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Transmittal Letter

OFFICE OF INSPECTOR GET UNITED STATES POSTAL S	
December 6, 2021	
MEMORANDUM FOR:	CHENISE LEDOUX MANAGER, TEXAS 2 DISTRICT
	SemBally
FROM:	Sean Balduff Director, Delivery and Retail Response Team
SUBJECT:	Audit Report – Mail Delivery and Customer Service Operations – Ashford West and Westbury Stations, Houston, TX (Report Number 21-233-R22)
	esults of our audit of Mail Delivery and Customer Service st and Westbury Stations, Houston, TX.
	ation and courtesies provided by your staff. If you have any nal information, please contact Jennifer Schneider, Operational 8-2100.
Attachment	
Delivery Operations Vi Retail and Post Office	esponse Management ce President Operations Vice President Operations Southern Vice President

Results

Background

This report responds to a request from U.S. Representative Lizzie Fletcher, 7th Congressional District of Texas, to evaluate select mail delivery and customer service operations and determine if internal controls are effective at the Ashford West and Westbury Stations in Houston, TX (Project Number 21-233). Representative Fletcher's June 2021 request specifically mentioned lost mail and the removal of drive-up collection boxes.

The two stations are in the Postal Service's Texas 2 District in the Southern Area and have a combined 116 city routes. Staffing at the stations includes 130 full-time city carriers, 58 part-time city carriers,¹ 15 full-time clerks, and 4 part-time clerks (see Table 1).

Table 1. Employees and Routes

Station	City Routes	Full-Time City Carriers	Part-time City Carriers	Full-Time Clerks	Part-Time Clerks
Ashford West	64	74	38	8	3
Westbury	52	56	20	7	1
Total	116	130	58	15	4

Source: U.S. Postal Service Office of Inspector General (OIG) analysis of data from City Delivery Variance and Customer Service Variance.

Objective, Scope, and Methodology

Our objective was to evaluate select mail delivery and customer service operations and determine whether internal controls were effective at the Ashford West and Westbury Stations in Houston, TX.

To accomplish our objective, we reviewed delivery metrics including the number of routes and carriers, mail arrival time, amount of reported delayed mail, package scanning, and Distribution Up-Time (DUT).² During our site visits from August 31 – September 1, 2021, we reviewed station safety and security procedures, mail conditions, arrow lock key³ security procedures, truck arrival scanning procedures, and service performance measurements.⁴ We also analyzed the scan status of mailpieces at the carrier cases and in the "Notice Left"⁵ area and interviewed station management and employees at both stations.⁶

We relied on computer-generated data from the Product Tracking and Reporting system (PTR)⁷ and the Surface Visibility (SV)⁸ database. Although we did not test the validity of the controls over these systems, we assessed the accuracy of the data by reviewing existing information, comparing data from other sources, observing operations, and interviewing Postal Service officials knowledgeable about the data. We determined the data were sufficiently reliable for the purposes of this report.

We conducted this audit from August through December 2021 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objective. We believe that the evidence obtained

- 4 A measure of the time it takes to process letters, flats, and parcels from collection to delivery.
- 5 The area of a postal facility where letters or packages that the carriers were unable to deliver are stored for customer pickup.
- 6 The city carriers we interviewed had from nine months to 40 years of service.
- 7 A system of record for all delivery status information for mail and packages with trackable services and barcodes.
- 8 A mobile scanning application that enables Postal Service personnel to track the mail across the surface transportation network.

¹ We refer to city carrier assistants as part-time city carriers. These are non-career employees who perform the full range of city carrier duties, but do not have an assigned route and can be moved to other delivery units as necessary.

² Time of day that clerks have completed distributing mail to the carrier routes.

³ A distinctively shaped key carriers use to open mail-receiving receptacles such as street collection boxes and panels of apartment house mailboxes equipped with an arrow lock. Arrow lock keys are accountable property and subject to strict controls.

provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on November 10, 2021, and included their comments where appropriate.

Findings Summary

We identified delivery and customer service issues at the Ashford West and Westbury Stations. These issues included delayed mail, inaccurate reporting of mail conditions, improper scanning of packages and inbound mail trucks, and inadequate safeguarding of assets.

Finding #1: Delayed Mail

We identified delayed mail at the Ashford West and Westbury Stations during our site visits on August 31 and September 1, 2021 (see Figure 1). Specifically, we identified about 6,217 pieces⁹ of delayed mail at the carrier cases during our visit to the Ashford West Station and about 2,808 pieces of delayed mail at the carrier cases and the letter distribution area during our visit to the Westbury Station (see Table 2).

Figure 1. Examples of Delayed Mail



Source: OIG photos taken August 31 and September 1, 2021.

Table 2. Delayed Mail Observed

Station	Letters	Flats	Parcels	Total
Ashford West	5,675	518	24	6,217
Westbury	2,341	439	28	2,808
Total	8,016	957	52	9,025

Source: OIG observations on August 31 and September 1, 2021.

Postal Service policy¹⁰ states that all types of First-Class Mail, Priority Mail, and Priority Express Mail are always committed for delivery on the day of receipt. Any committed mail not processed and taken out for delivery on the day of receipt is delayed. Policy¹¹ also requires the supervisor to certify in the Delivery Management System that the station is clear of committed mail for that day's delivery and that carriers did not return deliverable mail to the station.

According to management at both stations, a contributing factor to the delayed mail was that carriers were returning from their routes without completing all their assigned deliveries. However, based on our observations, delayed mail occurred due to a lack of management oversight. Specifically, station management did not follow requirements to verify that the station was clear of all committed mail when carriers began street deliveries or meet with carriers upon returning from their routes to determine whether all mail was delivered. For example, an evening supervisor at the Ashford West Station was delivering mail when carriers were returning to the station and was not available to greet carriers upon their return. The station manager should have assigned another supervisor to ensure that carriers had delivered all their mail. At the Westbury Station, we identified letter mail in the distribution area on Wednesday, September 1, that was not distributed to carriers for delivery. According to the station manager, some of this mail arrived on Saturday, August 28. In addition, the station manager did not specifically assign either of the two evening supervisors to greet carriers as they returned

⁹ OIG analysis is based on Postal Service conversion factors in Handbook M-32, Management Operating Data Systems, Appendix D.

¹⁰ Committed Mail & Color Code Policy for Marketing Mail stand-up talk, February 2019.

¹¹ Delivery Management System, Standard Work Instruction.

to the station; therefore, neither supervisor performed this function. As a result, management did not ensure all committed mail was delivered on a daily basis.

By ensuring all mail is processed and delivered timely, management can increase customer satisfaction and enhance the Postal Service brand.

Recommendation #1

We recommend the **District Manager, Texas 2 District**, develop and implement an action plan requiring supervisors to verify that the Ashford West and Westbury Stations are clear of all committed mail daily when the carriers begin street deliveries and that carriers do not return deliverable mail to the stations.

Finding #2: Inaccurate Reporting of Mail Conditions and Expected Delivery

We determined management at the Ashford West and Westbury Stations did not accurately report the 9,025 pieces of undelivered mail that we identified during our site visits. In addition, clerks were giving the indication that all committed mail was ready for carriers to deliver by performing the DUT scans before the mail was distributed to the carriers.

We also determined at the Westbury Station that packages were scanned with the wrong expected delivery date. For example, on Tuesday, August 31, we determined a distribution clerk changed the expected delivery date on the Passive Adaptive Scanning System (PASS)¹² machine to Wednesday, September 1, and continued to sort packages even though they were committed for Tuesday's delivery. As a result, the tracking data visible to the customer reflected the incorrect expected delivery day.

Postal Service policy¹³ states that all delayed mail is required to be reported in the Customer Service Daily Reporting System¹⁴ (CSDRS). In addition, district management stated station personnel are expected to perform DUT scans when distribution of the mail to the carriers is completed. Further, guidance¹⁵ states that distribution employees should scan packages to reflect the day they are committed for delivery.

Station managers at both stations stated that the evening supervisors did not follow the correct procedures for reporting the delayed mail. In addition, management stated they were unaware that the DUT scan was being made prior to the completion of mail distribution to the carrier routes. Management at the Westbury Station stated they were unaware that the expected delivery day for parcels was being changed by a clerk prior to the mail distribution being completed. However, based on our observations, we determined these issues occurred because management at both stations did not always monitor and verify that delayed mail was entered into CSDRS accurately. In addition, management did not monitor DUT scans and expected delivery dates daily to verify their accuracy.

Inaccurate reporting of delayed mail in CSDRS provides management at the local, district, area, and headquarters levels with an inaccurate status of mail delays. This lack of visibility into station conditions inhibits management's ability to take necessary actions to address mail processing and delivery issues. Additionally, inaccurate reporting of DUT provides management at local, district, area, and headquarters levels with inaccurate status of mail delivery conditions and can result in improper actions taken to address potential issues. Further, customers cannot determine the actual status of their packages when clerks perform package scans with an inaccurate expected delivery day, which can erode consumer confidence and trust.

¹² A scanning system used in stations to scan packages and identify associated delivery routes. PASS enables clerks without route knowledge training to sort packages and provides both visual and audible indicators for routing information.

¹³ Customer Service Daily Reporting System, Guidelines and Definitions, September 2016.

¹⁴ A tool for station management to manually self-report delayed mail, which provides a snapshot of the daily mail conditions of the mail at the point in time when the carriers have departed for the street.

¹⁵ Delivery Day Indicator Service Talk, September 2019.

Recommendation #2

We recommend the **District Manager, Texas 2 District**, develop and implement an action plan to require management to verify that all delayed mail is reported in the Customer Service Daily Reporting System and all committed mail is distributed to carriers before the daily Distribution Up-Time at the Ashford West and Westbury Stations. The plan should also require the expected delivery day to be accurately reflected for parcels at the Westbury Station.

Finding #3: Package Scanning Issues

We identified improper package scanning and handling practices at the Ashford West and Westbury Stations. We used geolocation data to identify Stop-The-Clock (STC)¹⁶ scans that occurred at the station instead of the intended delivery address. STC scans for packages should occur at the point of attempted delivery. The two stations had a total of 1,058 STC scans at the stations between May and July 2021, and most of these packages were scanned "Delivered" (see Table 3).

Table 3. STC Scans at the Station May - July 2021

Station	Delivered	No Secure Location	Receptacle Full	No Authorized Recipient	Refused	Total
Ashford West	208	151	42	3	1	405
Westbury	612	13	26	2	0	653
Total	820	164	68	5	1	1,058

Source: OIG analysis of PTR data.

We also conducted on-site observations at the stations on the morning of August 31, 2021, before carriers arrived for the day. During our observations, we judgmentally selected 113 packages (56 from the carrier cases and 57 from the "Notice Left" area) to review and analyze scanning and tracking data.

Of the 113 sampled packages, 59 packages had improper or missing STC scans. Specifically:

- Thirty-two packages were missing STC scans to let the customer know the reason for non-delivery.
- Fifteen packages were scanned "Delivered". A "Delivered" scan should only be made when a package is successfully left at the intended delivery address.
- Eight packages received STC scans at a location other than the delivery point. All package delivery scans should be made upon the attempt to deliver the packages at the intended delivery address.
- Four packages were scanned "Available for Pickup" in error.

Further, we observed 19 packages in the "Notice Left" area that should have been returned to the sender.¹⁷ These packages ranged from three to 160 days past their return dates. The Postal Service's goal is to ensure proper delivery attempts for mailpieces to the correct address,¹⁸ which includes scanning packages at the time and location of delivery.¹⁹

These issues occurred because local management did not adequately monitor or enforce package scanning and handling procedures. Customers rely on accurate scan data to track their packages in real time. When employees do not scan mailpieces correctly, customers are unable to determine the actual status of their packages. By improving scanning operations, management can potentially improve mail visibility, increase customer satisfaction, and enhance the customer experience as well as the Postal Service brand.

¹⁶ A scan event that indicates the Postal Service has completed its commitment to deliver or attempt to deliver the mail piece. Examples of STC scans include "Delivered", "Business Closed", and "No Secure Location Available".

¹⁷ Notice Left and Return Guidelines, dated July 2007, states that domestic packages should be returned to sender on the 15th calendar day and international packages should be returned to sender on the 30th calendar day after a notice is left.

¹⁸ Delivery Done Right the First Time stand-up talk, March 2020.

¹⁹ Carriers Delivering the Customer Experience stand-up talk, July 2017.

Recommendation #3

We recommend the **District Manager, Texas 2 District**, develop and implement an action plan to verify that employees at the Ashford West and Westbury Stations follow standard operating procedures for scanning and that management systematically review and monitor scan data for compliance.

Finding #4: Inbound Mail Truck Arrival Scans

Inbound mail truck arrival scans at the Ashford West and Westbury Stations were not completed as required. Specifically, we observed employees at the Ashford West Station scanning a printed barcode secured to a piece of equipment inside the station instead of the barcode on the truck. At Westbury Station, employees were not making scans of the inbound mail trucks upon arrival during our initial observations.

A review of trips arriving from the North Houston P&DC identified that for the 30day period ending August 16, 2021, station employees did not perform an "Arrive" scan on 144 (95 percent) of the 151 total inbound trips to the two stations (see Table 4).

Table 4. Inbound Truck Arrival Scans July 17 - August 15, 2021

Station	Total Inbound Trips Scheduled	Total Missing Scans	Percent Missing
Ashford West	79	79	100%
Westbury	72	65	90%
Total	151	144	95%

Source: OIG analysis of data from SV.

This occurred at both stations because management did not review truck arrival scan performance data and follow-up with employees regarding missing or questionable scans. Management at both stations stated they were unaware that scanning was not being conducted as required.

20 United States Postal Service Standard Operating Procedure - Subject: Trailer Scans at Delivery Units.

Mail Delivery and Customer Service Operations – Ashford West and Westbury Stations, Houston, TX Report Number 21-233-R22

Postal Service policy²⁰ states that employees must scan the trailer barcode on trucks arriving at the station during local operating hours. When employees do not scan arrival truck barcodes, the Postal Service does not receive timely transportation information and is unable to address issues that may be causing mail delays.

Recommendation #4

We recommend the **District Manager, Texas 2 District**, develop and implement an action plan to verify that employees at the Ashford West and Westbury Stations comply with mail truck arrival scanning requirements.

Finding #5: Safeguarding of Assets

Management at the Ashford West and Westbury Stations did not properly manage and safeguard Postal Service assets including delivery vehicles and arrow lock keys.

Mail Delivery Vehicles

On August 31, 2021, we observed mail delivery vehicles that were not properly secured at the Ashford West and Westbury Stations. Between the two stations, we determined that 68 of the 118 vehicles were unlocked. In addition, we found six vehicles with undelivered mail inside them (see Table 5).

Table 5. Mail Delivery Vehicles Not Properly Secured

Station	Vehicles on Site	Vehicles Not Properly Secured	Vehicles with Undelivered Mail
Ashford West	66	30	4
Westbury	52	38	2
Total	118	68	6

Source: OIG observations at the Ashford West and Westbury Stations on August 31, 2021.

At both stations, evening supervisors were responsible for completing the PM Supervisor Review Checklist, which includes a check of each vehicle being secure and free of mail. At the Ashford West Station, one evening supervisor stated he was too busy delivering mail to check the security of all the delivery vehicles. At the Westbury Station, the acting station manager stated that both evening supervisors were responsible for the vehicle checks and she was unaware that they were not always done.

These conditions occurred because station management did not verify that carriers were securing and locking their vehicles at the end of the day, as required in their daily PM Supervisor Review Checklist.²¹ When vehicles are left unlocked, there is an increased risk that they could be vandalized or stolen.

Arrow Lock Keys

Arrow lock keys were not properly managed at the Westbury Station. Specifically, we reviewed the station's arrow lock key log and conducted a physical inventory of the keys at the station. We could not physically locate five of the 24 keys listed on the log. We also found four additional keys at the station that were not entered in the log.

These conditions occurred due to insufficient management oversight. Specifically, management did not enforce procedures for carriers to check in their arrow lock keys when they returned from their routes. Carriers told us that there was not always a clerk or supervisor to return their key to in the evening, so they left the keys in an unsecured area.

Postal Service policy²² requires management to account for arrow lock keys at the facility level. Insufficient oversight of arrow lock keys increases the risk of mail theft.

Recommendation #5

We recommend the **District Manager, Texas 2 District**, develop and implement an action plan verifying that management at the Ashford West and Westbury Stations complete all activities required in the PM Supervisor Review Checklist daily.

Recommendation #6

We recommend the **District Manager, Texas 2 District**, develop and implement an action plan to verify management at the Westbury Station maintains a current arrow lock key inventory and properly secures arrow lock keys when carriers return from their routes.

Other Matters

The request from Representative Fletcher specifically mentioned lost mail and the removal of drive-up mail collection boxes. Delayed mail and improper scanning practices could contribute to the perception of lost mail until it reaches its intended recipient. Implementation of our recommendations could reduce the perception of lost or stolen mail by customers in the areas served by the Ashford West and Westbury Stations. In addition, concerns regarding stolen mail have been referred to the OIG Office of Investigations for review. Regarding the drive-up collection boxes, management stated there have been multiple attempts at mail theft by someone physically breaking into some drive-up mail collection boxes. The drive-up collection box at the Ashford West Station was deemed inoperable following an attempted mail theft incident and management replaced it with a new collection box on October 16, 2021. The drive-up collection box at the Westbury Station was also replaced on June 1, 2021, and was functioning during our review (see Figure 2). As a result, we are not making a recommendation for this issue.

²¹ Delivery Management System, Standard Work Instructions.

²² Arrow Key Standard Work Instructions, dated April 23, 2020.

Figure 2. New Drive-up Collection Boxes



Source: OIG photos taken October 18, 2021.

Management's Comments

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

Regarding recommendation 1, district management stated that they directed the Customer Service Operations Managers (CSOM) for Ashford West and Westbury to instruct their unit management and craft employees to deliver all committed mail daily and report any committeed mail not delivered in CSDRS. Additionally, management stated they will conduct 10 or more virtual and on-site audits to identify and observe any curtailed or delayed mail to validate entries in CSDRS. Management's target implementation date to complete these audits is December 31, 2021.

Regarding recommendation 2, district management stated that they instructed the managers of the Ashford West and Westbury Stations to complete the DUT scans after all mail for delivery has been processed. District management also stated that they directed the CSOM for each station to monitor DUT scans daily and complete virtual audits to ensure all mail is processed prior to the scans being made. Management's target implementation date is December 31, 2021.

Regarding recommendation 3, district management stated that they instructed all unit managers to follow the "Right Scan, Right Place and Right Time" process on individual telecoms during the month of November 2021. In addition, the district manager has directed Post Office Operations Managers and CSOMs to report upon scandalous scans, scanning Variances, "No Access", and "Mis-sent" scans in order to monitor and identify instances of inaccurate scanning. Management stated this monitoring began November 1 and is still ongoing.

Regarding recommendation 4, district management stated that they directed Ashford West and Westbury Station managers to retrain employees on visibility scanning for arriving trucks. In addition, district management stated they will conduct ten or more virtual and on-site audits to identify and observe any discrepancies or opportunities with surface visibility scanning at both offices. Management's target implementation date to complete these audits is December 31, 2021.

Regarding recommendation 5, district management stated that they directed the Ashford West and Westbury Station managers to follow and complete the PM Supervisor Review Checklist in the Delivery Management System on a nightly basis. In addition, managers have been directed to inventory all vehicles and ensure they are secured, clean, and free of mail and mail-transporting equipment. District management stated they will conduct ten or more virtual and on-site audits to identify and correct any security or behavioral issues related to unsecured vehicles or mail left in them. Management's target implementation date to complete these audits is December 31, 2021.

Regarding recommendation 6, district management stated that they directed the Ashford West and Westbury Station managers to follow arrow key procedures including conducting a semiannual arrow key inventory; reconciling to prior inventories; and reporting broken, lost, or stolen keys appropriately. Both station managers will ensure all arrow keys are accounted for daily by verifying that a clerk has cleared each carrier's arrow key. In addition, management will conduct ten or more virtual and on-site audits to identify and correct any arrow key security opportunities and processes. Management's target implementation date to complete these audits is December 31, 2021.

Evaluation of Management's Comments

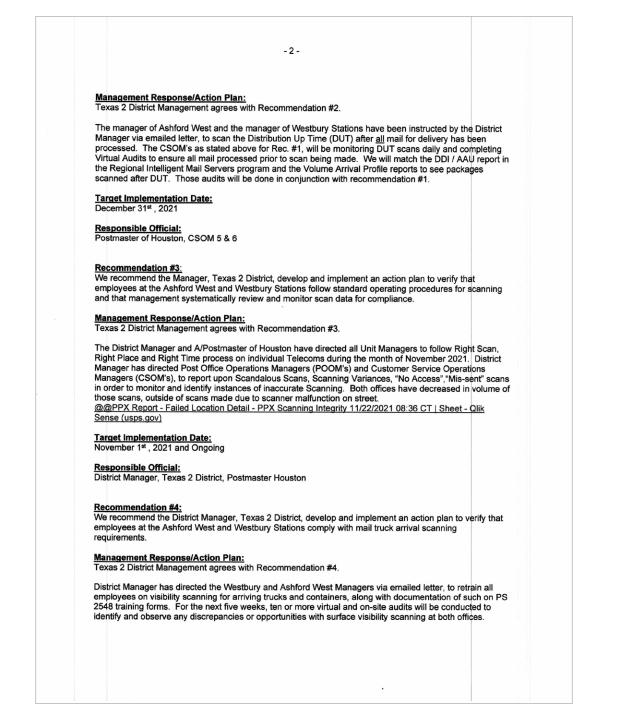
The OIG considers management's comments responsive to the recommendations in the report.

Regarding recommendation 3, management will need to provide evidence that Ashford West and Westbury Station managers are systematically reviewing and monitoring scan data for compliance before we can close the recommendation. It appears that management tried to provide a link to a dashboard titled "PPX Report - Failed Location Detail – PPX Scanning Integrity 11/22/2021". However, we could not access the report.

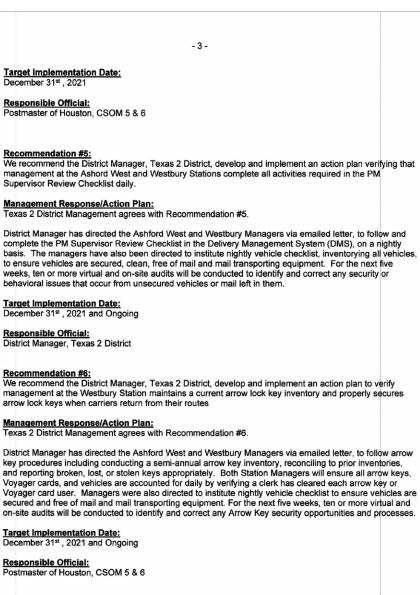
All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when actions are completed and supporting documentation for those actions that have already been completed. Recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendix A: Management's Comments

	ITED STATES
November	22, 2021
	WOLSKI R, AUDIT OPERATIONS
SUBJECT	Mail Delivery and Customer Service Operations Ashford West and Westbury Stations, Houston, TX Proiect Number 21-233-DRAFT
Delivery an	for the opportunity to respond to the Office of Inspector General (OIG) draft audit report "Mail Ind Customer Service Operations – Ashford West and Westbury Stations, Houston, TX (Project -233-DRAFT)." We agree with the findings and recommendations of the OIG per the action in below.
Ne recom supervisor	Indation #1: mend the District Manager, Texas 2 District, develop and implement an action plan requiring s to verify that the Ashford West and Westbury Stations are clear of all committed mail daily when s begin street deliveries and that carriers do not return deliverable mail to the stations.
	ent Response/Action Plan: strict Management agrees with Recommendation #1.
for Ashford heir Unit r distribution Manageme due to nate Services D Base (FDE Postal train and on-site	t Manager, Texas 2 District, has directed the Customer Service Operations Managers (CSOM) West (CSOM 6) and Westbury (CSOM 5) via ZOOM touchpoint and emailed letter, to instruct nanagement and craft employees upon clearing Function Four operations at the office for , that they are to deliver all committed mail daily. Completion of the AM review in DMS (Delivery ent System), will be validated for completion daily. If office is unable to deliver all committed mail, irral events or unforeseen circumstances, they are to report delayed volumes in Customer lelivery Reporting System (CSDRS), in addition to reporting impacted deliveries in Facilities Data i) and to notify their respective CSOM immediately. This instruction will be documented on hing form(s) PS 2548 for each employee. Additionally, for the next five weeks, ten or more virtual a udits will be conducted to identify and observe any curtailed or delayed volumes, and validate e entries in CSDRS and/or FDB (Operational Impacted Delivery Reporting)
	Dementation Date: 31 st , 2021
	ole Official: r of Houston, CSOM 5 & 6
We recom manageme all commit Westbury	ndation #2: mend the District Manager, Texas 2 District, develop and implement an action plan to require ent to verify that all delayed mail is reported in the Customer Service Daily Reporting System and ed mail is distributed to carriers before the daily Distribution Up-Time at the Ashford West and Stations. The plan should also require the expected delivery day to be accurately reflected for the Westbury Station.
	10 ALDINE BENDER RD RTH HOUSTON TX 77315-0800



11



WIN, OXU

Avia Wilbert A/Postmaster HOU for Chenise LeDoux District Manager, Texas 2 District



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