September 21, 2004

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SUBJECT: Audit Report – Summary Report on the Efforts to Prevent Accidents, Injuries, and Illnesses in 12 Performance Clusters (Report Number HM-AR-04-012)

This report presents the summary of our nationwide self-initiated audits of the efforts to prevent accidents, injuries, and illnesses in 12 performance clusters located in six areas (2 performance clusters each) of operation (Project Number 03YG011LH000). Our overall objective was to determine whether the performance clusters were reducing the number of accidents, injuries, and illnesses through prevention methods. This report summarizes the conditions reported in the 12 performance clusters, and focuses on management's actions taken or planned to correct the issues identified and implement recommendations made in our reports. This report also includes the results of our best practices review of safety issues. This capping report is the seventh and final report in a series of reports we have issued regarding accident prevention initiatives.

The 12 performance clusters have implemented prevention initiatives that can become best practices in reducing accidents, injuries, and illnesses. For example, the Arkansas and Mississippi Performance Clusters implemented a strobe light program to reduce motor vehicle accidents. The Mid-America and Oklahoma Performance Clusters implemented initiatives to prevent slips, trips, and falls due to icy conditions. In addition, the Oakland Performance Cluster implemented mapping software to identify problem sites for motor vehicle accidents.

Three of the 12 performance clusters were reducing accidents, injuries, and illnesses through prevention initiatives, and implemented initiatives in a timely manner. However, we could not determine if this was the case at the remaining nine clusters because the safety tool kit did not allow personnel to track and monitor the effectiveness of specific initiatives or document when initiatives were implemented. Postal Service Headquarters officials took corrective action by

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changing the safety tool kit to allow safety managers to monitor and track preventive initiatives for effectiveness.

We noted opportunities for improvement in three performance clusters, in the areas of resources/safety staffing and safety training. District management were responsive to the recommendations and provided planned or completed actions, which should correct the issues.

The 36 facilities we visited in the 12 performance clusters were accumulating and analyzing accident, injury, and illness data for prevention initiatives. However, two performance clusters generated reports from the Human Resources Information Systems and the Risk Management Reporting System that were inconsistent with one another, and did not provide an efficient method of analyzing data for prevention initiatives. Both systems are antiquated and Postal Service Headquarters officials said the Injury Compensation Performance Analysis System will replace certain components of both systems commencing in calendar year 2005.

All 36 facilities we visited in the 12 performance clusters used reporting processes within various functional areas that facilitated accurate reporting of accidents, injuries, and illnesses. However, several facilities in one performance cluster can improve their completion of accident report forms. The District Manager agreed with our recommendation and the planned action should correct the issue.

Further, we identified best practices used by seven private companies that could help the performance clusters measure the effectiveness of accident prevention initiatives.

We commend the Postal Service and the American Postal Workers Union on their agreement to promote the Occupational Safety and Health Administration's Voluntary Protection Program that will enhance worker safety and health. We also commend the Postal Service and the National Association of Letter Carriers for their efforts in piloting an ergonomic risk reduction process for letter carriers in Albany, New York. In addition, at the national level, they have established a task force to pilot the Joint Safety and Health Committees to focus on reducing injuries specific to letter carriers.

Two of the six reports included four recommendations to officials in two areas of operation (three performance clusters). Officials agreed with the recommendations and provided corrective actions taken or planned, which we considered responsive. Management's comments and our evaluation of these comments are included in this report.

Management stated they had no disagreements with our report. Management also stated it is their opinion that the audit team delivered a balanced report and they appreciate the cooperation and courtesies that were afforded to their field and headquarters' managers and staffs by the audit team.

We appreciate the cooperation and courtesies provided by your staff during the audit. We are especially appreciative of Mr. Samuel M. Pulcrano, who worked with the audit team to ensure successful completion of our work. If you have any questions, or need additional information, please contact Chris Nicoloff, Director, Human Capital, or me at (703) 248-2300.

/s/ Mary W. Demory

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EXECUTIVE SUMMARY

Introduction

This report summarizes the results of our self-initiated audit to determine whether 12 performance clusters, located in 6 Postal Service areas of operation, were reducing the number of accidents, injuries, and illnesses through prevention initiatives. In addition, we identified best practices used by seven private companies that could help the performance clusters measure the effectiveness of accident prevention initiatives.

Results in Brief

The 12 performance clusters in 6 areas have implemented prevention initiatives that can become best practices in reducing accidents, injuries, and illnesses. For example, Arkansas and Mississippi implemented a strobe light program to reduce motor vehicle accidents. Mid-America and Oklahoma implemented initiatives to prevent slips, trips, and falls due to icy conditions. In addition, Oakland implemented mapping software to identify problem sites for motor vehicle accidents. (See Appendix E for a list of the performance clusters and their initiatives.)

Three of the twelve performance clusters were reducing accidents, injuries, and illnesses, through prevention initiatives, and implemented initiatives in a timely manner. However, we could not determine at the remaining nine clusters, if the prevention initiatives reduced the number of accidents, injuries, and illnesses, or if the initiatives were implemented in a timely manner. This occurred because the safety tool kit did not allow safety personnel to:

- Track and monitor the effectiveness of specific prevention initiatives.
- Document when initiatives were implemented.

Postal Service Headquarters officials took corrective action by changing the safety tool kit to allow safety managers to monitor and track prevention initiatives for effectiveness.

We noted opportunities for improvement in three performance clusters, in the areas of resources/ safety staffing and safety training. District management were responsive to the recommendations and provided planned or completed actions, which should correct the issues.

In addition, the 36 facilities we visited in the 12 performance clusters were accumulating and analyzing accident, injury, and illness data for prevention initiatives. However, two performance clusters generated reports from the Human Resources Information Systems (HRIS) and the Risk Management Reporting System (RMRS) that were inconsistent with one another, and did not provide an efficient method of analyzing data for prevention initiatives. Both systems are antiquated and Postal Service Headquarters officials told us the Injury Compensation Performance Analysis System will replace certain components of HRIS and RMRS commencing in calendar year 2005.

All 36 facilities in the 12 performance clusters used reporting processes within various functional areas that facilitated accurate reporting of accidents, injuries, and illnesses. However, several facilities in one performance cluster can improve their completion of accident report forms. The District Manager agreed with our recommendation and the planned action should correct the issue. (See Appendix C for a list of the general findings in the 12 performance clusters.)

There was also a safety carrier issue at one facility and the District Manager took corrective action.

Further, we identified best practices[1] used by seven private companies that could help the performance clusters measure the effectiveness of accident prevention initiatives. (See Appendix H for a profile of the seven companies.)

We commend the Postal Service and the American Postal Workers Union on their agreement to jointly promote the Occupational Safety and Health Administration's Voluntary Protection Program that will enhance worker safety and health. We also commend the Postal Service and the National Association of Letter Carriers for their joint efforts in piloting an ergonomic risk reduction process for letter carriers in Albany, New York. In addition, at the national level, they have established a task force to pilot the Joint

[1] The American Productivity and Quality Center Benchmarking Terms stated, "There is no single "best practice" because best is not best for everyone. Every organization is different in some way. What is meant by "best" are those practices that have been shown to produce superior results, selected by a systematic process, and judged as exemplary, good, or successfully demonstrated. Best practices are then adapted to fit a particular organization."

	Safety and Health Committees to focus on reducing injuries specific to letter carriers.
Summary of Management's Comments	Management stated they had no disagreements with the draft version of this report. Management also stated it is their opinion that the audit team delivered a balanced report and they appreciate the cooperation and courtesies that were afforded to their field and headquarters' managers and staffs by the audit team. Management's comments, in their entirety, are included in Appendix I of this report.

INTRODUCTION

Background

With responsibility for more than 38,000 facilities, major transportation networks, and universal delivery, the Postal Service faces significant challenges in the areas of health and safety. These include making the health and safety of Postal Service employees a priority, managing the associated costs and lost productivity in operations, and responding when accidents and injuries have an unfavorable impact on the workplace. In addition, the Postal Service must address citations and monetary penalties for noncompliance with Occupational Safety and Health Administration (OSHA) standards.

In its April 2002, Transformation Plan, the Postal Service stated that to meet its challenges and prepare for transformation, it would implement a number of strategies to "push business effectiveness and operational efficiency." One of the strategies outlined was to reduce its workers' compensation costs. According to the Office of Workers' Compensation Programs' (OWCP) chargeback[1] reports, the Postal Service workers' compensation costs have increased from $538 million to $830 million between chargeback years 1997 and 2004.[2]

The following table is a comparison of Postal Service-wide accidents[3] and OSHA injuries and illnesses[4] for fiscal years (FY) 2002 and 2003, which shows decreases in four categories. In addition, total expenses in FY 2003 decreased significantly.

[1] The OWCP's chargeback system is the mechanism by which the Department of Labor annually bills the cost of compensation for work-related injuries and deaths to employing agencies.
[2] The OWCP's chargeback year is July 1 through June 30.
[3] The Postal Service considers accidents as all reportable and nonreportable incidents, including unadjudicated occupational illness cases that cover certain kinds of injuries, illnesses, or damages. OSHA defines an accident as any unplanned event that results in personal injury or property damage.
[4] OSHA defines an injury or illness as an abnormal condition or disorder. Injuries include, but are not limited to, cuts, fractures, sprains, or amputations. Illnesses include both acute and chronic illnesses such as, but not limited to skin diseases, respiratory disorders, or poisoning.

Table 1. Comparison of Postal Service-wide Accidents and OSHA Injuries and Illnesses, FYs 2002 and 2003

Category	FY 2002	FY 2003
Motor Vehicle Accidents	23,404	23,100
Non-Motor Vehicle Accidents	99,195	93,251
OSHA Injuries	51,630	46,317
OSHA Illnesses	6,972	5,550
Total Accident, Injury, and Illness Expenses	$1,652,449,865	$1,620,024,027

Source: Postal Service Web-Enabled Enterprise Information System (WebEIS).

The average total OSHA injury and illness and accident frequency rates for the 12 performance clusters we visited are shown in the table below.

Table 2. Average Total OSHA Injury and Illness Rates and Accident Frequency Rates, FYs 2002 and 2003

Performance Cluster	Average Total OSHA Injury and Illness Frequency Rates	Average Total Accident Frequency Rates*
Arkansas	5.70	14.50
Chicago	6.15	10.51
Greater Indiana	8.71	21.12
Long Island	9.39	17.11
Los Angeles	5.70	11.10
Mid-America	5.40	15.80
Mississippi	4.33	11.86
New York	4.23	9.69
Oakland	9.30	20.40
Oklahoma	9.0	18.90
Salt Lake City	8.80	23.80
Suncoast	8.30	18.73

Source: Postal Service WebEIS.

*** This column indicates the average number of employees out of every 100 employees that had an accident during a specific period.**

Postal Service Headquarters officials stated that accident reduction initiatives and accident reduction communications are responsible for the reduction in accidents. They also said the core headquarters' accident reduction initiatives require every district to complete and implement an accident reduction plan for each of the eight targeted reduction areas.

To determine why the number of accidents, injuries, and illnesses declined, we conducted a survey of accident prevention initiatives in the Postal Service's Western New York and Baltimore Performance Clusters, located in the Northeast and Capital Metro Areas, respectively. Our results showed that accident prevention initiatives in each performance cluster were different and yielded contrasting results.

We conducted this audit to determine whether similar situations existed in 12 performance clusters located in 6 areas of operation (2 performance clusters each). We did not audit the performance clusters' overall safety programs. Our focus was on accident prevention initiatives at the locations we visited.

This report summarizes our review of accident prevention initiatives reported in the 12 performance clusters. Appendix B is a list of six reports we issued. Appendix C shows each of the performance clusters and the general findings in each cluster.

Objectives, Scope, and Methodology

Our overall objective was to determine if the 12 performance clusters were reducing the number of accidents, injuries, and illnesses through prevention initiatives. Our four subobjectives were to determine whether:

- The number of accidents and injuries were declining as a result of corrections to unsafe working conditions and practices.[5]
- Corrective actions and/or prevention initiatives were made in a timely manner.
- Data were being accumulated and analyzed for prevention initiatives.
- Processes facilitated accurate reporting.

[5] Corrections to unsafe working conditions and practices were considered both corrective actions and prevention initiatives. The purpose of this subobjective was to determine the effectiveness of prevention initiatives.

A second objective was to identify best practices to help the performance clusters measure the effectiveness of accident prevention initiatives.

We discuss our scope and methodology in Appendix D.

Prior Audit Coverage

In the 12 performance clusters, we did not identify any prior audits or reviews related to the objectives of this audit.

AUDIT RESULTS

The 12 performance clusters have implemented accident prevention initiatives that have the potential to become best practices. In three performance clusters (Arkansas, New York, and Oklahoma), data showed the reduction in the number of accidents, injuries, and illnesses was the result of prevention initiatives. Also, in three performance clusters (Arkansas, Long Island, and Oklahoma), initiatives were implemented in a timely manner. We did not evaluate, however, the timeliness of prevention initiatives in one performance cluster (New York) because new initiatives were not implemented during the audit scope. We could not determine whether the remaining performance clusters were reducing the number of accidents, injuries, and illnesses through prevention initiatives, or whether the initiatives were implemented in a timely manner.

We also noted opportunities for improvement in the areas of resources/safety staffing and safety training in the Long Island, New York, and Salt Lake City Performance Clusters.

In addition, all 36[6] facilities visited in the 12 performance clusters, were accumulating and analyzing accident, injury, and illness data for prevention initiatives in two different automated systems. However, two performance clusters generated reports from both systems that did not always reconcile. The Postal Service recognizes both systems are antiquated and there are plans to replace them. See Appendix G for a list of the 36 facilities visited.

Also, the reporting processes used within the various functional areas in all 36 facilities, facilitated accurate reporting of accidents, injuries, and illnesses. However, we noted opportunities for improvement in the Mississippi Performance Cluster.

There was also a safety carrier issue at one facility and the District Manager took corrective action.

[6] We visited three facilities in each of the 12 performance clusters.

Further, we identified several best practices[7] used by seven private companies that could help the performance clusters measure the effectiveness of accident prevention initiatives.

We commend the Postal Service and the American Postal Workers Union (APWU) on their agreement to jointly promote the OSHA Voluntary Protection Program (VPP) that will enhance worker safety and health. We also commend the Postal Service and the National Association of Letter Carriers (NALC) for their joint efforts in piloting an ergonomic risk reduction process for letter carriers in Albany, New York. In addition, at the national level, the Postal Service and the NALC have established a task force to pilot the Joint Safety and Health Committees to focus on reducing injuries specific to letter carriers.

Accident Prevention Initiatives Have Potential to Become Best Practices

The 12 performance clusters' prevention initiatives have the potential to become best practices in reducing accidents, injuries, and illnesses. These initiatives could also help other performance clusters to enhance their safety programs. For example, the Arkansas and Mississippi Performance Clusters implemented a strobe light program to reduce motor vehicle accidents. Mid-America and Oklahoma implemented initiatives to prevent slips, trips, and falls due to icy conditions. In addition, the Oakland Performance Cluster implemented mapping software to identify problem sites for motor vehicle accidents. A list of prevention initiatives in each performance cluster is included in Appendix E of this report.

Postal Service Headquarters officials stated they will review and evaluate the accident prevention initiatives contained within the six final area reports, and post those activities demonstrating significant contribution to accident reduction within the "Best Practice" section of the Postal Service's safety tool kit.[8]

[7] The American Productivity and Quality Center Benchmarking Terms stated, "There is no single "best practice" because best is not best for everyone. Every organization is different in some way. What is meant by "best" are those practices that have been shown to produce superior results, selected by a systematic process, and judged as exemplary, good, or successfully demonstrated. Best practices are then adapted to fit a particular organization."

[8] The Safety Tool Kit is a Web-based application available for use by safety managers, Postal Service-wide, to assess their safety programs.

The Mississippi and Suncoast District Managers, stated they will continue their efforts in accident prevention through hazard assessments and site-specific initiatives while maintaining their focus on headquarters mandated, target specific, action plans. The Suncoast District Manager, stated his district will continue to establish action plans as needed, monitor for trends and results, and implement necessary activities.

The Manager, Oakland District, stated the district implemented programs/activities that were both area and district driven which they believe are best practices. Management also stated the overall number of accidents has decreased, but it is too soon to determine if there is a direct correlation between the implemented programs/activities and the improved performance. They are confident; however, with the current progress of their programs and the impact they are having in reducing the number of accidents.

Effectiveness of Prevention Initiatives Unknown

For FYs 2002 and 2003, 3 of the 12 performance clusters (Arkansas, New York, and Oklahoma) were reducing accidents, injuries, and illnesses through prevention initiatives. For example, the New York District Office, in the New York Metro Performance Cluster, measured the effectiveness of its driver improvement training program, which indicated that 90 percent of those receiving the training had no subsequent motor vehicle accidents. In addition, the Oklahoma Performance Cluster implemented a mobile driving course in September 2002 and experienced a substantial decrease in preventable motor vehicle accidents from 52 to 34 (35 percent reduction) as of September 2003.

We could not determine whether the remaining 9 performance clusters (Chicago, Greater Indiana, Long Island, Los Angeles, Mid-America, Mississippi, Oakland, Salt Lake City, and Suncoast) were reducing the number of accidents, injuries, and illnesses through prevention initiatives. We could not make this determination because the safety tool kit did not allow safety managers to track and monitor specific prevention initiatives.

Although some categories of accidents (slips, trips, falls, and lifts) had decreased in the nine performance clusters, the reasons for the decreases could not be determined. District safety personnel told us they did not think decreases in the number of accidents were related to specific prevention initiatives.

All 12 performance clusters had implemented several accident prevention initiatives for FYs 2002 and 2003; however, their numbers and frequency rates[9] varied for OSHA injuries and illnesses and motor vehicle accidents. For example, Long Island's OSHA injury and illness and motor vehicle accident numbers and frequency rates increased. Conversely, Arkansas, Chicago, Greater Indiana, New York, Oklahoma, Salt Lake City, and Suncoast numbers and rates decreased. The remaining 4 (Los Angeles, Mid-America, Mississippi, and Oakland) performance clusters' OSHA injury and illness and motor vehicle accident numbers and rates increased, decreased, or stayed about the same. See Appendix F for these and other changes.

Postal Service policy[10] states that safety personnel are responsible for developing and monitoring a comprehensive safety and health program and analyzing accident, injury, and illness data so they can advise management on corrective actions. Policy[11] also requires installations to develop methods to identify program needs for accident preventions. In addition, policy[12] requires supervisors to implement written programs and action plans, monitor employees' safety performance, and prevent operational safety accidents.

Without adequate measurement tools, the Postal Service does not have reasonable assurance that prevention initiatives help the performance clusters reduce the number of accidents, injuries, and illnesses. To follow prudent business practices, Postal Service managers should evaluate whether prevention initiatives are accomplishing

[9] OSHA injury and illness and motor vehicle accident frequency rates are the number of accidents per 100 employees for a specific period of time. These rates provide measurements that make accident data comparable between large and small facilities.
[10] Employee and Labor Relations Manual 17.2, Section 813.31, February 2003.
[11] Employee and Labor Relations Manual 17.2, Section 821.32, February 2003.
[12] Supervisor's Safety Handbook, Handbook EL-801, Chapter 1, Section 1-1, May 2001.

their goal and whether the resources expended are justified.

Southwest Area management stated the report accurately reflects the level of attention and focus that both District Managers (Arkansas and Oklahoma) give to protecting the Postal Service's most valuable assets from job-related injuries. They stated that both performance clusters use *CustomerPerfect!*[13] a data-driven process that closely aligns with the organization's core values, to determine the causes of accidents and the gaps in processes. Management stated these activities are routinely validated through internal and external sources in the form of program evaluations and leadership business reviews.

Western Area management agreed that although accident reductions in the Mid-America and Salt Lake City Performances Clusters were realized, it is difficult to determine whether the specific safety initiatives implemented were the reason for improved performance. They believed each performance cluster implemented programs based on periodic reports and queries that identified specific weaknesses. They stated, however, that unfortunately, neither cluster was able to provide dated reports or meeting minutes linking the weaknesses with the exact implementation date of an initiative and the related reduction. This shortcoming should be resolved once the clusters enter implementation and completion dates for initiatives, in the safety toolkit.

Corrective Action Taken	Headquarters officials modified the safety tool kit on April 22, 2004, to include trend line charts that will allow safety managers to track and monitor specific prevention initiatives. We believe this action is responsive and should correct the issue identified.

[13] *CustomerPerfect!* was implemented to help the Postal Service to meet the challenges of an increasingly competitive environment.

Timeliness of Prevention Initiatives Unknown

For FYs 2002 and 2003, 3 of the 12 performance clusters (Arkansas, Long Island, and Oklahoma) implemented prevention initiatives in a timely manner. For example, Arkansas purchased orange warning sticks for long-life vehicles in 2000 and their useful life was three years. The performance cluster began replacing these in the spring of 2003 and finished by the end of the year. In addition, the Long Island Performance Cluster initiated action to "champion" poorly performing units immediately after they established a pattern of poor performance in March 2003.

We did not evaluate the timeliness of preventive initiatives in one performance cluster (New York) because new initiatives were not implemented during the audit scope, which began September 8, 2001, and ended July 31, 2003. For the remaining eight performance clusters, (Chicago, Greater Indiana, Los Angeles, Mid-America, Mississippi, Oakland, Salt Lake City, and Suncoast) we could not determine whether prevention initiatives were implemented timely because the safety tool kit did not allow safety managers to document when initiatives were implemented.

District safety personnel at four of the performance clusters (Chicago, Greater Indiana, Mississippi, and Suncoast) confirmed that facility managers are responsible for documenting when prevention initiatives are implemented.

The Manager, New York District, stated during September 8, 2001, through July 31, 2003, several prevention initiatives were in place. He stated the changes implemented before September 8, 2001, have proven their value over time, and the district continues to include them in their accident reduction plans. Management provided the following list of initiatives:

- A weekly review of district accidents by a review board.
- An Accident Awareness Prevention Training Program.
- A Driver Improvement Training Program.
- A Safety Captain Program.
- The establishment of safety and health committees for facilities with 50 or more employees.

	We agreed the Long Island Performance Cluster implemented prevention initiatives, and we provided an example in the Accident Prevention Initiatives section of the report. See Appendix E of this report for a list of the prevention initiatives.
Corrective Action Taken	Postal Service Headquarters officials modified the safety tool kit on April 22, 2004, to include a field for managers to enter the implementation and completion dates for prevention initiatives. Both dates are also visible on trend line charts for each specific initiative. This action is responsive and should correct the issue identified.
Opportunities for Improvement – Resources/Safety Staffing	In determining both the effectiveness and timeliness of prevention initiatives, we noted opportunities for improvement in the Long Island, New York, and Salt Lake City Performance Clusters. Specifically, there may not be sufficient safety staff to support effective accident prevention programs. The Mid-Island Processing and Distribution Center, in the Long Island Performance Cluster, with approximately 2,400 employees, had one safety specialist assigned. The Long Island Priority Mail Processing Center had no on-site safety specialists assigned. Although it had a smaller employee complement (approximately 400 employees), the District Safety Specialist who serviced the center also provided support for 40 other facilities within the performance cluster. The Morgan Processing and Distribution Center, in the New York Performance Cluster, operates 24 hours a day, seven days a week, with over 4,000 employees and is authorized two safety specialists. However, only one specialist was assigned at the time of our visit.[14] The Franklin D. Roosevelt Station, with over 1,000 employees had no on-site safety specialist assigned and was supported by a safety specialist on the district staff, which, at the time of our visit, had one vacant safety position. According to the New York District Safety Manager and a New York Metro Area staff safety specialist, the staffing levels in both performance clusters were the result of past

[14] According to the New York District Safety Manager, vacancies had not been filled as of February 11, 2004.

reorganizations, staff consolidations, and the difficulty experienced in recruiting and retaining qualified safety professionals in the high-cost metropolitan New York Area. In addition, these officials said the downsizing environment within the Postal Service has discouraged hiring.

In the Salt Lake City Performance Cluster, the District Safety Manager was required to perform full-time duties as the Injury Compensation Manager,[15] in addition to his Safety Manager duties. According to the Safety Manager, there is not a position in the performance cluster for an Injury Compensation Manager because of staffing and budget constraints. As a result, he told us he spends about 75 percent of his time performing the duties of that position.

Postal Service policy[16] states that organizational levels must plan budgets and provide funds that support effective and comprehensive safety and health programs and sufficient personnel to properly implement and administer the program. Plants with 1,000 or more career employees are authorized a safety specialist position.[17]

Additional staffing in these performance clusters could help to ensure the continued timely implementation of accident prevention initiatives. We recommended the Long Island and New York District Managers reassess the adequacy of safety staffing resources. In addition, we recommended the Long Island, New York, and Salt Lake City District Managers fill vacant positions, where appropriate, and/or consider other alternatives such as collateral duty assignments to existing staff.

The Manager, Long Island District, stated there was no disagreement with the overall findings of the audit; however, there is a moderate difference between management's vision for ensuring the effectiveness of prevention initiatives and the recommendations that were presented. Specifically, he stated the current level of safety staffing is adequate. He also said all managers must understand they are accountable for ensuring employees are provided with a

[15] An Injury Compensation Manager is responsible for developing, coordinating, and monitoring activities related to the OWCP throughout the performance cluster.
[16] Employee and Labor Relations Manual 17.2, Section 818, February 2003.
[17] Senior Vice President, Human Resources', letter to Area Human Resource Managers, dated September 16, 2003.

safe work environment. Further, he said the role of the safety staff is to provide operations managers with the tools necessary for an effective safety program within their work unit; and local managers must ensure the program is implemented and everyone is held accountable.

The Long Island District Manager also stated that for any program to be truly effective, it must be managed daily. He stated it would not be practical to increase safety staff to sufficient levels to accomplish this task, but it would be practical, with only minor adjustments to current operations management staff, to ensure effective implementation of safety programs using the managers who work with employees every day. He stated this process would also reinforce the principle of individual accountability for maintaining a safe work environment.

The Manager, New York District, agreed to both recommendations and has initiatives completed or planned addressing the issues in the report. He stated the Safety Specialist position was filled at the Morgan Processing and Distribution Center on April 17, 2004. He also stated the District Safety Specialist position was reposted in the New York Metro Area on May 3, 2004. Further, he stated the Facility Safety Coordinators have been trained and perform annual inspections and evaluations of facilities with less than 100 work years.

Salt Lake City Performance Cluster management agreed with our recommendation to provide sufficient personnel and support to properly implement and administer the safety program. They stated an Ad-Hoc Safety manager position will remain in effect until a permanent position is arranged.

We believe the actions taken or planned are responsive to the recommendation and should resolve the issues identified in this report.

Opportunity for Improvement – Safety Training	In the Salt Lake City Performance Cluster, temporary supervisors[18] were not receiving safety training. According to the District Safety Manager, at any given time, there are approximately 100 temporary supervisors deployed in 196 customer service facilities within the cluster. He said formal training is not provided to temporary supervisors because they do not know in advance when craft employees will become temporary supervisors so it is difficult to plan safety training for them. Postal Service policy[19] states that all supervisors must receive safety and health training in accordance with the curriculum established by the Safety Performance Management and Employee Development office. Local offices, districts, and/or headquarters provide this training. Policy[20] also requires installations to develop methods to identify program needs for accident prevention and requires supervisors to implement written programs and action plans, monitor employees' safety performance, and prevent operational safety accidents. Without the necessary training, temporary supervisors may not be developing methods to identify safety program needs for accident prevention. In addition, written programs, action plans, and the monitoring of employees' safety performance may not be sufficient to prevent operational safety accidents. We recommended the Salt Lake City District Manager, require safety training for temporary supervisors. Management stated that training for temporary supervisors who serve for long periods is necessary. Management stated they would fill vacant positions where appropriate, and/or consider other alternatives such as collateral duty assignments. We believe management's actions taken or planned are responsive to the recommendation and should resolve the issues identified.

[18] A temporary supervisor (also referred to as a 204B) is usually a craft employee who has been tasked to temporarily perform duties of a supervisor.
[19] Employee and Labor Relations Manual 17.2, Section 817.11, February 2003.
[20] Employee and Labor Relations Manual 17.2, Section 821.32, February 2003.

Accident Reporting Systems

All 36 facilities we visited in the 12 performance clusters, accumulated and analyzed accident, injury, and illness data in the Human Resources Information Systems (HRIS) and the Risk Management Reporting System (RMRS) for prevention initiatives. However, headquarters personnel told us these systems are antiquated and will be replaced.

Safety personnel at 10 of the 12 performance clusters (Arkansas, Chicago, Greater Indiana, Long Island, Los Angeles, Mid-America, New York, Oakland, Oklahoma, and Salt Lake City) told us they used reports generated from HRIS and RMRS to analyze accident, injury, and illness numbers and rates in specific categories (slips, trips, falls, lifts, and illnesses). These reports were used to determine whether the numbers and rates were greater or less than expected targets, and to develop safety programs and action plans to reduce the number of accidents, injuries, and illnesses.

However, safety personnel at the remaining two performance clusters (Mississippi and Suncoast) told us the systems' data did not always reconcile and they had to develop and rely on alternative software applications to fully analyze data for prevention initiatives. In addition, safety personnel told us they did not have the proper training needed to create queries and customize reports from RMRS.

Postal Service policy[21] requires the safety offices responsible for facilities where accidents occurred to enter accident report information into HRIS. Postal Service policy[22] also states the analysis of accidents and injuries is vital to effective accident prevention programs, and requires management to use reports and statistical analyses to identify and eliminate the principal causes of accidents and hazardous conditions. Postal Service policy[23] further requires each business area that manages source data to identify an individual or organization responsible for developing standards and usage rules to ensure the integrity of data on accidents. The policy also states the standards and rules must ensure that data is accurate,

[21] Employee and Labor Relations Manual 17.2, Section 821.123, February 2003.
[22] Employee and Labor Relations Manual 17.2, Section 821.31, February 2003.
[23] Management Instruction 860-2003-2, Administrative Support, March 6, 2003.

available, usable, and consistent with the data location and other business considerations.

The Manager, Suncoast District, stated that throughout the year, the safety staff prepared analyses based on current accident data that outlined trends. He also said that plans, programs, and procedures were implemented depending on how accidents and injuries were trending. The Manager also stated the performance cluster will continue to establish action plans as needed, monitor for trends and results, and implement necessary activities.

Corrective Actions Planned	The Postal Service has developed the Injury Compensation Performance Analysis System and management told us they will began replacing certain components of the HRIS and RMRS in calendar year 2005. In the interim, headquarters' Safety Performance Management began training June 29, 2004, for safety personnel to run queries and create reports from RMRS using data from HRIS. This action is responsive and should correct the issue identified.

Most Reporting Processes Were Adequate

In all 36 facilities we visited in the 12 performance clusters, the reporting processes used within the various functional areas facilitated accurate reporting of accidents, injuries, and illnesses. However, several facilities in the Mississippi Performance Cluster can improve their completion of accident report forms.

We used a statistical sample to project the accuracy of the 12 performance clusters' data in HRIS, and the completeness of accident report forms[24] for FYs 2002 and 2003.

For 8 of the 12 performance clusters (Arkansas, Greater Indiana, Los Angeles, Mid-America, Mississippi, Oakland, Oklahoma, and Suncoast), we projected that almost all of the information on the accident report forms were contained in the system, and almost all of the accident report forms were complete.

[24] Postal Service Form 1769, Accident Report, was used to report accidents. The instructions on the form required it to be completed for all accidents regardless of the extent of injury or amount of damage. This included all first aid injury cases both reportable and nonreportable.

For the remaining four performance clusters (Chicago, Long Island, New York, and Salt Lake City), our samples did not support a statistical projection; however, our review and tests indicated the data in HRIS was reasonably reliable, and the forms were complete.

Postal Service policy[25] requires supervisors to fully complete the accident report by including preventive action codes[26] and descriptions of accident prevention efforts. The policy also requires managers to review each accident report for accuracy and conduct a follow-up assessment to ensure that action is taken to prevent similar occurrences. In addition, supervisors and managers are required to sign the report as proof they had reviewed it. Policy[27] also requires that the safety officer enter the accident report information into HRIS.

We believe the accident reporting process was accurate because supervisors and managers had received the safety training required by the performance clusters and had communicated the accident reporting process to employees through safety talks and posters.

The Manager, Chicago District, stated there were no disagreements with the audit report relative to the findings.

The Vice President, Great Lakes Area, stated it would be useful if the report contained sufficient information for the audited offices to investigate and correct the deficiencies identified. The Acting Security Specialist, Greater Indiana District Safety Office, also stated they would like clarification of the findings so that future errors can be corrected. For example, they wanted to know what accidents were missing from the database.

We agreed that additional clarification would allow performance clusters to correct future errors. However, because the information includes Social Security Numbers and employee names, we could not include it in our report, with its widespread distribution. However, we provided

[25] Employee and Labor Relations Manual 17.2, Section 821.132, February 2003.
[26] Preventive action codes described the action taken to eliminate or reduce the accident cause(s) and prevent similar accidents.
[27] Employee and Labor Relations Manual 17.2, Section 821.12, February 2003.

	additional clarification to the Greater Indiana Performance Cluster on July 6, 2004. The Manager, Oakland District, agreed with our findings, which resulted in the district reviewing its existing reporting protocols and standard operating procedures in order to improve and reduce those percentages. Management also stated the new processes in place have resulted in fewer discrepancies between the information on the accident report forms and the HRIS. The Vice President, Southwest Area, stated they monitor accurate and timely accident reporting through program evaluations and leadership business reviews. He also stated that both performance clusters maintain high levels of commitment in accurate and timely accident reporting, with a better than 97 percent accuracy rate and a 95 percent timeliness rate.
Opportunity for Improvement – Accident Report Forms	An opportunity for improvement existed in several Mississippi facilities that reported their accidents to the Jackson Safety Office. Specifically, some supervisors did not report the preventive action codes and descriptions on the accident report forms, and some managers did not ensure the forms were accurate and complete. This was required by policy and supported whether accidents had been investigated and the appropriate prevention initiatives had been identified. Employee safety may have been compromised if appropriate corrective actions and prevention initiatives were not implemented. According to the Mississippi District Safety Manager, supervisors did not always complete the accident report forms for a number of reasons. For example, she said some supervisors could not determine which preventive action codes or actions were applicable. We recommended the Mississippi District Manager, instruct the District Safety Managers to provide the necessary training and/or instructions to managers and supervisors to ensure the completion and review of accident forms. The District Manager agreed with our recommendation and provided actions completed and planned that are responsive and should correct the issues identified.

[redacted]	[redacted]
[redacted]	[redacted]
Best Practices	In addition to the best practices identified in the 12 performance clusters, we also identified best practices used by seven[28] private companies. Some of the best practices we identified are similar to those already used postal-wide. (See Appendix G for profiles of the seven companies.)
Measuring for Effectiveness	We identified best practices used by four of seven private companies that could help the performance clusters measure the effectiveness of accident prevention initiatives. The best practices we identified fell into two categories: • Scorecard or scoring system. • Trend analysis or analysis by type of accident. <u>Scorecard System</u> – One company relied on a web-based system called the Environment, Health, and Safety Deployment Plan and Scorecard System. The system was launched in April 2002 and tracked monthly and year-to-date progress on every work site's initiatives and action items using a color-coded system to indicate whether a task was on schedule (green), behind schedule but feasible (yellow), or unable to be achieved (red). The system calculated a visual scorecard based on the site's entries, and users could view progress at the division, work site, or individual project level. Projects coded yellow or red alerted company officials that a site required assistance to get back on target. According to the company's 2002 Environment, Health, and Safety Progress Report, this system allowed the company to identify and close progress gaps much faster than ever

[28] We benchmarked with seven private companies. The remaining three companies provided examples of how they measured the effectiveness of their safety programs. In this report, we address how four companies measured the effectiveness of accident prevention initiatives (and not safety programs).

before, and helped to ensure each site had a greater chance of meeting its annual environment, health, and safety goals. The company's progress report also stated this system ultimately reduced the risk of incidents.[29] The report did not indicate, however, how much of a reduction had occurred.

The Postal Service Headquarters Manager, Safety Performance Management, stated the Postal Service has implemented a Pay for Performance System and provides a scorecard every month to the field at the area, performance cluster, and facility level. The scorecard contains a number of safety indicators, such as OSHA injuries and illnesses and motor vehicle performance rates. The rates are compared to the rates for the same period last year.

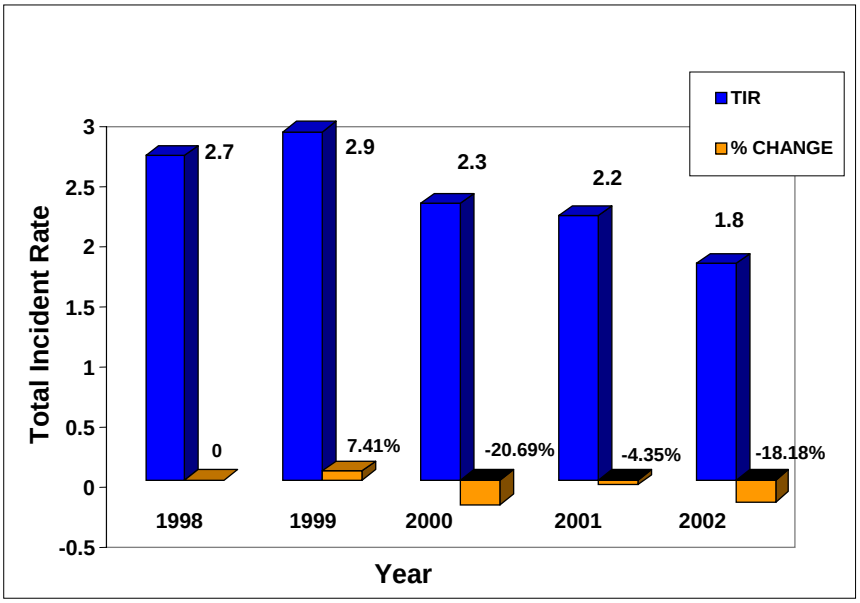
Trend Analysis – Another company conducted a trend analysis of accidents that occurred over a specified period to determine the reductions that occurred in the various types of accidents.

The Manager, Safety Performance Management, stated the Postal Service Safety Performance Management group tracks overall performance every year compared to the baseline year (FY 2001). In addition, trend line charts are provided to the areas monthly, for the eight targeted reduction areas to compare current performance to same period last year. In addition, each district can see their performance for each of the eight indicators on the safety toolkit at the close of each month.

[29] The company's progress report defined an incident as any unpredicted event with capacity to harm human health, the environment, or physical property. According to the company representative, the company collected information on incidents that resulted in damage, injuries, and illnesses as well as incidents that could have resulted in these consequences, which it referred to as "injury-free events" or "near-misses."

Initiatives Reduced Accident Rates	All seven companies said safety programs and initiatives reduced the rate of accidents and injuries. For example, one company representative said there was an 88 percent improvement in the company's incident and injury rate[30] over the past 15 years, and a 72 percent improvement in the last 10 years. As shown in the chart below, the company's 2002 total incident rate (TIR) was 1.8, which was an 18.18 percent improvement from 2001.

Table 3. Company's 1998 – 2004 Total Incident Rate



Source: Company's 2002-2003 Sustainability Report. Chart included data from company's facilities worldwide. Data prior to 2001 was from United States facilities only.

Frequency of Measuring Effectiveness	When asked how frequently they measured the effectiveness of their safety programs and initiatives, one company representative stated there was no specific timeframe. Representatives for the remaining six companies responded their frequency of measuring was either continuously, ongoing, monthly, and quarterly at the corporate level, weekly at the site level, formally once a year, or informally several times a year.

[30] This company defined an incident and an injury as those that required medical treatment and was OSHA reportable. However, the company also included first aid injuries in their incident rate, which were not reported to OSHA.

Headquarters' Initiatives

In July 2004, the Postal Service and one of its major unions, the APWU, entered into an agreement to promote jointly, the OSHA VPP. The process will be implemented through the national, area, and local Joint Labor-Management Safety Committees, and is designed to accomplish the following goals at participating worksites:

- Improve safety and health at the worksite so the Postal Service and APWU can work together to reduce accidents/injuries.
- Train Postal Service worksite managers, supervisors, APWU representatives, and the local Joint Labor-Management Safety and Health Committee to ensure comprehension of the OSHA VPP process.
- Reduce the number and severity of job-related injuries and illnesses.
- Eliminate or reduce unsafe working conditions and practices.

The Manager, Safety Performance Management, stated the Postal Service is also currently working with the NALC in piloting an ergonomic risk reduction process for letter carriers in Albany, New York.

Further, at the national level, the Postal Service and the NALC have formed a task force, which is focused on reducing injuries specific to letter carriers. The task force implemented a pilot in the Eastern Area in August 2003, and will expand the pilot to the Pacific Area in September 2004. The process utilizes the Joint Safety and Health Committees to focus on reducing injuries specific to letter carriers.

We applaud these efforts because we believe it is a significant step in improving the safety and health of employees and customers at facilities nationwide.

Management's Comments	Management stated they had no disagreements with the draft version of this report. Management also stated it is their opinion that the audit team delivered a balanced report and they appreciate the cooperation and courtesies that were afforded to their field and headquarters' managers and staffs by the audit team.

APPENDIX A. ABBREVIATIONS AND ACRONYMS

APWU	American Postal Workers Union
FY	Fiscal Year
OIG	Office of Inspector General
HRIS	Human Resources Information Systems
NALC	National Association of Letter Carriers
OSHA	Occupational Safety and Health Administration
OWCP	Office of Workers' Compensation Programs
PEG	Program Evaluation Guide
RMRS	Risk Management Reporting System
TIR	Total Incident Rate
VPP	Voluntary Protection Programs
WebEIS	Web-Enabled Enterprise Information System

APPENDIX B

LIST OF AUDIT REPORTS FOR SIX AREAS OF OPERATION

Efforts to Prevent Accidents, Injuries, and Illnesses in the Mississippi and Suncoast Performance Clusters – Southeast Area (Report Number HM-AR-04-006, dated April 29, 2004).

Efforts to Prevent Accidents, Injuries, and Illnesses in the Arkansas and Oklahoma Performance Clusters – Southwest Area (Report Number HM-AR-04-007, dated June 28, 2004).

Efforts to Prevent Accidents, Injuries, and Illnesses in the Long Island and New York Performance Clusters – New York Metro Area (Report Number HM-AR-04-008, dated July 7, 2004).

Efforts to Prevent Accidents, Injuries, and Illnesses in the Chicago and Greater Indiana Performance Clusters – Great Lakes Area (Report Number HM-AR-04-009, dated July 7, 2004).

Efforts to Prevent Accidents, Injuries, and Illnesses in the Mid-America and Salt Lake City Performance Clusters – Western Area (Report Number HM-AR-04-0010, dated July 20, 2004).

Efforts to Prevent Accidents, Injuries, and Illnesses in the Los Angeles and Oakland Performance Clusters – Pacific Area (Report Number HM-AR-04-0011, dated July 26, 2004).

APPENDIX C

GENERAL FINDINGS IN 12 PERFORMANCE CLUSTERS

Area of Operation	Performance Cluster	Prevention Initiatives Have the Potential to Become Best Practices	Effectiveness of Prevention Initiatives Was Known/ Unknown	Timeliness of Prevention Initiatives Was Known/Unknown	Accident Reporting Systems Were Adequate[31]	Reporting Processes Were Adequate
Great Lakes	Chicago	Yes	Unknown[32]	Unknown[33]	Yes	Yes
Great Lakes	Greater Indiana	Yes	Unknown[33]	Unknown[33]	Yes	Yes
New York Metro	Long Island	Yes	Unknown[33]	Known	Yes	Yes
New York Metro	New York	Yes	Known	N/A[33]	Yes	Yes
Pacific	Los Angeles	Yes	Unknown[33]	Unknown[33]	Yes	Yes
Pacific	Oakland	Yes	Unknown[33]	Unknown[33]	Yes	Yes
Southeast	Mississippi	Yes	Unknown[33]	Unknown[33]	Yes[34]	Yes
Southeast	Suncoast	Yes	Unknown[33]	Unknown[33]	Yes[35]	Yes
Southwest	Arkansas	Yes	Known	Known	Yes	Yes
Southwest	Oklahoma	Yes	Known	Known	Yes	Yes
Western	Mid-America	Yes	Unknown[33]	Unknown[33]	Yes	Yes
Western	Salt Lake City	Yes	Unknown[33]	Unknown[33]	Yes	Yes

[31] We evaluated the accident reporting systems to determine if data was accumulated and analyzed for prevention initiatives.
[32] We could not determine whether the prevention initiatives resulted in the reduced number of accidents, injuries, and illnesses and/or whether initiatives were implemented in a timely manner because the safety tool kit did not allow safety personnel to track and monitor specific prevention initiatives and/or document when initiatives were implemented.
[33] We did not evaluate the timeliness of prevention initiatives in the New York Performance Cluster because new initiatives were not in place during our audit scope.
[34] Although the Mississippi and Suncoast Performance Clusters were accumulating and analyzing accident, injury, and illness data for prevention initiatives, HRIS and RMRS were inconsistent and did not provide an efficient method of analyzing data for prevention initiatives.

APPENDIX D. SCOPE AND METHODOLOGY

Our 12 performance cluster selections were based on the lowest and highest combined average OSHA injury and illness rates and average accident frequency rates from FY 2002[35] through accounting period[36] 7 in FY 2003.[37] The FYs 2002 and 2003 average total OSHA injury and illness rates and accident frequency rates for the 12 performance clusters are shown in the table below.

Performance Cluster	Average Total OSHA Injury and Illness Frequency Rates	Average Total Accident Frequency Rates*
Arkansas	5.70	14.50
Chicago	6.15	10.51
Greater Indiana	8.71	21.12
Long Island	9.39	17.11
Los Angeles	5.70	11.10
Mid-America	5.40	15.80
Mississippi	4.33	11.86
New York	4.23	9.69
Oakland	9.30	20.40
Oklahoma	9.0	18.90
Salt Lake City	8.80	23.80
Suncoast	8.30	18.73

*This column indicates the average number of employees out of every 100 employees that had an accident during a specific period.

We selected three facilities at each performance cluster based on size and type (for example, airport mail center, processing and distribution center, post office, and station). See Appendix G for a list of the 36 facilities we visited.

To accomplish our objectives, we reviewed applicable federal laws and Postal Service and OSHA policies and procedures related to accident and injury prevention.

To verify whether the number of accidents and injuries was declining as a result of corrections to unsafe working conditions and practices, we obtained data by accident category and code (slips, trips and falls, lifting, dog bites, repetitive motion, striking against, struck by objects, and motor vehicles) for each performance cluster visited. In addition, we obtained accident numbers and accident frequency rate data from the Postal Service WebEIS for FYs 2002 and 2003. We also obtained from RMRS the accident frequency rates, and OSHA injury and illness for FY 2002 and the first eight accounting periods in FY 2003.[38] We reviewed both WebEIS and RMRS data to determine whether downward trends indicated a reduction in accidents, injuries, and illnesses.

To determine whether corrective actions and prevention initiatives were made in a timely manner to reduce the number of accidents, injuries, and illnesses, we reviewed Postal Service policy to learn whether a national or other standard policy existed that addressed how unsafe working conditions

[35] The FY 2002 period for the Postal Service began September 8, 2001, and ended September 6, 2002.
[36] An accounting period is defined as a four-week period that forms one-thirteenth of the Postal Service fiscal year.
[37] The first seven accounting periods for FY 2003 began September 7, 2002, and ended March 21, 2003. The FY 2003 period for the Postal Service began September 7, 2002, and ended September 5, 2003. However, the Postal Service transitioned its financial reporting system from accounting periods to monthly reporting periods on October 1, 2003. The transition period began September 6, 2003, and ended September 30, 2003.
[38] The first eight accounting periods for FY 2003, began September 7, 2002, and ended April 18, 2003.

and practices should be corrected in a timely manner. We reviewed documentation for corrective actions and prevention initiatives implemented from FY 2002, through the following accounting periods in FY 2003 in 11 of the 12 performance clusters:

- Accounting period 8 for Chicago and Greater Indiana.
- Accounting period 11[39] for Los Angeles, Mississippi, Oakland, Oklahoma, and Suncoast.
- Accounting period 12[40] for Long Island and Salt Lake City.
- Accounting period 13 (the entire FY 2003) for Arkansas and Mid-America.

Timeliness of preventive initiatives could not be evaluated at the New York Performance Cluster because new initiatives were not implemented during our audit scope.

To determine whether accident, injury, and illness data were accumulated and analyzed for prevention initiatives, we analyzed accidents, injuries, training documents, and workplace inspection data for sources and locations of accidents and jobs with high occurrences of accidents. We also analyzed accident and injury trends to determine whether a pattern of accidents with common causes could be identified in order to prevent future occurrences. We reviewed action plans and PEG data that were accumulated and analyzed for prevention initiatives during FYs 2002 and 2003.

To determine whether processes used within the various functional areas facilitated accurate reporting of accidents, injuries and illnesses, we interviewed human resources, safety and health program personnel, and management at the area, performance cluster, and facility levels. We obtained information related to accident prevention such as resources, training, accident and hazard reporting, safety talks, and internal controls. In addition, we selected two statistical samples of accidents, injuries, and illnesses entered into HRIS for FY 2002 through the following accounting periods for FY 2003 in the 12 performance clusters:

- Accounting period 8 for Long Island, Los Angeles, Mississippi, New York, Oakland, and Suncoast.
- Accounting period 11 for Oklahoma.
- Accounting period 12 for Salt Lake City.
- Accounting period 13 (the entire FY 2003) for Arkansas, Chicago, Greater Indiana, and Mid-America.

We reviewed a sample of accident report forms for accuracy and completeness, and reviewed a sample of accidents from HRIS to determine whether the information on the accident reports was entered accurately.

Best Practices Scope and Methodology

To identify best practices to help the Postal Service improve its safety program, we reviewed a report published by the American Productivity and Quality Center on benchmarking. We conducted research and identified 12 private companies to include in our review. Our research included information obtained from the Internet, recommendations from a congressional committee, and discussions with the Postal Service Headquarters managers of Health and Resource Management, and OSHA Coordination. In selecting the 12 companies, we obtained information such as:

- Employee population and type of industry.
- Number of vehicles in their fleet.
- Safety program initiatives and accomplishments.
- Location of headquarters.

[39] The first 11 accounting periods for FY 2003, began September 7, 2002, and ended July 11, 2003.
[40] The first 12 accounting periods for FY 2003, began September 7, 2002, and ended August 8, 2003.

Only 7 of the 12 companies participated in the review. Of the five companies that did not participate, three did not respond to our request to partner, and the remaining two were unable to participate.

Inherent Bias in Self-Rating and Self-Reporting

To obtain information from the seven companies, we administered a structured questionnaire. We acknowledge that questionnaires are subject to bias that could affect results. Bias could affect both response rates and the way respondents answer particular questions. We did not assess the magnitude of the effect of bias, if any, on our questionnaire results. One possible source of bias in our questionnaire was inherent in all self-ratings and self-reports. Bias inherent in self-rating and self reporting may impact results because integrity of data depends upon respondents providing honest and accurate answers. The results of our work will be affected by how accurately the respondents reported on their companies' safety programs and the effectiveness of their initiatives.

This review was conducted from May 2003 through September 2004 in accordance with generally accepted government auditing standards and included such tests of internal controls as were considered necessary under the circumstances. We discussed our conclusions and observations with appropriate management officials and included their comments, where appropriate. We believe the computer-generated data was sufficiently reliable to support the opinions and conclusions in this report.

APPENDIX E

PREVENTION INITIATIVES IN 12 PERFORMANCE CLUSTERS LOCATED IN 6 AREAS OF OPERATION

Great Lakes Area

Chicago Performance Cluster

- Corrective Opportunity Patrol Supervisors Program to observe and reward drivers who were performing their duties in a safe manner.
- Employee Involvement Program to allow employees who had accidents to assist in giving training and safety talks on proper safety procedures.
- One-on-One Safety Reviews between employees and their supervisors to help employees perform their jobs safely, and discuss the relationship of job performance to safety expectations.

Greater Indiana Performance Cluster

- The Dog Bite Initiative to bring awareness to the community to help reduce dog bites. This initiative is a partnership between the performance cluster and local animal control.
- The Safety Enhancement Awareness Program, which is a three-hour course held by the safety staff, to train employees with two or more preventable accidents.
- Driver Observations program for supervisors to perform two observations per year, per driver, and then discuss observations with the drivers.

New York Metro Area

Long Island and New York Performance Clusters

- Accident review committees that (1) evaluated corrective actions taken on accidents and the timeliness and quality of accident reporting, and (2) identified systemic causes and corrective/prevention actions.

Long Island Performance Cluster

- One facility, the Mid-Island Processing and Distribution Center, was a test facility for the Postal Service's Ergonomic Risk Reduction Program. This program may help reduce mail handling and lifting injuries.

Pacific Area

- Action plan titled "Line of Sight" that identifies roles and responsibilities up and down the chain of command, which facilitates accurate reporting of accidents.

Los Angeles Performance Cluster

- Standard operating procedure requiring the District Manager be notified immediately (at any time) of all accidents. The District Manager's immediate awareness of accidents helped to ensure that supervisors timely prepare accident reports and conduct accident investigations.

Oakland Performance Cluster

- Safety Compliance Office whose function is to ensure accident reporting processes are followed. The office provided a central source for guidance and instruction to all those involved in accident reporting.

- Mapping software to identify problem sites for motor vehicle accidents by tracking accident locations and times. This helped management make decisions affecting route and transportation changes.

Southeast Area

Mississippi Performance Cluster

- Strobe Light Program to reduce motor vehicle accidents in rural areas by installing strobe lights on top of all rural carrier vehicles.
- Power-lift classes in facilities with the highest number of lifting accidents to provide training on proper lifting procedures.
- SAF-IT Program to reduce the number of accident repeaters by providing training to employees who had two or more accidents.

Suncoast Performance Cluster

- Safety Captain Program to monitor the safety of employees throughout each facility. Rotational assignments were made every six months, giving more employees training opportunities and elevating their safety awareness.
- Facility Improvement boxes for employees to anonymously submit information directly to the Plant Manager. As a result, safety concerns were discussed regularly, management decisions were made concerning actions needed to address safety concerns, and proposed safety improvements were forwarded to department heads for action.

Southwest Area

Arkansas Performance Cluster

- Strobe lights and orange warning sticks on vehicles to reduce motor vehicle accidents.
- Safety Captain Handbook that contains guidelines and instructions for safety captains. As a result, safety captains have a clearer understanding of their roles and responsibilities.

Oklahoma Performance Cluster

- "Shur Steppers" to prevent slips, trips, and falls due to icy conditions. "Shur Steppers" are rubber shoe covers with cleats worn by letter carriers. Safety personnel said in FY 2003, slips, trips, and falls due to icy conditions did not happen to personnel who were wearing "Shur Steppers."
- Driver's training course for new employees and drivers who had previous accidents. This course is mobile and given in many locations throughout the performance cluster. The course consisted of actual driving conditions and hazards.

Western Area

Mid-America Performance Cluster

- Dog bite policy that stated the existence of a potential dog bite danger could result in the curtailment of deliveries to a group of customers (the whole block if applicable) until the danger was removed.
- "Stabilicers" to prevent slips, trips, and falls due to icy conditions. "Stabilicers" are rubber shoe covers with cleats, worn by letter carriers. Safety personnel advised this product was effective in preventing slips, trips, and falls due to icy conditions.

Salt Lake City Performance Cluster

- Driver Observation Tracking Tool to identify infractions made by drivers, and to help the Safety Office target the type of training needed for employees.
- Binder called "Safety for All Seasons" given to those stations where safety staff had not visited. The binder provides uniform guidance on safety issues and contains information regarding accident prevention awareness projects.

APPENDIX F

OSHA INJURY AND ILLNESS AND MOTOR VEHICLE ACCIDENT NUMBERS AND AVERAGE FREQUENCY RATES IN 12 PERFORMANCE CLUSTERS FOR FYS 2002 AND 2003

Area of Operation	Performance Cluster	Numbers		Average Frequency Rates	
		FY 2002	FY 2003	FY 2002	FY 2003
Great Lakes	**Chicago**				
	OSHA Injury and Illness	732	611	6.56	5.73
	Motor Vehicle	273	203	23.71	23.17
	Greater Indiana				
	OSHA Injury and Illness	1,198	964	9.48	7.94
	Motor Vehicle	557	522	11.71	10.29
New York Metro	**Long Island**				
	OSHA Injury and Illness	780	924	8.44	10.42
	Motor Vehicle	228	259	11.64	13.84
	New York				
	OSHA Injury and Illness	590	542	4.14	4.06
	Motor Vehicle	293	263	38.95	33.97
Pacific	**Los Angeles**				
	OSHA Injury and Illness	529	428	5.88	4.95
	Motor Vehicle	160	159	16.15	15.98
	Oakland				
	OSHA Injury and Illness	830	593	9.04	6.73
	Motor Vehicle	271	256	15.60	15.69
Southeast	**Mississippi**				
	OSHA Injury and Illness	209	207	4.19	4.30
	Motor Vehicle	176	224	5.12	6.38
	Suncoast				
	OSHA Injury and Illness	927	852	8.15	7.76
	Motor Vehicle	488	465	13.43	12.52
Southwest	**Arkansas**				
	OSHA Injury and Illness	378	282	6.57	5.11
	Motor Vehicle	221	194	7.24	6.39
	Oklahoma				
	OSHA Injury and Illness	700	599	9.23	8.23
	Motor Vehicle	265	214	6.89	5.71
Western	**Mid-America**				
	OSHA Injury and Illness	598	518	5.64	5.07
	Motor Vehicle	308	306	7.17	6.95
	Salt Lake City				
	OSHA Injury and Illness	385	301	9.47	7.59
	Motor Vehicle	243	190	22.85	17.52

Source: Postal Service WebEIS.

APPENDIX G. LIST OF 36 FACILITIES VISITED

Area of Operation	Performance Cluster	Facilities Visited
Great Lakes	Chicago	• Cardiss Collins Processing and Distribution Center • Fort Dearborn Station • O'Hare Airport Mail Center
Great Lakes	Greater Indiana	• Bacon Station • Indianapolis Airport Mail Center • Indianapolis Processing and Distribution Center
New York Metro	Long Island	• Huntington Station • Long Island Priority Mail Processing Center • Mid-Island Processing and Distribution Center
New York Metro	New York	• Franklin D. Roosevelt Station • Grand Central Station • Morgan Processing and Distribution Center
Pacific	Los Angeles	• Bicentennial Station • Los Angeles Airport Mail Center • Los Angeles Processing and Distribution Center
Pacific	Oakland	• Oakland Main Post Office • Oakland Processing and Distribution Center • San Francisco Bulk Mail Center
Southeast	Mississippi	• Jackson Main Post Office • Jackson Processing and Distribution Center • LeFleur Post Office
Southeast	Suncoast	• Lakeland Main Post Office • Lakeland Processing and Distribution Center • Tampa Processing and Distribution Center
Southwest	Arkansas	• Little Rock Main Post Office • Little Rock Processing and Distribution Center • North Little Rock Main Post Office
Southwest	Oklahoma	• Norman Post Office • Oklahoma City Processing and Distribution Center • Penn Station
Western	Mid-America	• Airport Mail Center • Independence, Missouri Post Office • Kansas City, Missouri Processing and Distribution Center
Western	Salt Lake City	• Auxiliary Service Facility • Salt Lake City Processing and Distribution Center • West Valley Branch

APPENDIX H. PROFILES OF POSTAL SERVICE AND PRIVATE COMPANIES AS OF DECEMBER 2003

Company Name	Company Safety Philosophy	Number of Vehicles	Company Snapshot		Significant Accomplishments (OSHA Injury and Illness Rates Decreased Between 1998 and 2002)
Postal Service	Managers must demonstrate commitment to providing safe and healthful working conditions in all Postal Service-owned and leased installations, become involved in day-to-day safety performance, and be held accountable for safety performance and compliance with OSHA standards and regulations.	209,297	Industry: Communications Employees: 826,955	Headquarters: Washington, DC	Rates decreased 29.8 percent -- from 7.18 to 5.04[1]
Alcoa	Operate worldwide in a safe, responsible manner that respects the environment and the health of their employees, customers, and communities.	No data available	Industry: Aluminum Employees: 127,000	Headquarters: Pittsburgh, Pennsylvania	Rates decreased 43.3 percent -- from 7.35 to 4.17
Blaine Construction Corporation	Education and accountability. Focus on being proactive.	120	Industry: Construction Employees: 500	Headquarters: Knoxville, Tennessee	Rates decreased 80.6 percent -- from 9.4 to 1.8
DuPont	Safety is one of their core values. Holds managers and supervisors accountable for safety.	6,200	Industry: Science, Technology, and Rubber Employees: 70,000	Headquarters: Wilmington, Delaware	Rates decreased 22.1 percent -- from 1.99 to 1.55
General Electric	Strives to ensure all facilities are held to the same standard of 100 percent compliance in environmental health and safety.	Less than 10,000	Industry: Technology Employees: 700,000	Headquarters: Fairfield, Connecticut	Rates decreased 58.6 percent -- from 3.91 to 1.62
International Paper	Encourages employee participation in safety teams, behavior safety steering committees, ergonomic teams, and as department safety advocates.	4,000	Industry: Paper, including building materials Employees: 91,000	Headquarters: Stamford, Connecticut	Rates decreased 33.7 percent -- from 2.7 to 1.8
Raytheon	Focus on protecting employees, not saving money.	No data available	Industry: Technical (Defense Contractor) Employees: 76,000	Headquarters: Waltham, Washington	Rates decreased 60.7 percent -- from 3.1 to 1.2
Xerox	Proactive approach. Preventing accidents through behavior modification before an accident occurs.	6,014	Industry: Office Equipment Employees: 62,744	Headquarters: Stamford, Connecticut	Rates decreased 35.7 percent -- from 1.85 to 1.2

[1] FY 1998 to 2001 information was not available at the time of our review. Thus, we included the rates for FY 2002 and 2003.

APPENDIX I. MANAGEMENT'S COMMENTS

DEWITT O. HARRIS
VICE PRESIDENT
EMPLOYEE RESOURCE MANAGEMENT

UNITED STATES POSTAL SERVICE

September 7, 2004

KIM H. STROUD

SUBJECT: Summary Report on the Efforts to Prevent Accidents, Injuries, and Illnesses in 12 Performance Clusters (Report Number HM-AR-04-DRAFT)

The draft subject report for the 12 performance clusters in six areas has been reviewed. We have no disagreements with the draft version of the audit report. It is our opinion that the investigating team delivered a balanced report.

We appreciate the cooperation and courtesies that were afforded to our field and headquarters managers and staffs by the investigating team.

for DeWitt O. Harris

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