as noted in Finding 1, we estimated the Postal Service paid about \$11.4 million in health benefit premiums during FYs 2018 through 2020 by continuing to pay employees' premiums while they remained in extended AWOL status. Lastly, the Postal Service would fail to comply with OPM and federally mandated Human Resources employee record management regulations.

# Management of eRMS, Administrative Action Summary

We found that Postal Service facility management did not ensure administrative actions were included in eRMS' *Administrative Action Summary* once disciplinary action was taken. Using a random sample of 195 employees on extended AWOL, we determined that 73 of 195 sampled AWOL employees (37 percent) did not have administrative actions included in eRMS' *Administrative Action Summary* after disciplinary actions were taken. In addition, we compared discipline in both eOPF and eRMS to determine if documentation was consistent. We found that

<sup>40</sup> Handbook AS-353, Guide to Privacy, the Freedom of Information Act, and Records Management, Section C.

<sup>41</sup> OPM serves as the chief Human Resources agency and personnel policy manager for the federal government.

<sup>42</sup> District HR offices that support and coordinate personnel activities.

"There was no specific policy on what administrative actions should be recorded in eRMS' Administrative Action Summary section."

174 of 183<sup>43</sup> sampled employees (95 percent) did not have the same disciplinary documentation in both eOPF and eRMS. In both circumstances, because of the missing or inconsistent documentation, we could not validate what, if any, discipline was taken on these AWOL employees.

According to the AWOL process in eRMS, if employees reach a

pre-determined threshold<sup>44</sup> of unscheduled leave occurrences, the eRMS system notifies management that an attendance review may be warranted. Findings are then entered into eRMS, including any potential corrective action. The employee's supervisor and Labor Relations specialist are responsible for entering information related to attendance reviews, corrective action, and grievance activity.

There was no specific policy on what administrative actions should be recorded in eRMS' *Administrative Action Summary* section. In addition, management was provided conflicting instructions on what discipline and administrative actions to record in eRMS' *Administration Action Summary* section. For example, one manager was instructed to never include 7 – or 14–day suspensions in eRMS and another stated that no annotations are required at any stage of the eRMS process. However, our reviews of eRMS showed other managers recorded 7 – and 14–day suspensions in the system.

When management does not document employee administrative actions, they may not be able to provide support to Labor Relations and union officials when administrative actions are issued. The unions have a legal obligation to represent their employees and are trained to identify violations. A procedural error on management's part could result in a lesser action than management's recommended discipline.

## Recommendation #5

We recommend the **Vice President, Human Resources**, update policy to clarify and communicate where disciplinary and health benefit documents for absence without leave employees should be maintained, and as appropriate, distribute to employees.

## Recommendation #6

We recommend the **Vice President, Human Resources**, in conjunction with the **Vice President, Labor Relations**, develop a process to verify all appropriate absence without leave employees' disciplinary and health benefits documentation are timely reviewed and uploaded when sent to their electronic official personnel folder.

## Recommendation #7

We recommend the **Vice President, Human Resources**, in conjunction with the **Vice President, Labor Relations**, review and update guidance on the Human Resources Shared Service's website to ensure appropriate documentation is included in an employee's electronic official personnel folder.

## Recommendation #8

We recommend the **Vice President, Human Resources**, in conjunction with the **Vice President, Labor Relations**, establish a policy to define how to properly record administrative actions in the Enterprise Resource Management System, Administrative Action Summary.

# **Management's Comments**

Management generally agreed with all the recommendations but disagreed with some of the findings and assumptions in the report and the monetary impact.

Regarding recommendation 1, management will draft a policy by April 1, 2022, to reiterate to supervisors and managers how to appropriately record AWOL leave entries in eRMS.

<sup>43</sup> We excluded 12 results we deemed as "partial" from the sampled universe for this analysis. A partial result occurrence was deemed as at least one matching and one missing discipline. For example, a LOW matching in both systems but a 7-day suspension only appearing in one system.

<sup>44</sup> At the time of our audit, thresholds were set by finance level based on a determination at the area/district level.

Regarding recommendation 2, management will review the disciplinary guidance on district websites to ensure they are consistent with the principles of progressive discipline as outlined in collective bargaining agreements. They will update and communicate the guidance as necessary. The target implementation date is July 1, 2022.

Regarding recommendation 3, management stated that they already provide regular attendance management training to managers and supervisors twice per year. This training includes proper inputting of AWOL hours. Management will review the training to ensure it contains sufficient information on how to address AWOL employees and update the training as appropriate. The target implementation date is October 31, 2022.

Regarding recommendation 4, management will reiterate to managers and supervisors their responsibilities related to the management of employees on AWOL, including the importance of completing and maintaining AWOL attendance reviews and other required supporting documentation. The target implementation date is April 1, 2022.

Regarding recommendations 5 and 6, management will issue policy guidance by April 1, 2022, to (1) HRSSC processors on proper health benefit forms to be included in the eOPF and to (2) local Labor Relations managers for the preservation of disciplinary documents.

Regarding recommendation 7, management will issue guidance by April 1, 2022, on appropriate documentation retention in an eOPF, including disciplinary records. Management will ensure they update the HRSSC website to include guidance on appropriate eOPF documentation.

Regarding recommendation 8, management will reiterate eRMS guidance on administrative action capabilities and its usefulness as an additional attendance management tool for supervisors and managers. Additionally, management will ensure they publish the eRMS user guide to the Postal Service's intranet for ease of reference. The target implementation date is April 30, 2022.

Management disagreed with classifying the entire \$11.4 million spent on health benefit premiums for extended AWOL employees as unsupported questioned

costs. Management noted they are required to continue paying an employee's health benefit premiums while the disciplinary process is ongoing, and the employee remains on the rolls. Management further noted that it is virtually impossible to complete the disciplinary process in a 30 to 40 day window if an employee grieves the discipline. Therefore, management believes that at least a portion of the guestioned costs is outside of management's control.

Although management agreed with the importance of timely addressing employees in an AWOL status to promote operational efficiency and manage costs, they disagreed with the report's conclusion that without a specific disciplinary process for AWOL employees, "there is no way to determine if the nature of discipline is corrective or punitive and if the level of discipline is consistently used for similar AWOL offenses." The Postal Service noted that it is required to follow the principles of progressive discipline as outlined in the collective bargaining agreements and do not have "standardized" tracks of discipline for specific offenses.

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

# **Evaluation of Management's Comments**

We consider management's comments to be responsive to recommendations and the corrective actions should resolve the issues identified in the report.

Regarding management's disagreement with the entirety of the monetary impact, we considered the payment of health benefit premiums to be questioned costs because missing documentation prevented the Postal Service, in some cases, from moving forward with disciplinary action on AWOL employees or removing extended AWOL employees timely. Moreover, we were conservative in our approach for computing the questioned costs: (1) we considered employees who had been on AWOL status for more than 40 consecutive working days (two calendar months) to be excessive and (2) we only considered monetary impact if the extended AWOL employee was not terminated within the fiscal year in which they first were in AWOL status.

Regarding disagreement with the report's conclusion statement, we understand management is required to consider the individual circumstances of a particular

situation, including any prior discipline issued to the employee, when determining what discipline, if any, to issue. However, the principles of progressive discipline as outlined in Article 16 do not mention AWOL and is not exact about how AWOL is being managed, as identified during the audit. Therefore, we believe establishing some form of standardized guidance would promote consistency and allow the AWOL discipline process to be handled more efficiently.

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**

The scope of our audit was unscheduled leave – AWOL status nationwide from FYs 2018 through 2020. We did not include scheduled leave or other unscheduled leave other than AWOL in our scope. We focused on AWOL hours because when an employee is AWOL, they are still part of a facility's complement level. The AWOL employee's job responsibilities still need to be completed. If not available to perform the duties, the Postal Service may have to expend overtime for others to complete. In addition, AWOL employees are eligible to receive health benefits unless the employee is removed or reaches 365 days in a LWOP status and is eligible for the termination of coverage. Lastly, being mindful of COVID-19, we trended each year to account for the pandemic during FY 2020.

We conducted interviews at 24 judgmentally selected sites in the Atlantic and Central areas. In each area, we selected one district with a high average number of AWOL hours per person and one district with a low average number of AWOL hours per person. We then filtered down to the facilities with a high average number of AWOL hours per person in both areas. This resulted in 20 post offices, four of which were timecard (manual) offices; three processing and distribution centers (P&DC); and one logistics and distribution center (L&DC). See Table 3 for the sites visited during the team's review.

**Table 3. Fieldwork Sites** 

Criteria	Region/ Area <sup>45</sup>	Division/ District <sup>46</sup>	Site	
Division/			Murray Hill Station	
Districts with a			Manhattanville Station	
High Average			Hamilton Grange Station	
Number of		THEW TOTAL		
AWOL Hours	AWOL Hours		Grand Central Station	
Per Person			Cathedral Station	

Criteria	Region/ Area <sup>45</sup>	Division/ District <sup>46</sup>	Site	
	Eastern Region	New York Metro	Morgan P&DC	
			Northtown Station	
			Rogers Park Station	
	Central Area	Illinois 1	Jefferson Park Carrier Annex	
			Nancy B. Jefferson Station	
			Wonder Lake Post Office	
Division/ Districts with a High Average	Eastern Region	Westshores	Chicago Metro L&DC	
	Atlantic Area	Massachusetts- Rhode Island	Roxbury Station	
			Fort Point Station	
			Waltham Branch	
Number of			Roslindale Station	
AWOL Hours Per Person			Lawrence Post Office	
Pel Pelsoli	Eastern Region	Westshores	Boston P&DC	
	Central Area	Wisconsin	Dr. Martin Luther King Jr. Station	
			Bay View Station	
			West Milwaukee Station	
			West Allis Branch	
			Salem Post Office	
	Eastern Region	New England	Milwaukee P&DC	

Source: OIG.

<sup>45</sup> Area changes effective August 7, 2020. Logistics and Processing Operations is split into two regions (Eastern and Western) and comprised of 13 divisions. Retail and Delivery is split into four areas (Atlantic, Central, Southern, and Western-Pacific) and has 50 districts.

<sup>46</sup> Organization re-structure as of March 3, 2021.

To accomplish our objective, we:

- Reviewed and analyzed eRMS AWOL data from October 1, 2017, through September 30, 2020.
- Identified employees and facilities with high and low numbers of AWOL hours.
- Determined and assessed total number of AWOL hours.
- Interviewed Postal Service HQ personnel to determine the management of AWOL employees and applicable policies and guidance available.
- Interviewed four district offices to meet with Human Resources and Labor Relations Managers/Specialists to determine the management of AWOL employees and guidance distributed to the field.
- Assessed management of AWOL by randomly sampling 195 of 2,966 employees on extended AWOL<sup>47</sup> to determine if management followed established procedures to remove AWOL employees, terminated health benefits of eligible employees, and included supporting documentation within applicable systems. See Table 4 for the eOPF forms reviewed.
- Analyzed eRMS AWOL data to identify trends, risk areas, and anomalies.
- Reviewed Postal Service policies and procedures regarding unscheduled leave and discipline, specifically as it relates to AWOL.
- Identified health benefit plans available for Postal Service employees and reviewed the termination process.

Table 4. eOPF Reviewed Forms List

Form ID	Description	Form Category	
PS Form 50	Notification of Personnel Action – LWOP (Exceeding 30 Calendar Days)	Personnel Action	
USPS 135	LWOP - Over 30-Day Letter to Employee	Compensation and Benefits	
PS Form 3111	FEHB Coverage or Termination While in LWOP Status	Compensation and Benefits	
SF 2810	Notice of Change in Health Benefits Enrollment FORM	Compensation and Benefits	
USPS 87	Notice of Termination of Health and Life Insurance Coverage	Compensation and Benefits	
DISC	Disciplinary Notice of Decision Letter	Discipline	

Source: OIG analysis.

We conducted this performance audit from May 2021 through January 2022 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 December 9, 2021 and included their comments where appropriate.

<sup>47</sup> All employees over a month (20 working days or 30 calendar days) who have been in continuous AWOL status.

We assessed the reliability of eRMS data by validating the accuracy and completeness of the data. For accuracy, we randomly selected 20 employees and traced their PS Forms 3972 back to eRMS. For completeness, we compared eRMS data provided by the Postal Service with data extracted separately by the OIG. We determined that the data were sufficiently reliable for the purposes of this report.

# **Prior Audit Coverage**

While the OIG has conducted a series of unscheduled leave audits in the past, there have been no audits conducted specifically on AWOL nationwide. Below are the series of unscheduled leave audits conducted in districts:

Report Title	Objective	Report Number	Final Report Date	Monetary Impact (in millions)
Unscheduled Leave in the New York District	Assess the management of unscheduled leave in the New York District and identify opportunities to reduce unscheduled leave and its associated costs.	HR-AR-17-007	6/26/2017	\$7.0
Unscheduled Leave in the Baltimore District	Assess the management of unscheduled leave in the Baltimore District and identify opportunities to reduce unscheduled leave and its associated costs.	HR-AR-17-012	8/24/2017	\$1.5
Unscheduled Leave in the Triboro District	Assess the management of unscheduled leave in the Triboro District and identify opportunities to reduce unscheduled leave and its associated costs.	HR-AR-17-011	8/17/2017	\$2.9
Unscheduled Leave in the Los Angeles District	Conduct a follow-up audit to assess the management of unscheduled leave in the Los Angeles District and identify opportunities to reduce unscheduled leave and its associated costs.	HR-AR-17-009	8/16/2017	\$4.9

# Appendix B: Management's Comments



January 3, 2022

JOSEPH WOLSKI

SUBJECT: Unscheduled Leave—Absence Without Leave Status (Report Number 21-140-DRAFT)

Thank you for the opportunity to review the above-referenced audit report. Postal Service management agrees on the importance of timely addressing employees in an Absence Without Leave (AWOL) status to promote operational efficiency and manage costs. However, we disagree on some of the findings and assumptions in the Office of Inspector General's (OIG's) report.

With respect to employee discipline, the report recognizes that discipline is issued on a case-by-case basis but insists on a one-size-fits-all disciplinary process for AWOL employees. As explained to the OIG, Postal Service management is required to follow the principles of progressive discipline as outlined in Article 16 of our collective bargaining agreements; we do not have "standardized" tracks of discipline for specific offenses. We disagree with the report's conclusion that without a specific disciplinary process for AWOL employees, "there is no way to determine if the nature of discipline is corrective or punitive and if the level of discipline is consistently used for similar AWOL offenses." The Postal Service is required by its agreements as well as arbitral precedent to take into account the individual fact circumstances of a particular situation, including any prior discipline issued to the employee, when determining what discipline, if any, to issue.

Nor do we agree with the classification of the entirety of the \$11.4 million the Postal Service spent on health benefit premiums from FY2018 through FY2020 for extended AWOL employees as unsupported questioned costs. As previously pointed out to the OIG, the report's finding that "it should only take about a month to remove an AWOL employee" is incorrect. The timeframes associated with the collectively bargained disciplinary process are virtually impossible to complete within a 30-40 day window if an employee grieves the discipline. As noted by the OIG, the Postal Service is required to continue paying an employee's health benefit premiums while the disciplinary process is ongoing and the employee remains on the rolls. As such, at least a portion of the \$11.4 million paid for health benefit premiums is outside of postal management's control.

Although the Postal Service disagrees with these elements of the report, it will address the OIG's recommendations as follows:

#### Recommendation #1:

We recommend the Vice President, Human Resources, update policy to clarify how to appropriately record leave entries on absent without leave employees' timecards and in the Enterprise Resource Management System and, in conjunction with the Chief Retail & Delivery Officer and Chief Logistics & Processing Operations Officer, distribute to all supervisors and managers to ensure consistent application.

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#### Management Response / Action Plan:

Management agrees with this recommendation and will draft a policy statement, in conjunction with the Chief Retail & Delivery Officer and Chief Logistics & Processing Operations Officer, to reiterate to supervisors and managers how to appropriately record AWOL leave entries in eRMS, facilitating consistency in application.

Target Implementation Date: April 1, 2022

Responsible Official: Vice President, Human Resources

#### Recommendation #2:

We recommend the Vice President, Labor Relations, in conjunction with the Vice President, Human Resources, review disciplinary guidance and templates related to absence without leave employees on each district's website to ensure consistency and, as appropriate, update and communicate quidance.

#### Management Response / Action Plan:

Management agrees with this recommendation in part. As noted above, we do not have a disciplinary process that is specific to AWOL offenses; rather, we are obligated to follow the principles of progressive discipline as outlined in our collective bargaining agreements. In addition, locally negotiated agreements and local past practice may result in different progressions of discipline in different districts before the removal stage is reached. We will review the disciplinary guidance on our district websites to ensure they are consistent with the principles of progressive discipline as outlined in our collective bargaining agreements, and update and communicate guidance as necessary.

Target Implementation Date: July 1, 2022

Responsible Official: Vice President, Labor Relations

#### Recommendation #3:

We recommend the Vice President, Human Resources, provide regularly updated Enterprise Resource Management System and discipline training for manager and supervisors to facilitate management of absence without leave employees.

#### Management Response / Action Plan:

Labor Relations already provides regular attendance management training to managers and supervisors twice a year, which includes eRMS training on proper inputting of AWOL. Management agrees to review the training to ensure it contains sufficient information concerning how to address AWOL employees and update the training as appropriate.

Target Implementation Date: October 31, 2022

Responsible Official: Vice President, Human Resources, and Vice President, Labor Relations

#### Recommendation #4:

We recommend the Chief Retail & Delivery Officer, in conjunction with the Chief Logistics & Processing Operations Officer, reiterate management responsibilities to ensure managers and supervisors complete, timely review, and maintain absence without leave attendance reviews; Postal Service (PS) Form 3971, Request for or Notification of Absence; PS Form 3972, Absence Analysis; and other required supporting documentation.

#### Management Response / Action Plan:

Management agrees with this recommendation. The Chief Retail & Delivery Officer, in conjunction with the Chief Logistics & Processing Operations Officer, will reiterate management responsibilities related to the management of employees on AWOL, including the importance of completing and maintaining AWOL attendance reviews and other required supporting documentation.

Target Implementation Date: April 1, 2022

Responsible Official: Chief Retail & Delivery Officer and Chief Logistics & Processing Operations Officer

#### Recommendation #5:

We recommend the Vice President, Human Resources, update policy to clarify and communicate where disciplinary and health benefit documents for absence without leave employees should be maintained, and as appropriate, distribute to employees.

#### Management Response / Action Plan:

Management agrees to issue policy guidance to Human Resources Shared Service Center (HRSSC) processors on proper health benefit forms to be included in employee official personnel folders (eOPF), and Managers, Labor Relations, at a local level, for the preservation of disciplinary documents.

Target Implementation Date: April 1, 2022

Responsible Official: Vice President, Human Resources, and Vice President, Labor Relations

#### Recommendation #6:

We recommend the Vice President, Human Resources, in conjunction with the Vice President, Labor Relations, develop a process to verify all appropriate absence without leave employees' disciplinary and health benefits documentation are timely reviewed and uploaded when sent to their electronic official personnel folder.

#### Management Response / Action Plan:

In line with our response to recommendation number 5, management agrees to issue policy guidance to HRSSC processors on proper health benefit forms to be included in an eOPF, and Managers, Labor Relations, at a local level, for the preservation of disciplinary documents. This guidance with include the importance of timely review and inclusion in eOPF.

Target Implementation Date: April 1, 2022

Responsible Official: Vice President, Human Resources, and Vice President, Labor Relations

#### Recommendation #7:

We recommend the Vice President, Human Resources, in conjunction with the Vice President, Labor Relations, review and update guidance on the Human Resources Shared Service's website to ensure appropriate documentation is included in an employee's electronic official personnel folder.

#### Management Response / Action Plan:

Management agrees to issue guidance on appropriate documentation retention in an eOPF, to include disciplinary records. Management will ensure the HRSSC website is updated to include guidance on appropriate documentation for eOPF.

Target Implementation Date: April 1, 2022

Responsible Official: Vice President, Human Resources, and Vice President, Labor Relations

#### Recommendation #8:

We recommend the Vice President, Human Resources, in conjunction with the Vice President, Labor Relations, establish a policy to define how to properly record administrative actions in the Enterprise Resource Management System, Administrative Action Summary.

#### Management Response/ Action Plant

Management does not agree that the absence of administrative actions recorded within the eRMS database renders Labor Relations unable to support disciplinary actions issued, relative to AWOL. As stated in management's response to recommendation #5, District Managers, Labor Relations, are responsible for the preservation of disciplinary records. The eOPF system is designated for the retention of such records. In addition to the updated guidance, management will issue on the appropriate documentation regarding instances of AWOL, we agree to reiterate the eRMS guidance on administrative action capabilities and its usefulness as an additional attendance management tool for supervisors and managers. Additionally, we will ensure the eRMS user guide will be published to the Postal Blue page for ease of reference.

Target Implementation Date: April 2022

Responsible Official: Vice President, Human Resources, and Vice President, Labor Relations

Of Joshua D. Colin
Chief Retail and Delivery Officer and
Executive Vice President

E-SIGNED by Isaac.S Cronkhite on 2021-12-30 16:07:48 CST

Isaac S, Cronkhite Chief Logistics and Processing Officer and Executive Vice President

E-SIGNED by Simon.M Storey on 2021-12-31 14:44:39 CST

Simon M. Storey Vice President, Human Resources

E-SIGNED by Katherine.S Attridge on 2022-01-03 08:30:22 CST

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