

OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

Kaizen Project at the West Valley Processing and Distribution Center, Phoenix, AZ

Audit Report

Report Number NO-AR-17-005

March 8, 2017





OFFICE OF **INSPECTOR GENERAL** UNITED STATES POSTAL SERVICE

Highlights

West Valley P&DC management did not comply with the Kaizen process or meet its workhour reduction goal of about 26,000 annual workhours for SWYB.

Background

In 2007, the U.S. Postal Service introduced the Continuous Improvement Program to produce organizational process improvements. The program includes Lean Six Sigma (LSS) and Kaizen processes. The Continuous Improvement Office provides a 2-week LSS training course for all Kaizen project leads.

Kaizen (Japanese for "improvement") is an incremental process. The Postal Service's Kaizen process uses a "Plan-Do-Check-Act" method to analyze operational deficiencies and identify root documents because they did not all work on the same tour. causes. A project charter defines the goals, scope, and team member roles for the 3- to 5-day event. At the conclusion of a project, the team prepares a summary report.

Between January and April 2016, the West Valley Processing and Distribution Center (P&DC), Phoenix, AZ, conducted a Kaizen project to eliminate about 26,000 annual workhours in its Scan Where You Band (SWYB) operation for an annual savings of over \$1 million. Employees use the SWYB system to assign air or surface transportation to mail that is in trays, tubs, sacks, and packages.

Our objective was to determine whether the Postal Service complied with the Kaizen process for the SWYB project and met its workhour reduction goal.

What the OIG Found

West Valley P&DC management did not comply with the Kaizen process or meet its workhour reduction goal of about 26,000 annual workhours for SWYB.

Specifically, the Kaizen team never met and the acting P&DC manager who was leading the project did not notify three of the six team members that they were part of the team. He stated that he talked with the team members individually, but did not hold formal meetings or obtain all of their input for preparing

One manager was among those who were not notified even though the summary report identified him as responsible for monitoring workhour reductions after the Kaizen project ended.

In addition, the project lead and the two team members responsible for calculating the 26,000 annual workhour reduction goal, or about 500 weekly workhours, did not document this effort. An acting manager, who was also a Kaizen project member, stated that the 500 weekly workhours reduction goal also included workhour reductions from a concurrent, unrelated Kaizen project. He said the calculations were no longer available because he discarded his notes. The Kaizen process requires that documentation be retained for support and validation.



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The Kaizen project was not independently supervised.

The Kaizen project was not independently supervised. The project lead was also the independent project champion and stated that he did not consider having multiple roles to be an issue. In addition, the Phoenix District LSS coordinator was also the benefit validator for the project. The Western Area LSS coordinator said that project participants having multiple roles was not ideal, but did not consider it an issue.

After SWYB process improvements were made, a Kaizen team member recalculated the projected 500 weekly workhour reduction to be 383 weekly workhours. We found this projection was overstated by 192 workhours and the weekly workhour reduction was about 191 hours. The projection was overstated because it was based on the preceding period instead of the same period last year.

We calculated that, as of November 25, 2016, the West Valley P&DC eliminated, on average, about 160 SWYB workhours a week over 34 weeks compared to the same period last year. However, there is no way to validate a direct correlation

between this reduction and the Kaizen project because the Kaizen process was not followed, the required documentation was not maintained, and a concurrent, unrelated Kaizen project was involved.

We identified opportunities to save about \$12,000 in salaries, training, and travel costs for the project team.

We made a referral concerning the West Valley P&DC's lack of compliance with the Kaizen process to our Office of Investigations.

What the OIG Recommended

We recommended management ensure Kaizen project documentation is reviewed and retained as required; project goals, projections, and sustained benefits are independently reviewed; responsibility for sustaining project benefits is transitioned to the process owner; and Kaizen team roles are properly established to ensure separation of duties.

Transmittal Letter



March 8, 2017

MEMORANDUM FOR: GREGORY G. GRAVES

VICE PRESIDENT, WESTERN AREA OPERATIONS

JOHN J. DIPERI

ARIZONA DISTRICT MANAGER

E-Signed by Michael Thompson ERIFY authenticity with eSign Deskto

FROM: Michael L. Thompson

Deputy Assistant Inspector General

for Mission Operations

SUBJECT: Audit Report – Kaizen Project at the West Valley Processing

and Distribution Center, Phoenix, AZ (Report Number NO-AR-17-005)

This report presents the results of our audit of the Kaizen Project at the West Valley Processing and Distribution Center in Phoenix, AZ (Project Number 17XG006NO000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Margaret B. McDavid, director, Network Processing, or me at 703-248-2100.

Attachment

cc: Postmaster General Corporate Audit and Response Management Vice President, Network Operations

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Findings

Between January and April 2016, the West Valley P&DC conducted a Kaizen project to eliminate almost 26,000 annual workhours in its SWYB operation for an annual savings of over \$1 million.

The acting manager, In-Plant
Support, who was also a Kaizen
project member, stated that the
500 weekly workhours reduction
goal also included workhour
reductions from a concurrent,
unrelated Kaizen project.

Introduction

This report presents the results of our self-initiated audit of the U.S. Postal Service's Kaizen Project at the West Valley Processing and Distribution Center (P&DC), in Phoenix, AZ (Project Number 17XG006NO000). The objective of our self-initiated audit was to determine whether the Postal Service complied with the Kaizen project process for the Scan Where You Band (SWYB) project and met its workhour reduction goal. See Appendix A for additional information about this audit.

In 2007, the Postal Service introduced the Continuous Improvement Program to produce organizational process improvements. The program includes Lean Six Sigma (LSS) and Kaizen processes. Kaizen (Japanese for "improvement") is an incremental improvement process. The Continuous Improvement Office provides a 2-week LSS training course for all Kaizen project leads.

The Postal Service's Kaizen process uses a "Plan-Do-Check-Act" method to analyze operational deficiencies and identify root causes. A project charter defines the goals, scope, and team member roles for the 3- to 5-day event. The Kaizen team spends additional time planning the event and in post-event follow-up. At the conclusion of the project, the team prepares an A3 summary report. A3 is an industry term for the "11x17" paper size used for the report.

Between January and April 2016, the West Valley P&DC conducted a Kaizen project to eliminate almost 26,000 annual workhours in its SWYB operation for an annual savings of over \$1 million. Employees use the SWYB system to assign air or surface transportation to mail that is in trays, tubs, sacks, and packages.

Summary

West Valley P&DC management did not comply with the Kaizen project process or meet the workhour reduction goal of almost 26,000 annual workhours for SWYB.

Specifically, the Kaizen team never met and the acting P&DC manager who was leading the project did not notify three of the six team members that they were part of the team. He stated that he talked with the team members individually, but did not hold formal meetings or obtain all of their input for preparing documents because they did not all work on the same tour.

The manager, Distribution Operations, was among those who were not notified he was on the team even though the A3 summary report identified him as responsible for monitoring workhour reductions after the Kaizen project ended.

In addition, the project lead and two team members were responsible for calculating the workhour reduction goal of about 500 weekly workhours to achieve the annual 26,000 workhour reduction goal. But they did not document this effort. The acting manager, In-Plant Support, who was also a Kaizen project member, stated that the 500 weekly workhours reduction goal also included workhour reductions from a concurrent, unrelated Kaizen project. He stated that the calculations were no longer available because he discarded his notes, even though the Kaizen process requires documentation to be retained for support and validation.

The Kaizen project was not independently monitored. Specifically, the project lead was also the independent project champion and stated that he did not consider having multiple roles to be an issue. Similarly, the Phoenix District LSS coordinator was also the benefit validator. The Western Area LSS coordinator stated that project participants having multiple roles was not ideal, but did not consider it an issue.

¹ Independent and objective evaluator of LSS projects ensures that benefits projected by the LSS Project Belt are comprehensive and feasible and approves documented financial benefits of a project in an LSS project repository.

² Each area office has an LSS coordinator, a Master Black Belt, who is responsible for LSS activities in his or her area.

The project lead did not discuss with the team members their assigned roles, the A3 process, or the project results to create accountability, initiate measures to properly develop employees, and ensure that SWYB workhour

reduction is monitored.

After SWYB process improvements were made, a Kaizen team member (the acting industrial engineer) recalculated the projected 500 weekly workhour reduction to be 383 weekly workhours. In our review of the calculation, we found this projection was overstated by about 192 workhours and the weekly workhour reduction should have been about 191 hours. The projection was overstated because it was based on the preceding period instead of the same period last year (SPLY). Management agreed with our finding.

We calculated that as of November 25, 2016, the West Valley P&DC eliminated an average of about 160 workhours over a 34-week period compared to the SPLY. However, there is no way to validate a direct correlation of the workhour reduction with the Kaizen project because the Kaizen process was not followed, the required documentation was not maintained, and a concurrent, unrelated Kaizen project was supposedly involved.

We identified opportunities to save about \$12,000 in salaries, training, and travel costs for the project team.

We made a referral to the U.S. Postal Service Office of Inspector General's (OIG) Office of Investigations concerning the West Valley P&DC's lack of compliance with the Kaizen process.

Kaizen Process Compliance

West Valley P&DC management did not comply with the Kaizen project process. The Kaizen project team was identified as six employees and the project lead, who was also the acting plant manager. Through interviews conducted during our site visit the week of November 14, 2016, we found that the team never met as a group and three of the six team members – the manager, Distribution Operations; the supervisor, Distribution Operations; and the mail handler group leader – were not told they were part of the team. The A3 summary report identified the manager, Distribution Operations, as responsible for monitoring workhour reductions after the Kaizen project ended.

The project lead stated that he talked with team members individually, but did not hold formal meetings or obtain all of the input of all team members because they did not all work the same tour. As a result, the project lead did not discuss with the team members their assigned roles, the A3 process, or the project results to create accountability, initiate measures to properly develop employees, and ensure that SWYB workhour reduction is monitored so the problem that caused excessive workhours does not occur again. The project lead is required to assign roles to team members at all levels in the SWYB process for accountability, continued support, and assurance that the process owner monitors SWYB operations.

We also found several inconsistencies with the project documentation for the A3 summary report, Project Charter, Green Belt Checklist,³ and Benefit Estimation Summary because management:

- Comingled Labor Distribution Code (LDC)⁴ 17 workhours, which include SWYB and other mail operations in all the project support documents.
- Inaccurately documented the project goal, target, and results and did not conduct or document the follow-up to ensure project benefits were sustained after the improvement was implemented.

³ Keeps track of important information and milestones for receiving Green Belt certification. Green Belts are responsible for managing and leading improvement projects on a day-to-day basis, are trained in basic problem solving techniques, and receive regular guidance and direction from Black Belts assigned to their projects.

⁴ A 2-digit code that identifies major work assignments of employees. The Postal Service compiles workhour, workload, and other reports by functional category or LDC for management.

The project lead and the two team members responsible for calculating the annual workhour reduction goal did not document this effort.

The Kaizen project was not independently supervised because participants ignored the segregation of duty requirements.

- Incorrectly included data from a concurrent, unrelated Kaizen project for flat mail preparation in SWYB documents.
- Improperly signed documentation reflecting multiple roles that should have been segregated.

These inconsistencies occurred because of a lack of management oversight and failure to follow Kaizen process requirements.

Scan Where You Band Workhour Reduction Goal

The project lead and the two team members responsible for calculating the annual workhour reduction goal did not document this effort. The West Valley P&DC Kaizen project goal was to eliminate almost 26,000 annual workhours, or about 500 weekly workhours, in the SWYB operation for an annual savings of over \$1 million. The team included LDC 17 workhours, which cover SWYB plus other mail operations, and did not use SWYB operation level workhours when calculating the workhour reduction goal. In addition, the team did not retain documentation to support how it calculated the goal. The acting manager, In-Plant Support, who was a member of the team, stated that the reduction goal of about 500 weekly workhours also included workhour reductions from a concurrent, unrelated Kaizen project. He stated that the calculations were no longer available because he discarded his notes even though the Kaizen process requires documentation to be retained for support and validation.

For the Kaizen project SWYB original annual workhour goal projected savings see Table 1.

Table 1. Kaizen Project SWYB Original Annual Workhour Goal



Source: Postal Service management A3 and OIG calculations.

Segregation of Duties

The Kaizen project was not independently supervised. The project lead was also the independent project champion and stated that he did not consider participants having multiple roles to be an issue. In addition, the Phoenix District LSS coordinator was also the benefit validator and, therefore, not independent of the project, as required. The Western Area LSS coordinator stated that multiple roles for participants was not ideal and did not consider it to be an issue.

The Kaizen project was not independently supervised because participants ignored the segregation of duty requirements. The manager, Continuous Improvement, concurred with our assessment that segregation of duties was not maintained in this project and took action during our audit to communicate in writing to the area LSS coordinators the importance of segregation of duties for roles and responsibilities during a Kaizen project. Additionally, the Continuous Improvement Office added a process step for LSS trainers to confirm compliance with the segregation of duties by ensuring proper signatures for each authorized role when verifying the belt certification checklist.

We found that the weekly
workhours calculation should
have been about 191 workhours.
The projection was overstated by
192 workhours because it was
based on the preceding period
instead of the SPLY. Management
agreed with our finding.

Workhour Reduction Miscalculation

Kaizen projects use a benefit estimation tool to calculate the direct benefits at each phase of the project. As required, the acting industrial engineer (a member of the Kaizen team) recalculated the projected 500 weekly workhour reduction to be 383 weekly workhours after making SWYB process improvements, or \$791,660 annually. We found that the weekly workhours calculation should have been about 191 workhours. The projection was overstated by 192 workhours because it was based on the preceding period instead of the SPLY. Management agreed with our finding. For a recalculation of SWYB workhour reduction, see Table 2.

Table 2. Recalculation of SWYB Workhour Reduction

	Annual Projected Savings	Annual Projected Workhour Reduction	Weekly Projected Workhour Reduction
Kaizen Event Calculations	\$791,660	19,936	383
OIG Calculations	\$394,400	9,932	191
Difference	\$397,260	10,004	192

Source: Postal Service management Benefit Validation Summary and OIG calculations.

Effectiveness

We found that management overestimated savings by \$299,060 over the 34-week period from the end of the Kaizen event (April 2, 2016) to our site visit (November 25, 2016) compared to the SPLY. The projected savings were \$517,624 and actual savings were \$218,564. There is no way to validate a direct correlation of the workhour reduction with the Kaizen project because the Kaizen process was not followed, the required documentation was not maintained, and a concurrent, unrelated Kaizen project was supposedly involved. The lack of oversight and independent verification caused this miscalculation.

Recommendations

We recommend management
ensure all Kaizen teams
follow Kaizen project
process requirements.

We recommend the vice president, Western Area, and the Arizona District manager:

- 1. Ensure all Kaizen teams follow Kaizen project process requirements.
- 2. Ensure the required Kaizen team segregation of duties for roles and responsibilities is established and followed according to the project charter.
- 3. Ensure Kaizen project documentation is reviewed and retained as required; project goals, projections, and sustained benefits are independently reviewed; and responsibility for monitoring project benefits is transitioned to the process owner.

Management's Comments

Management generally agreed with the findings and recommendations. Regarding our identified opportunities to save about \$12,000 in salaries, training, and travel costs for the project team, management stated they believed the cost of the training was appropriate. They stated the costs are a justifiable investment for future Postal Service leadership and the investment in this event led to substantial savings according to the OIG audit calculations.

Regarding recommendation 1, management stated that they discussed Kaizen project requirements with the Arizona/New Mexico District leadership team and they will monitor the Kaizen process for future events. Management stated they took corrective action February 24, 2017.

Regarding recommendation 2, management stated that the Western Area LSS coordinator's statement about project participants having multiple roles only applied to the specific issue of the Phoenix District LSS coordinator also being the benefit validator. Management also stated that the Kaizen charter protocol regarding segregation of duties for roles and responsibilities has been reviewed with the Arizona/New Mexico District leadership team and the process will be fully followed for future events. Management stated they took corrective action February 24, 2017.

Regarding recommendation 3, management stated that traditional Kaizen protocol regarding project documentation; review of goals, projections, and benefits; and process owner responsibilities were communicated to the Arizona/New Mexico District leadership team and the Kaizen process will be fully followed for future events. Management stated they took corrective action February 24, 2017.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations and corrective actions should resolve the issues identified in the report. Prior to closing the recommendations, we will need to review documentation showing that corrective actions were taken.

Regarding management's disagreement with our identified opportunities to save about \$12,000 in salaries, training, and travel costs for the project team, we believe our calculation is a reasonable estimate of the costs the Postal Service spent on a project that did not comply with the Kaizen process. We did calculate that, as of November 25, 2016, the West Valley P&DC eliminated, on average, about 160 SWYB workhours a week over 34 weeks compared to the same period last year. However, as noted in the audit report, there is no way to validate a direct correlation between this reduction and the Kaizen project because the Kaizen process was not followed, the required documentation was not maintained, and a concurrent, unrelated Kaizen project was involved. Without this correlation, there is no justification for the salaries, training, and travel costs for the project team.

Regarding the Western Area LSS coordinator's statement about project participants having multiple roles, we discussed the segregation of duties issues with the Western Area LSS coordinator during the audit and believe we fairly stated the coordinator's response. We also discussed the issues with the manager, Continuous Improvement, who concurred with our assessment that segregation of duties was not maintained in this project.

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

This is a self-initiated audit resulting from findings in our *Mail Processing and Transportation Operational Changes* report (Report Number NO-AR-16-009, dated September 2, 2016). This report on the Postal Service's Kaizen process described Kaizen teams as "quick response teams based on LSS processes, designed to create a culture of continuous improvement and produce sustainable incremental improvements by identifying areas for improvement at sites and providing immediate benefit for the organization."

In a filing⁵ with the Postal Regulatory Commission, the Postal Service stated that facilities in Phoenix and 21 other cities have held Kaizen projects. The Postal Service identified these facilities as having the most opportunity to improve total overall performance. We judgmentally selected for our audit the Kaizen project for SWYB at the West Valley P&DC in Phoenix, AZ.

Objective, Scope, and Methodology

Our objective was to determine whether the Postal Service complied with the Kaizen process for the SWYB project and met its workhour reduction goal. Employees use the SWYB system to assign air or surface transportation to mail that is in trays, tubs, sacks, and packages.

To accomplish our objective we reviewed and evaluated the SWYB Kaizen project conducted at the West Valley P&DC. Specifically, we:

- Evaluated West Valley P&DC compliance with the Postal Service's established Kaizen process for the SWYB project.
- Analyzed the effectiveness of actions the West Valley P&DC implemented to achieve the identified savings.
- Consulted with OIG operations research analysts to develop our monetary impact methodology.

We conducted this performance audit from November 2016 through March 2017, 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 February 9, 2017, and included their comments where appropriate.

We assessed the reliability of computer-generated data by interviewing knowledgeable agency officials. We determined that the data were sufficiently reliable for the purposes of this report.

⁵ The Postal Service testified before the PRC and discussed Kaizen service improvement teams sent to the highest impact facilities in 22 cities. Annual Compliance Review 2015 (Docket No. ACR2015), Filing ID 95015, dated February 16, 2016.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
Mail Processing and Transportation Operational Changes	Determine the timeliness of mail processing and transportation since the January 5, 2015, service standard revisions and whether the Postal Service realized the projected cost savings from the operational window change.	NO-AR-16-009	9/2/2016	None

Appendix B: Management's Comments

John J. DiPeri District Manager, Arizona / New Mexico



February 27, 2017

TO: LUCINE WILLIS

DIRECTOR, AUDIT OPERATIONS

SUBJECT: Draft Audit Report - Kaizen Project at the West Valley

Processing and Distribution Center, Phoenix, AZ

Report Number NO-AR-17-DRAFT

Management is committed to act upon its findings in the district. It is apparent that the project in question did not follow traditional Kaizen processes, and we have taken steps to address this situation.

The primary goals of a Kaizen event are to make improvements to an operation or process with speed to resolution. This project accomplished this, but failed to adequately adhere to required methodology. Supported by the OIG findings, the project showed documented savings at almost \$400,000. However, the team's initial benefits projection was overstated in financial savings for reducing costs. What was not included were downstream savings in processing which would have enhanced that figure. The team failed to forecast and document the substantial improvements in service and deferred cost savings from the improved cycle efficiency.

Recommendation 1: Ensure all Kaizen teams follow Kaizen project process requirements.

Management Response/Action Plan: We agree with this finding. The primary goals of a Kaizen event are to make improvements to an operation or process with speed to resolution. This project accomplished this, but failed to adequately adhere to required methodology. There were clearly procedural and data issues in this Kaizen event. It appears the belt allowed speed to resolution to override some requirements in methodology. Kaizen project requirements have been discussed with my leadership team and we assure the process will be monitored for compliance on future events.

<u>Target Implementation Date:</u> February 24, 2017

Responsible Official:
District Manager, Arizona / New Mexico

Recommendation 2: Ensure the required Kaizen team segregation of duties for roles and responsibilities is established and followed according to the project charter.

Management Response/Action Plan: We agree with this finding with the exception of the role assigned to the LSS Coordinator. Specifically, the verbiage that first appears in the "WHAT THE OIG FOUND" section: "... in addition, the Phoenix District LSS coordinator was also the benefit validator for the project. The Western Area LSS coordinator said that project participants having multiple roles was not ideal, but did not consider it an issue".

Independent roles are required by the Kaizen chartering standard process for a majority of the Kaizen roles as stated on PS Form 777 and directed by the Western Area LSS coordinator. The response during the audit applied to the specific question regarding the Benefit Validator participant acting as the LSS Coordinator since that role on the standard PS Form 777 is an "if applicable role" only. Duplication of the

4949 East Van Buren Phoenix Arizona 85026-9994 (602) 225-5400 John J. DiPeri District Manager, Arizona / New Mexico



Kaizen charter protocol regarding segregation of duties for roles and responsibilities has been reviewed with my leadership team and this process will be fully followed on any future certified events.

<u>Target Implementation Date:</u> February 24, 2017

Responsible Official:
District Manager, Arizona / New Mexico

Recommendation 3: Ensure Kaizen project documentation is reviewed and retained as required; project goals, projections, and sustained benefits are independently reviewed; and responsibility for monitoring project benefits is transitioned to the process owner.

Management Response/Action Plan: We agree with this finding. This was a complex Kaizen event, as it dealt with potential improvements on two fronts and processing tours. The initial driver behind the improvements to the Scan Where You Band (SWYB) operation was the need to reduce or eliminate the bottleneck in the 24-hour operational clock, thereby improving service and reducing associated costs. The project increased the operational efficiencies and reduced cycle time, which increased the opportunity for direct bypass containers.

The Office of the Inspector General (OIG) notes the initial saving projections made at the conclusion of the project were forecast to be \$791,660, but the audit estimates the actual to be \$394,400. It should be noted that the audit calculated the total time spent on the event to be 29 hours, and the total event cost to be \$1,066. Accepting the audit team's lower projected savings, the return on investment was substantial. While the process used by the belt candidate in calculating their initial savings estimate appears to have been optimistic, certainly the more refined figured reached by the team still supports this Kaizen as a statistical success. Traditional Kaizen protocol has been communicated regarding: project documentation; review of goals; projections; and benefits and process owner responsibilities, with the leadership team and we assure the process will be fully followed on certified required events.

<u>Target Implementation Date:</u> February 24, 2017

Responsible Official:
District Manager, Arizona / New Mexico

We do believe that the cost of training was appropriate. The Audit team concluded there were potential reductions in costs to this project, listing both the \$1,066 spent to conduct the event and the \$10,720 spent to obtain green belt training for the belt candidate that conducted this Kaizen (totaling \$11,786). The benefits of green belt LSS training are invaluable and are integral to the operating philosophy of our organization. These costs are a justifiable investment for future USPS leadership. The investment in this event led to substantial savings according to the audit calculations, I am confident that level of return on investment was a justified expense. In kind we appreciate your investment in time and resources to make our process stronger.

4949 East Van Buren Phoenix Arizona 85026-9994 (602) 225-5400 John J. DiPeri
District Manager, Arizona / New Mexico

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This report and management's response do not contain information that may be exempt from disclosure under the FOIA.

John J. DiPeri

District Manager, Arizona / New Mexico

cc: Greg Graves, Vice President, Western Area Operations Manager, Corporate Audit Response Management

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