



OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

Highlights

Nationally the number of collection boxes declined by more than 12,000 in the past 5 years.

Background

Mail collection boxes are a visible representation of the U.S. Postal Service to the American public and are reliable, secure, and convenient receptacles for mail. As the Postal Service adapts its collection infrastructure to meet customers' needs at a reasonable cost, it has eliminated underused collection boxes that on average receive fewer than 25 pieces a day, and added collection boxes that are convenient for customers.

To identify underused collection boxes the Postal Service uses density tests to determine the average volume of mail collected, including an annual national density test, which was last conducted over a 2-week period in August and September 2015.

Nationally the number of collection boxes declined by more than 12,000 in the past 5 years. Some customers have complained the Postal Service has gone too far and removed most collection boxes, except those at the Post Office. In addition, they have questioned whether any cost savings result from collection box removals.

The Eastern Area had 28,670 collection boxes on October 1, 2014, and removed 353 collection boxes through February 29, 2016. Reasons for the removals included safety, multiple boxes at a location, and canceled contracts with contract postal units. Other factors management considered for removing

boxes included the volume of mail collected, the proximity of other publicly accessible collection points, and the needs of customers in the vicinity of the box.

Our objective was to assess the collection box removal process in the Eastern Area.

What The OIG Found

The Eastern Area's collection box removal process was not effective. While the area and its 10 districts had established procedures for removing and relocating collection boxes, they were not consistently followed. Specifically, only 60 of the 6,371 underused business and residential collection boxes identified during the 2015 national density test were removed or relocated. Our analysis indicated an additional 1,808 collection boxes could have been removed and another 637 relocated.

Furthermore, for the period October 1, 2014, through February 29, 2016, 213 collection boxes were deleted from the Collection Point Management System without Eastern Area approval and 322 out-of-service boxes were permanently removed from the street without Eastern Area approval or public notification to customers.

These conditions occurred because there was limited area and district oversight to approve and validate collection box



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removals or relocations. Also, officials did not continually review collection operations data to remove or relocate underused collection boxes to ensure efficient and economical operations. Finally, there were no procedures to consistently monitor collection boxes reported as out of service longer than 7 days.

As a result, the Postal Service may be incurring additional costs to collect from and maintain underused collection boxes that could be removed. We estimate removing unnecessary collection boxes throughout the Eastern Area would eliminate 73,043 workhours over the next 5 years, for an average future cost avoidance of more than \$700,000 annually. In addition, relocating underused collection boxes to more visible, higher traffic, and secure locations can better meet the needs of the customer to safely and easily access collection boxes.

What The OIG Recommended

We recommended management require each district to periodically evaluate whether to relocate or remove underused collection boxes included in the annual density test, maintain supporting documentation for removal and relocation decisions, and establish a process to monitor out-of-service collection boxes, including obtaining approvals and public notification.



Transmittal Letter



August 22, 2016

MEMORANDUM FOR: JOSHUA D. COLIN, PhD.

VICE PRESIDENT, EASTERN AREA OPERATIONS

E-Signed by Janet Sorensen ERIFY authenticity with eSign Deskto

FROM: Janet M. Sorensen

Deputy Assistant Inspector General for Retail, Delivery, and Marketing

SUBJECT: Audit Report – Collection Box Removal Process –

Eastern Area (Report Number DR-AR-16-007)

This report presents the results of our audit of Collection Box Removal - Eastern Area (Project Number 16XG015DR000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Rita F. Oliver, director, Delivery, or me at 703-248-2100.

Attachment

cc: Vice President, Delivery Operations

Corporate Audit and Response Management

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Findings

The Eastern Area's collection
box removal process
was not effective.

Introduction

This report presents the results of our self-initiated audit of the collection box removal process in the Eastern Area (Project Number 16XG015DR000). Our objective was to assess the collection box removal process in the Eastern Area. See Appendix A for additional information about this audit.

Mail collection boxes are a visible representation of the U.S. Postal Service to the American public and are reliable, secure, and convenient receptacles for mail. As the Postal Service adapts its collection infrastructure to meet its customers' needs at a reasonable cost, it has eliminated underused collection boxes that on average receive fewer than 25 pieces a day, and added collection boxes in places that are recognizable and convenient for its customers.

To identify underused collection boxes the Postal Service uses density tests to determine the average volume of mail collected, including an annual national density test, which was last conducted over a 2-week period in August and September 2015.

Nationally the number of collection boxes declined by more than 12,000 in the past 5 years. Some customers have complained the Postal Service has gone too far, and most collection boxes, except those at the Post Office, have been removed. In addition, they have questioned whether any cost savings result from collection box removals.

The Eastern Area had 28,670 collection boxes on October 1, 2014, and removed 353 collection boxes through February 29, 2016. Reasons for the removals included safety, multiple boxes at a location, and canceled contracts with contract postal units. Other factors management took into account in removing boxes included the volume of mail collected, the proximity of other publicly accessible collection points, and the needs of customers in the vicinity of the box.

Summary

The Eastern Area's collection box removal process was not effective. While the area and its 10 districts had established procedures for removing or relocating collection boxes to respond to the collection needs of the communities, they were not consistently followed. Specifically, only 60 of the 6,371 underused business and residential collection boxes identified in the 2015 national density test were removed or relocated. However, our analysis indicates an additional 1,808 collection boxes could have been removed and another 637 relocated.

Furthermore, for the period October 1, 2014, through February 29, 2016, 213 collection boxes were deleted from the Collection Point Management System (CPMS) without Eastern Area approval and 322 out-of-service boxes were permanently removed from the street without Eastern Area approval or public notification to customers.

These conditions occurred because there was limited area and district oversight to approve and validate collection box removals or relocations. Also, officials did not continually review collection operations data to remove or relocate underused collection boxes to ensure efficient and economical operations. Finally, there were no procedures to consistently monitor collection boxes reported as out of service longer than 7 days.

As a result, the Postal Service may be incurring costs to collect from and maintain underused collection boxes that could be removed. We estimate removal of unnecessary collection boxes throughout the Eastern Area would eliminate 73,043 workhours over the next 5 years, for an average future cost avoidance of more than \$700,000 annually. In addition, relocating underused collection boxes to more visible, higher traffic, secure locations can better meet the needs of the customer to safely and easily access collection boxes.

Through our analysis and discussions with management, we estimate 1,808 business and residential collection boxes could have been removed from the Eastern Area and an additional 637 relocated.

Collection Box Removals

The Eastern Area's collection box removal process was not effective. While the area and its 10 districts had established procedures for removing and relocating collection boxes, they were not consistently followed. The area established an Eastern Area Collection Point Change Request form that must be completed and submitted to the area manager, Delivery Programs Support, for approval of any collection box removal decision. See Appendix B for a flowchart of the Eastern Area's collection box removal process.

The 2015 national density test identified 6,371 business and residential collection boxes that should have been evaluated for retention, relocation, or removal. The area only removed or relocated 60 of the underused collection boxes identified in the density test. Eastern Area and district management did not continually review collection operations to remove or relocate underused collection boxes. Through our analysis and discussions with management, we estimate 1,808 business and residential collection boxes could have been removed from the Eastern Area and an additional 637 relocated.

In addition, management removed 353 collection boxes from the CPMS database during our review period. However, a review of the available documentation showed 213 of the collection boxes (60 percent) removed by management were not properly approved by the Eastern Area (see Table 1).

Table 1. Removed Collection Boxes

| District | Collection Box Removals From CPMS | Insufficient Evidence of Area Approval | Percentage of Unsupported Removals |
|---------------------------|--------------------------------------|---|---------------------------------------|
| Appalachian | 0 | 0 | 0% |
| Central Pennsylvania | 0 | 0 | 0% |
| Kentuckiana | 10 | 0 | 0% |
| Northern Ohio | 202 | 202 | 100% |
| Ohio Valley | 18 | 2 | 11% |
| Philadelphia Metropolitan | 35 | 9 | 26% |
| South Jersey | 4 | 0 | 0% |
| Tennessee | 6 | 0 | 0% |
| Western New York | 65 | 0 | 0% |
| Western Pennsylvania | 13 | 0 | 0% |
| Total | 353 | 213 | 60% |

Source: U.S. Postal Service Office of Inspector General (OIG) analysis of Enterprise Data Warehouse (EDW) CPMS Blue Box Count Report and documentation of Eastern Area Collection Point Change Request forms.

¹ Eastern Area management removed or relocated 478 collection boxes during the 17-month period we reviewed, for safety, multiple boxes at a location, or canceled contracts with contract postal units.

Furthermore, as of April 5, 2016, 432 collection boxes had been placed in an out-of-service status in CPMS for more than a week,² and for an average duration of 399 days. In our analysis and discussions with district management, we determined 322 of these collection boxes (75 percent) had been permanently removed from the street without public notice to customers (see Table 2).

Table 2. Analysis of Number of Days Eastern Area Collection Boxes Placed in an Out-of-Service Status

In our analysis and discussions with district management, we determined 322 of these collection boxes (75 percent) had been permanently removed from the street without public notice to customers.

| District | Total Out-of-Service Collection Boxes More Than a Week | Average Duration Collection Boxes Were Out of Service (in Days) ³ | Collection Boxes Improperly Removed Without Area Approval | Percentage of Improper Removals |
|---------------------------|--|---|---|------------------------------------|
| Appalachian | 99 | 490 | 78 | 79% |
| Central Pennsylvania | 52 | 492 | 49 | 94% |
| Kentuckiana | 17 | 276 | 11 | 65% |
| Northern Ohio | 23 | 134 | 1 | 4% |
| Ohio Valley | 76 | 497 | 54 | 71% |
| Philadelphia Metropolitan | 974 | 189 | 69 | 71% |
| South Jersey | 35 | 425 | 30 | 86% |
| Tennessee | 11 | 453 | 9 | 82% |
| Western New York | 0 | 0 | 0 | 0% |
| Western Pennsylvania | 22 | 658 | 21 | 95% |
| Eastern Area Total | 432 | 399 | 322 | 75% |

Source: OIG analysis of CPMS out-of-service data and responses provided by Eastern Area district officials.

These conditions occurred for the following reasons:

Area and district management provided limited oversight of the collection box removal process. Area and district officials primarily used the Eastern Area Collection Point Change Request forms to manage box removals, but 60 percent of the removals were undocumented. For example, 202 Northern Ohio District collection boxes were removed from CPMS on September 14, 2015, without an Eastern Area Collection Point Change Request form submitted or approved by management. According to district officials, these boxes had previously been placed in an out-of-service status and were removed from the street for a variety

² Collection boxes are typically placed out of service for less than a week when the box is being replaced or repaired, or is inaccessible. According to postal headquarters and Eastern Area officials, collection boxes should not be out of service longer than a week; being out of service may indicate the box is being relocated or permanently removed.

This calculation includes only Eastern Area collection boxes out of service more than a week on April 5, 2015, and represents the number of days a collection box was out of service from the time it was placed out of service until the listing was generated on April 5, 2016.

We were unable to draw any conclusion for six of the 97 collection boxes in the Philadelphia Metropolitan District because the district could not provide any information or documentation related to: the original rationale for placing the boxes out of service; the reason these boxes have been out of service more than a week; whether or not these boxes have been physically removed; the date boxes were or will be placed back into service; or Eastern Area Collection Point Change Request forms for boxes that were permanently removed.

of reasons. Additionally, removal of one collection box from the Philadelphia Metropolitan District was approved and the box was removed from CPMS, but the box was not removed from the street for more than a year, until the OIG inquired about its status. Postal Service policy states that prompt, economical, and efficient services should be provided which are responsive to the needs of the communities⁵ served and management must follow an established process to implement change.⁶

- Area and district management established collection box removal processes, but discouraged collection box removals unless there were multiple boxes at a location. In addition they did not validate that collection operations were periodically reviewed by local management. Area and district officials stated local postmasters and officers in charge should periodically review underused collection boxes and determine whether collection boxes should be retained, removed, or relocated. However, they had not established any controls to ensure these reviews were taking place. Postal Service policy states, management should continually review collection operations, and make adjustments that are justified by changing conditions such as the safety and security of employees, customers, and the public, and by opportunities to implement more efficient and economical operations.⁷
- Area and district management did not use available tools, such as the annual density study, to identify and implement more efficient and economical collection box operations. Area and district officials stated the annual collection box density test was not used as an indicator to review boxes for possible removal or relocation. Instead, most removal decisions were based on safety concerns, or because there were multiple boxes at a location, or contracts with contract postal units were canceled. Postal Service policy states that management should take action on collection boxes receiving an average of fewer than 25 pieces a day⁸ and relocate the boxes to potentially higher volume locations within communities and neighborhoods.⁹
- Area and district management had not established procedures to adequately monitor collection boxes that have been placed into an out-of-service of status for more than a week to ensure they were returned to service or timely and properly approved for removal or relocation. With the exception of the Western New York District, area and district officials did not routinely monitor out-of-service boxes to ensure they were returned to service within a week. Management stated that most of these boxes were emergency removals that were meant to be temporary in nature; however, management no longer plans to replace them. Management also indicated that several boxes had been returned to service, but CPMS had not been updated to reflect the change in status. Postal Service policy requires that if a collection box will be removed or relocated, a notice to that effect for customers must be placed on the box 30 days prior to the removal or relocation showing the locations and collection schedules for other collection points in the vicinity. The Postal Service policy was updated on December 24, 2015, to also state, "If, after a collection box has been vandalized or tampered with, the location is determined to be unsecured by the area manager, Delivery Programs Support, the box may be removed immediately without notice" and that the "area manager, Delivery Programs Support, must authorize all collection box removals."

⁵ Postal Operations Manual Issue 9, July 2002, updated with Postal Bulletin revisions through December 24, 2015, Section 313.11.

⁶ Collection Point Guidebook, March 2012.

⁷ Postal Operations Manual Issue 9, July 2002, updated with Postal Bulletin revisions through December 24, 2015, Section 313.12.

⁸ Postal Operations Manual Issue 9, July 2002, updated with Postal Bulletin revisions through December 24, 2015, Section 315.3 states a 2-week density test and analysis must occur at least annually. Boxes adjacent to senior citizen housing, municipal and judicial buildings, and other public facilities are examples of the types of boxes that may be left in place even if fewer than 25 pieces per day are generated.

⁹ Postal Operations Manual Issue 9, July 2002, updated with Postal Bulletin revisions through December 24, 2015, Section 315.3.

¹⁰ Collection boxes are placed in an out-of-service status if they are damaged and awaiting repair, removed for a parade, or cannot be collected due to unusual circumstances. According to Postal Service officials, collection boxes should not be placed out of service for longer than a week.

¹¹ Collection boxes were removed due to safety concerns, construction, damage to the box, customers' requests to remove boxes from their premises, or contract postal unit closures.

¹² Postal Operations Manual Issue 9, July 2002, Updated With Postal Bulletin Revisions Through October 15, 2015, Section 315.4.

¹³ Postal Operations Manual Issue 9, July 2002, Updated With Postal Bulletin Revisions Through December 24, 2015, Section 315.4.

¹⁴ Postal Operations Manual Issue 9, July 2002, Updated With Postal Bulletin Revisions Through December 24, 2015, Section 315.4.

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Recommendations

We recommend management
evaluate underused collection
boxes identified in annual
density tests for relocation or
removal, maintain supporting
documentation for removal and
relocation decisions, and monitor
out-of-service collection boxes.

We recommend the vice president, Eastern Area:

- 1. Require each district to periodically evaluate underused collection boxes, identified in the national annual density tests, for relocation or removal, where appropriate.
- 2. Require that district officials maintain supporting documentation for removal and relocation decisions, for a minimum of 2 years.
- 3. Establish a process to monitor out-of-service collection boxes, including obtaining approvals and public notification.

Management's Comments

Management agreed with the findings, recommendations, and that a monetary impact exists. However, management believes that the number of boxes suggested by the OIG for removal would be considerably less and decrease the monetary savings opportunity when considering Postal Service policy. Management cited the Postal Operations Manual which states that before removing a collection point, it must be considered for relocation within the neighborhood to a potentially higher volume location. Also, collection boxes adjacent to senior citizen housing, municipal and judicial buildings, and other public facilities are examples of the types of boxes that may be left in place even if fewer than 25 pieces per day are generated.

In response to recommendation 1, management stated they have established a standard of work for districts to request collection box removals and relocations and to evaluate underused collection boxes.

In response to recommendation 2, management stated this has been an ongoing requirement in the Eastern Area. The districts are expected to maintain supporting documentation for removal, relocation, and time changes for a minimum of 2 years.

In response to recommendation 3, management stated they have requested the CPMS program be upgraded to allow analysts to extract the data necessary to monitor out-of-service collection boxes. Currently the reports that are available through CPMS do not offer such data at the area level.

In subsequent correspondence and discussions, management stated they will also issue an Eastern Area out-of-service collection box standard operating procedure and provided an estimated completion date for all recommendations by August 19, 2016.

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

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations in the report and corrective actions should resolve the issues identified in the report.

In regard to the workhour savings and monetary impact, our estimate of 1,808 business and residential collection boxes that could have been removed from the Eastern Area was based on analysis and discussions with district management. In addition to removal, the analysis considered keeping the collection box in its current location, as well as relocating the box within the neighborhood. We estimated 637 collection boxes should be relocated within the Eastern Area. We believe this is a conservative estimate and accurately reflects the number of underused collection boxes that can be removed from the district.

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

Background

Collection boxes were first introduced in 1858. The boxes originally had a number of purposes including serving as storage facilities for carriers who made their rounds on foot, holding items such as rain gear and coats. However, now that most carriers have vehicles, the gear is in the delivery vehicle and the mailboxes are used primarily to collect mail. The number of collection boxes has declined by more than 12,000 over the past 5 years. The following table shows an analysis of collection box removals for the past 5 fiscal years (FY) (see Figure 1).

Number of Collection Boxes 200,000 150,000 100,000 50,000 FY 2014 FY 2015 FY 2013 FY 2012 FY 2011 Fiscal Year Collection Box Totals 153,999 156,345 159,729 164,099 166,461 ■ Collection Boxes removed from 2,346 3,384 4,370 2,362 last year's total

Figure 1. Analysis of Collection Box Removals

Source: FY 2011 through FY 2015 Postal Regulatory Commission Annual Compliance Determination Reports.

Collection points are locations where a customer drops off mail for collection by the Postal Service. These boxes are an important access channel for single-piece First-Class Mail. They can include collection boxes, mail chutes, firm pickups, self-service kiosks, lobby drops, and mail collection racks. Each district is required to enter all collection points within its boundaries into Collection Point Management System (CPMS), a database that includes collection point addresses, location types (such as business, residential, or Post Office lobby), box types (such as standard, jumbo, or snorkel), days of the week the point is accessed, and the times it is accessed, including the final collection time. Collection boxes are a subset of collection points.

Our analysis of Eastern Area collection boxes identified 28,670 collection boxes as of October 1, 2014. About 27 percent (7,742 boxes) were located outside of or within a Post Office. The remaining 73 percent (20,928 boxes) were located throughout the communities, mostly in business or residential areas (see Figure 2).

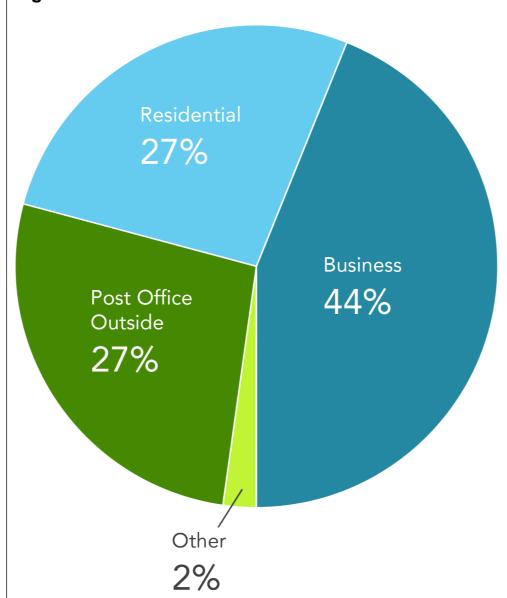


Figure 2. Eastern Area Collection Box Locations

Source: Postal Service EDW CPMS Blue Box Count Report.

CPMS is a nationwide database that manages information pertaining to all collection points, including Postal Service regular and Express Mail collection points. CPMS provides a user interface that facilitates the entry and modification of data in the database while providing other services such as printing collection box labels. The national database is a major source of information for management review and analysis of trends affecting collection boxes throughout the Postal Service. It is also made available as a resource for auditing firms that perform independent audits of Postal Service customer service. The basic building block of the national database is the information provided by each district.

In order to identify which boxes are underperforming, a Postal Service employee conducts a density check that involves counting pieces of mail per day over a period of 2 weeks. According to the *Postal Operations Manual*, if a mailbox is not receiving an average of 25 pieces per day, the Postal Service may remove it. The Postal Service is required to post a 30-day notice on the box before it is removed, and customers are invited to comment.

Objective, Scope, and Methodology

Our objective was to assess the collection box removal process in the Eastern Area. To accomplish our objective, we:

- Reviewed and evaluated criteria and procedures related to mail collection box removals.
- Selected the Eastern Area for review, based on the results of the most recent nationwide collection box density test conducted during a 2-week period in August and September 2015, which indicated the Eastern Area had the most residential and business collection boxes with less than 25 letters a day.
- Met with the Postal Service Headquarters manager, Delivery Strategy & Planning, senior delivery specialists, and the Eastern Area manager, Delivery Programs Support, to gain a better understanding of national and Eastern Area collection box removal processes.
- Obtained, reviewed, and analyzed collection box data from CPMS to identify Eastern Area collection boxes removed and relocated in FYs 2015 and 2016 through February 29, 2016, and collection boxes in an out-of-service status for 7 days or more as of April 5, 2016.
- Selected a sample of 228 of the 6,371 Eastern Area underused business and residential collection boxes for review and determined 29 percent of the collection boxes in our sample should have been removed and 11 percent should have been relocated.
- Conducted site visits to the Eastern Area and the Western Pennsylvania and Northern Ohio districts and interviewed the 10 Eastern Area districts about their collection box processes. We obtained supporting documentation, and reviewed district and local management's analysis of underused collection boxes, out-of-service collection boxes, and removal or relocation decisions.
- Obtained, reviewed, and analyzed collection time data from Postal Service Form 3999 "Inspection of Letter Carrier Route" and interviewed Postal Service Headquarters senior maintenance specialist and district officials to gain an understanding of the labor and maintenance costs associated with collecting mail and the cost of removing collection boxes.
- Discussed results of the audit with Postal Service management, including the vice president, Eastern Area Operations.

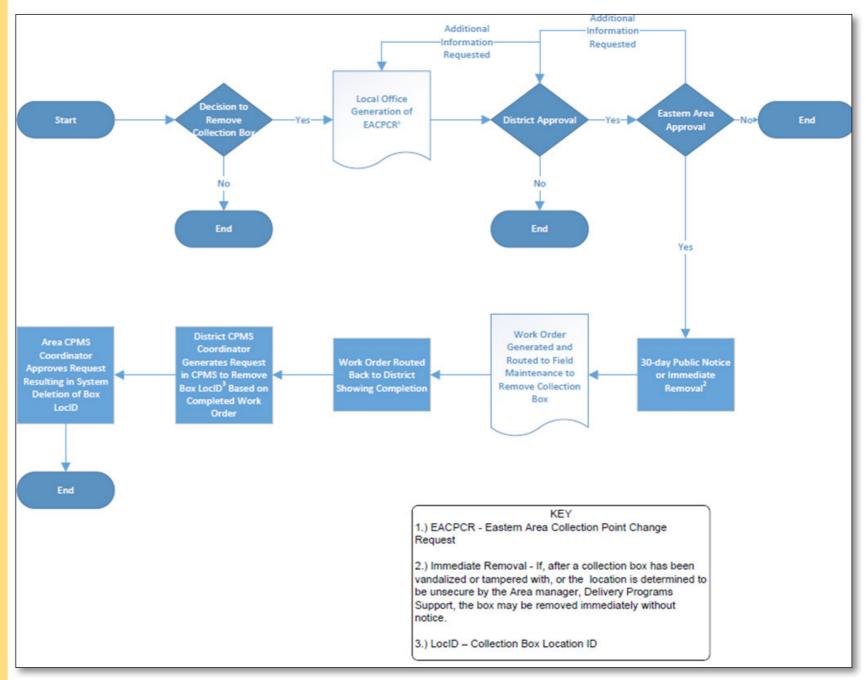
We conducted this performance audit from February through August 2016 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain 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 July 14, 2016, and included their comments where appropriate.

We assessed the reliability of the CPMS data by interviewing agency officials knowledgeable about the data and conducting limited data testing. Specifically, we requested and reviewed supporting documentation for collection boxes removed and relocated during the review period. Lastly, we compared the density results from our statistical sample of underused boxes to prior year (FY 2014) densities for reasonableness. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

We did not identify any prior audits or reviews related to the objective of this audit.

Appendix B: Flowchart of Eastern Area Collection Box Removal Process



Source: OIG analysis.

Appendix C: Management's Comments

JOSHUA D. COLIN, PH.D. VICE PRESIDENT, AREA OPERATIONS EASTERN AREA



DATE: August 9, 2016

Sherry Fullwood Office of Inspector General Acting Director Audit Operations

SUBJECT: Collection Box Removal Process Eastern Area

The Eastern Area agrees with the findings, recommendations, and that a monetary impact exists however; we must consider section 315.3 of the POM Relocation Before Removal which states collection boxes averaging less than 25 pieces a day should be relocated within the neighborhood or community to a potentially higher volume location. Boxes adjacent to senior citizen housing, municipal and judicial buildings, and other public facilities are examples of the types of boxes that may be left in place even if fewer than 25 pieces per day are generated. Before removing a collection point, it must be considered for relocation within the neighborhood. With this in mind we believe the number of boxes suggested by the OIG for removal would be considerably less which would then decrease the monetary savings opportunity. Additionally, the Eastern Area is in full support of recommendation #3 regarding establishing a process to monitor out-of-service collection boxes however; the CPMS program does not provide the access necessary to monitor out-of-service collection boxes. During the audit the Eastern Area team requested that upgrades to the CPMS program be implemented to provide more robust reports.

Recommendations

 Require each District to periodically evaluate underused collection boxes, identified in the national annual density tests, for relocation or removal, where appropriate.

Managements Response:

The Eastern Area has established a Standard of Work for Districts to request collection box removals and relocations and to evaluate underused collection boxes.

5315 CAMPBELLS RUN RD PITTSBURGH PA 15277-7010 PHONE: 412-494-2510 FAX: 412-494-2582 Require that district officials maintain supporting documentation for removal and relocation decisions, for a minimum of 2 years.

Managements Response:

This has been an ongoing requirement in the Eastern Area. The districts are expected to maintain supporting documentation for removal, relocation and time changes for a minimum of 2 years.

Establish a process to monitor out-of-service collection boxes, including obtaining approvals and public notification

Managements Response:

The Eastern Area has requested the CPMS program to be upgraded to allow analysts to extract the data necessary to monitor out-of-service collection boxes. Currently the reports that are available through CPMS do not offer such data at the Area Level.

The Area has reviewed the report and has not identified any portions that need to be exempt under FOIA.

Respectfully,

Joshua D. Colin, Ph.D.

5315 CAMPBELLS RUN RD PITTSBURGH PA 15277-7010 PHONE: 412-494-2510 FAX: 412-494-2582



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