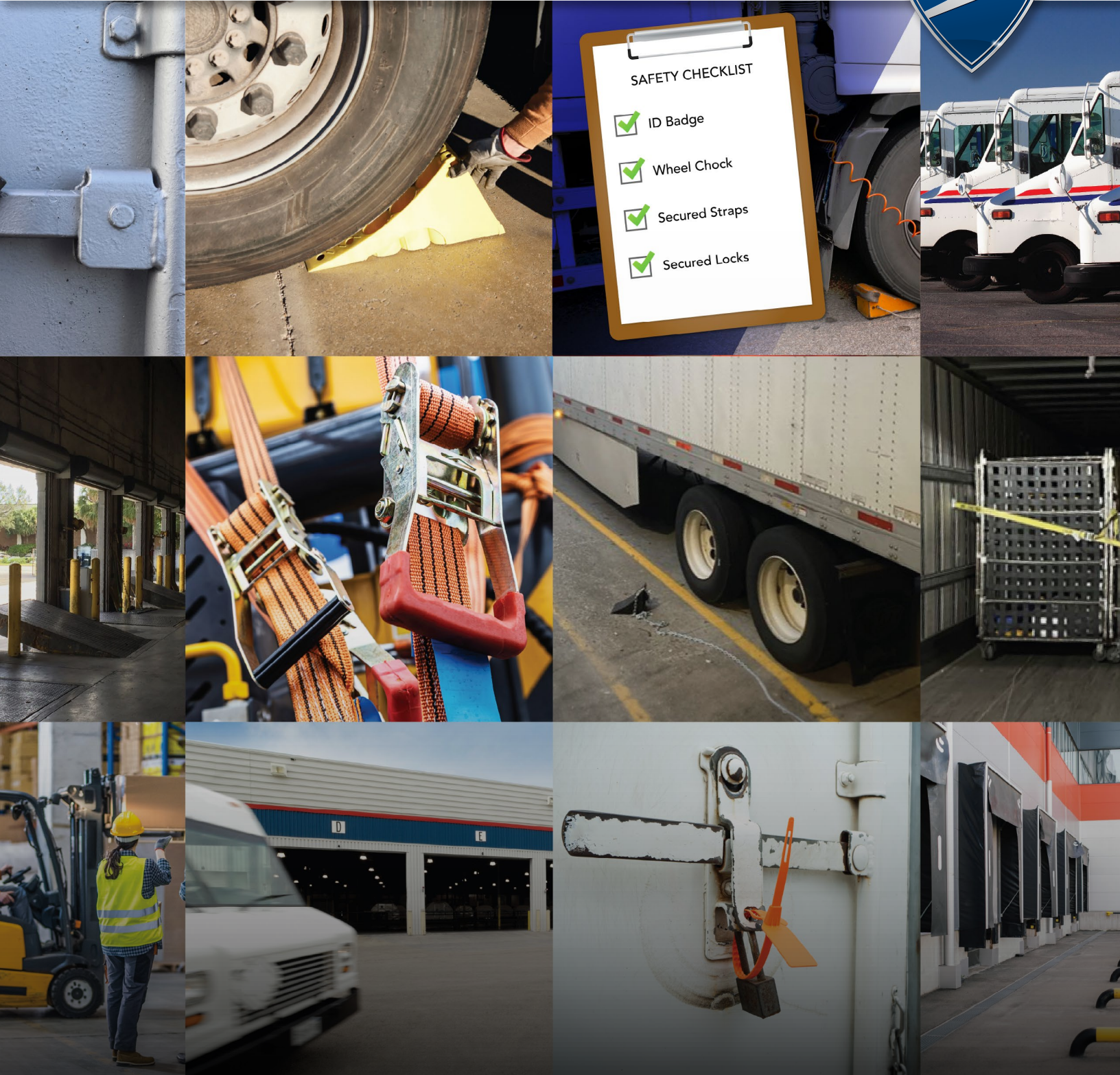


# Transportation Workplace Safety and Driver Security

## AUDIT REPORT

Report Number 23-055-R23 | September 26, 2023





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# Highlights

## Background

The U.S. Postal Service is obligated to maintain the safety and security of its employees, mail, and assets to preserve the public's trust. It must also uphold public confidence in the reliability and integrity of Postal Service personnel, including both Postal Service and contract drivers who handle and transport mail between facilities. In its *Delivering for America* plan, the Postal Service describes how it will build upon existing safety programs to create the safest and healthiest environment possible for its employees, and empower employees to identify, record, and report safety concerns with the goal of reducing all kinds of accidents.

## What We Did

Our objective was to assess the safety and security aspects of the Postal Service's surface transportation network. To accomplish our objective, we conducted reviews at eight mail processing facilities nationwide to determine whether contract drivers had current security clearances and visibly displayed identification badges while working, and that proper forms were completed for badge irregularities. We also identified safety and security concerns that pose a potential threat to employees, the public, mail, and/or assets.

## What We Found

We found the Postal Service did not obtain security clearances for contract drivers; contract drivers did not have valid and properly displayed identification badges; and proper forms were not always completed to document badge irregularities. Additionally, the Postal Service did not comply with safety and security policies for securing transported mail or cargo, nor with motor vehicle accident observation guidelines. Also, safety and security maintenance items were not executed timely to make necessary repairs to facilities. When the Postal Service does not enforce proper safety and security measures, there is an increased risk of lost, damaged, or stolen mail and an increased risk of accidents and injuries to employees.

## Recommendations

We provided five recommendations to address the issues identified with contract driver identification badges and security clearances. Additionally, we recommended the Postal Service issue guidance on management oversight, including directing facility management to enforce and monitor compliance of identified safety and security deficiencies. We also recommended the Postal Service re-issue guidance and reiterate the importance of consistently observing the post-motor vehicle accident process, and finally, we provided recommendations to develop and implement plans to identify and address repair issues and to track completion of maintenance items in a timely manner.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

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September 26, 2023

**MEMORANDUM FOR:** ROBERT CINTRON  
VICE PRESIDENT OF LOGISTICS

MICHAEL L. BARBER  
VICE PRESIDENT, PROCESSING & MAINTENANCE OPERATIONS

BENJAMIN P. KUO  
VICE PRESIDENT, FACILITIES

*Mary H. Lloyd*

**FROM:** Mary Lloyd  
Deputy Assistant Inspector General  
for Mission Operations

**SUBJECT:** Audit Report – Transportation Workplace Safety and Driver Security  
(Report Number 23-055-R23)

This report presents the results of our audit on Transportation Workplace Safety and Driver Security.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Laura Roberts, Director, Transportation, or me at 703-248-2100.

Attachment

cc: Postmaster General  
Corporate Audit Response Management

# Results

## Introduction/Objective

This report presents the results of our self-initiated audit of the Transportation Workplace Safety and Driver Security (Project Number 23-055). Our objective was to assess the safety and security of the U.S. Postal Service’s surface transportation network. See [Appendix A](#) for additional information about this audit.

## Background

The Postal Service is obligated to maintain the safety and security of its employees, mail, and assets to preserve the public’s trust. It must also uphold public confidence in the reliability and integrity of Postal Service personnel, including contract drivers who handle and transport mail. The Postal Service assigns highway contract routes (HCRs) and Postal Vehicle Service (PVS) personnel to transport mail between facilities. An HCR is a route of travel served by a Postal Service contractor that carries mail over highways between designated points. PVS drivers are career Postal Service employees who move mail

“Facility-level management is responsible for providing safety and health training and educating employees on workplace safety.”

among processing facilities, inner-city delivery offices, and local businesses and mailers within a 50-mile radius.

In March 2021, the Postal Service issued its *Delivering for America* 10-year strategic plan. The plan outlines how the Postal Service will build upon existing safety programs

to create the safest and healthiest environment possible for its employees. This includes continuing to empower employees to identify, record, and report safety concerns in real time with the goal of reducing all accidents (motor vehicle<sup>1</sup> and industrial<sup>2</sup>) and communicating safety and health information to the workforce. Postal Service management continues to develop new initiatives,<sup>3</sup> such as conducting daily safety observation walks, and has weekly executive leadership safety review meetings and monthly dock certifications to improve safety and security.

## Transportation Safety

Postal Service management considers employee safety and health a top priority. They believe that 90 to 100 percent of all accidents are avoidable.<sup>4</sup> Facility-level management is responsible for providing safety and health training and educating employees on workplace safety.<sup>5</sup>

Transportation safety concerns at Postal Service facilities primarily focus on tasks associated with the arrival, staging, and dispatching of mail. Postal Service employees and contractors must be aware of safety concerns to eliminate any potential risks, such as:

1. Inoperable Dock Levelers – Postal Service policy states that when employees load and unload mail at a facility, they must use dock levelers to level the gap between the back of a trailer and the dock.<sup>6</sup>
2. Not Using Wheel Chocks – Postal Service policy states that employees must prevent trailers from rolling away from docks by using wheel chocks.<sup>7</sup>
3. Improper Strap Use – Postal Service policy states that straps must be used properly to protect the mail from moving and shifting during transit.<sup>8</sup>

1 Motor vehicle accidents generally consist of accidents involving striking objects or other vehicles while using a Postal Service vehicle in official operations.  
2 Industrial accidents involve personal injuries as well as property damage to motor vehicles, including while the vehicle is legally parked and struck by an object from the road.  
3 Another initiative that Postal Service management is developing is the USPS truck restraint deployment program, which involves installing dock restraints at processing facilities nationwide. Dock restraints will provide additional safety precautions by securing trailers to the dock.  
4 New Supervisor Program, *Participant Guide*, dated July 2022.  
5 *Employee and Labor Relations Manual (ELM)*, Issue 52 – Chapter 8 Safety Health and Environment, dated March 2022.  
6 Handbook PO-413 5170, *Expeditor Basics Training Guide*, dated May 2022.  
7 Handbook EL-803, *Maintenance Employees Guide to Safety*, section 1-C.  
8 Handbook PO-515, *Highway Contractor Safety*, July 2010, and *Postal Operations Manual* Issue 9, Section 474.3 (b) “Loading – Managing the Vehicle Load.”

4. Lack of Locks or Seals on Trailer Doors – Postal Service policy states that doors to the cargo compartment must be equipped with locks or seals and kept locked while in route.<sup>9</sup>

### Transportation Security

Each year, Americans trust the Postal Service with billions of letters and packages, and the vast majority of those arrive safely at their intended destinations. The Postal Service must preserve the security of the mail and ensure all HCR and PVS drivers comply with transportation security policies.

All HCR drivers are required to go through a security clearance process, administered by the U.S. Postal Inspection Service’s Security Investigations Service Center (SISC), to determine their eligibility.<sup>10</sup> Administrative officials are responsible for obtaining, retaining, and submitting clearance documents<sup>11</sup> to the SISC, as well as ensuring drivers have the valid clearance. When there is a pending clearance by the Postal Inspection Service, management issues a temporary photo identification (ID) badge that allows drivers access to mail and mail processing facilities for three months. Once HCR drivers obtain an approved clearance, they are issued a permanent ID badge.<sup>12</sup> HCR drivers are always required to have a proper ID badge visibly displayed.

All PVS drivers must pass a physical before being able to transport mail. Once they pass the physical, ID badges are issued to control access at Postal Service facilities and provide security over operations. PVS drivers are also required to visibly display IDs while officially on duty.<sup>13</sup>

This audit was designed to assess U.S. Postal Service’s transportation workplace safety and driver security.<sup>14</sup> To do so, we judgmentally selected eight Processing and Distribution Centers (P&DCs) nationwide, two from each region, for observations based on the total number of “No Driver ID”<sup>15</sup> scans (see Table 1).

**Table 1. Facilities Selected for Review**

Facility	Logistics Region	Total No Driver ID Scan Percentage
Cleveland P&DC	Central	86%
Detroit P&DC	Central	75%
Knoxville P&DC	Southern	83%
Tampa P&DC	Southern	76%
Los Angeles P&DC	WestPac	72%
Sacramento P&DC	WestPac	79%
Queens P&DC	Atlantic	85%
Northern NJ Metro P&DC	Atlantic	88%

Source: Postal Service Office of Inspector General (OIG) analysis of Surface Visibility (SV)<sup>16</sup> data.

### Finding Summary

We found the Postal Service did not obtain security clearances for all HCR drivers, as required by policy. Specifically, of the 250 HCR drivers’ security clearance records reviewed, about 23 percent had not obtained a security clearance. In addition, during our site observations, 44 percent of the HCR drivers did not have a valid ID badge and 23 percent did not have their valid ID badge properly displayed. Further, proper forms were not completed about 99 percent of the time to document these badge irregularities. Additionally, the Postal Service did not always comply with safety and security policies for securing transported mail or cargo, nor with motor vehicle accident observation guidelines. Also, safety and security maintenance items were not executed timely to make necessary repairs to facilities. When the Postal Service does not enforce proper safety and security measures, there is an increased risk of lost,

<sup>9</sup> *Postal Operations Manual*, Issue 9, Section 476.1 “Sealing Program and Procedures – General Requirements” and Section 476.2 (h) “Exemptions and Exceptions.”

<sup>10</sup> Management Instruction PO-530-2009-4, dated September 2009.

<sup>11</sup> HCR drivers’ clearance packages must include the PS Form 2025 – Contract Personnel Questionnaire, PS Form 2181-C – Authorization and Release – Background Investigation, Form FD 258 – Fingerprint Card, a motor vehicle record less than 30 days old, and two passport-size photos.

<sup>12</sup> Management Instruction PO-530-2009-4, dated September 2009.

<sup>13</sup> *Administrative Support Manual*, Issue 13, Section 277.4 “Displaying Identification”, July 1999 updated through February 28, 2023.

<sup>14</sup> A separate OIG audit is being conducted in response to a Congressional request on *Contract Trucking Safety and Compliance* (Project Number 23-088). This audit will assess the effectiveness of highway contract route safety controls, and contract compliance and oversight.

<sup>15</sup> A “No Driver ID” scan indicates the HCR driver did not have a valid Postal-issued ID/badge.

<sup>16</sup> The Postal Service uses SV to provide management with real-time, surface transportation information. The system tracks HCR and PVS trailers; shows early, on-time, late or cancelled trips; and identifies the mail products scanned on each trailer. The system also assists with developing or changing trip schedules and tracking trailer utilization.



damaged, or stolen mail and an increased risk of accidents and injuries to employees.

### **Finding #1: Issues with HCR Driver Identification Badges and Security Clearances**

The Postal Service has opportunities to improve the security of the surface transportation network by ensuring that HCR drivers have current security clearances on file and visibly display ID badges while officially on duty, and by requiring proper forms to be filed to document ID badge irregularities.

#### **HCR Security Clearance Status**

We found the Postal Service did not obtain security clearances for all HCR drivers, as required by policy. The security clearance process is designed to prevent ineligible or unsuitable applicants from having access to Postal Service mail, assets, and facilities. Specifically, we reviewed 250 HCR drivers' security clearance records to determine if they had a valid security clearance on file. Of the 250 HCR drivers sampled:

- 56 (about 23 percent) had not obtained a security clearance;
- 10 (4 percent) had a "pending" security clearance status;<sup>17</sup>
- 6 (about 2 percent) had an "access rescinded" status;<sup>18</sup> and
- 178 (about 71 percent) had an "active" security clearance status.

All HCR drivers, except the six with rescinded status, were active drivers.

Further, during our site observations, we identified HCR security clearance issues. Specifically:

- At the Tampa P&DC, on April 4, 2023, an HCR driver stated he never submitted his security clearance documents. We disclosed the information to the administrative official, and a security clearance was granted over a month later, on May 9, 2023.
- At the Sacramento P&DC, on April 12, 2023, the administrative official stated two HCR drivers

did not have an active security clearance.

After our visit, security clearance documents were sent to SISC.

One driver's security clearance was granted on May 1, 2023, while the other driver's clearance was granted on May 15, 2023.

- At the Queens P&DC, on April 18, we found two routes (with contracts beginning in 2022) had no security clearance documents for the 26 HCR drivers servicing the routes. The administrative official stated that the contractors were contacted to obtain required information, as they never submitted paperwork requesting driver clearances.
- At the Northern NJ Metro P&DC, on May 15, local management stated they did not focus on enforcing the security clearance process with HCR drivers. However, after the announcement of our audit in March 2023, the administrative official began to follow-up with HCR drivers, and since then, they have been actively submitting clearance paperwork to the Postal Inspection Service.

These conditions occurred because administrative officials 1) did not follow security protocols to ensure HCR drivers completed the required paperwork to obtain security clearances, and 2) did not have sufficient controls in place for tracking and monitoring HCR drivers' security clearance status. For example, when an HCR driver services a facility where the managing administrative official is not located, there is no mechanism to track or verify the status of HCR driver clearances.

“44 percent of the HCR drivers did not have a valid ID badge and 23 percent did not have their valid ID badge properly displayed.”

<sup>17</sup> As of August 2, 2023.

<sup>18</sup> Favorable access granted to an HCR driver by SISC that is subsequently repealed or canceled because the HCR driver was found responsible for a wrongdoing (i.e., mail theft).

## HCR Driver Identification Badges

We found that HCR drivers did not have proper identification verifying they had completed the required security clearance screening. During our site observations, we found 85 of 193 (about 44 percent) HCR drivers did not have a valid ID badge.<sup>19</sup> Additionally, of the drivers that did have valid ID badges, we observed 25 out of 108 (about 23 percent) did not visibly display their ID badges, as required (see Table 2).

In addition, during our interviews, we were informed of instances in which HCR drivers brought unauthorized personnel without valid ID badges, including family members, into secured areas of Postal Service facilities. For example, at the Los Angeles P&DC, local management expressed concerns about HCR drivers carrying their children in their trucks. Also, at the Knoxville P&DC, we found a driver with his child sitting inside the truck. Postal Service regulations allow only authorized employees with valid badges to enter Postal Service properties.

This occurred due to a lack of management oversight. Specifically, the administrative officials were not consistently performing periodic reviews to ensure that they were following and enforcing the issuance of ID badges, and expeditors were not consistently reporting noncompliance with badge display requirements to them, for all HCR drivers.

### PS Form 5500 – Notice of Contractor Irregularity

We found that Postal Service expeditors<sup>20</sup> were not consistently recording HCR driver information in SV. When an HCR driver arrives without a valid ID badge, expeditors must record a PS Form 5500, notice of contractor irregularity, electronically through the SV scanning device. Nationwide, in FY 2022, there were 5.2 million “No Driver ID” scans<sup>21</sup> for HCR drivers recorded in SV; however, only 7,074 (or about 1 percent) PS Form 5500s were recorded. Specifically, we found the following inconsistencies with recording PS Form 5500s during our site visits:

**Table 2. Total HCR ID Badge Observations**

Facility	Dates of OIG Observation (2023)	Total HCR Drivers Observed	HCR Drivers Without Valid ID Badge	HCR Drivers With Valid ID Badge But Not Displayed	HCR Drivers With Valid ID and Properly Displayed
Cleveland P&DC	April 4-5	19	13	3	3
Tampa P&DC	April 4-5	30	8	6	16
Knoxville P&DC <sup>22</sup>	April 4-5	24	16	1	7
Los Angeles P&DC	April 11-12	28	6	2	20
Sacramento P&DC	April 11-12	26	17	2	7
Queens P&DC	April 18-19	22	14	4	4
Detroit P&DC	May 2-3	13	1	4	8
Northern NJ Metro P&DC	May 16-17	31	10	3	18
<b>Total</b>		<b>193</b>	<b>85</b>	<b>25</b>	<b>83</b>

Source: OIG observations from April 4 to May 17, 2023.

<sup>19</sup> This includes 68 HCR drivers without an ID badge and 17 HCR drivers with expired badges.

<sup>20</sup> Expeditors coordinate dock activities, including timely loading, unloading, and scanning of mail containers, and proper routing and dispatch of mail in adherence with dispatch schedules.

<sup>21</sup> A single trip can have multiple outbound scans as it transports mail between plants, post offices, or other designated points.

<sup>22</sup> Following our site visit to the Knoxville P&DC in April 2023, Postal Service officials stated that they have improved monitoring of HCR driver ID badges by following up with HCR drivers to ensure they have valid ID badges before entering the facility.



- Three expeditors stated that they had never recorded a PS Form 5500 even though they had instances when an HCR driver arrived without a valid ID.
- One new expeditor stated he had not received any formal training related to his job responsibilities and was unaware of the requirement.
- Two dock supervisors stated that expeditors at their facility had not received any formal training related to their job responsibilities, although they were aware of the requirement.
- One experienced expeditor and one dock supervisor stated that although they were aware of the requirement, they did not consistently record a PS Form 5500 if they recognized the driver, mainly to speed up the trailer loading process.
- One supervisor stated that while expeditors at his facility will record driver information in the “comment” section of SV, to his knowledge they do not consistently record a PS Form 5500 for drivers without ID badges.

These conditions occurred because the Postal Service does not have a national training program for expeditors to make consistent and accurate decisions regarding reporting irregularities, such as the recordation of PS Form 5500 for drivers without ID badges. Further, local management did not ensure dock personnel asked HCR drivers for identification or recorded the absence of proper identification in SV.

Overall, insufficient management oversight of HCR drivers’ badges and security clearances increases security risks to the public, mail, and assets, which could negatively impact the Postal Service’s brand. When the Postal Service does not preserve and protect the security of the mail in its custody, there is an increased risk of committing unauthorized acts, including opening, inspecting, reading, tampering with, or delaying mail.

#### Recommendation #1

We recommend the **Vice President, Logistics**, develop and implement an action plan, with milestones and measurable goals, to address all Highway Contract Route security clearance status issues identified during our site observations.

#### Recommendation #2

We recommend the **Vice President, Logistics**, require Administrative Officials to conduct periodic reviews to confirm all drivers have current security clearance documents, and create a follow-up process to timely address any identified issues.

#### Recommendation #3

We recommend the **Vice President, Processing and Maintenance Operations**, issue supplemental guidance to facility management on the importance of enforcing policy that requires all drivers to have valid and properly displayed identification badges.

#### Recommendation #4

We recommend the **Vice President, Processing and Maintenance Operations**, develop a national training program for expeditors to increase awareness of the requirements and importance of recording driver information and the PS Form 5500 in Surface Visibility for drivers without identification badges.

#### Recommendation #5

We recommend the **Vice President, Logistics**, in coordination with, **Vice President, Processing and Maintenance Operations** develop a formal process to track and monitor that the expeditors are consistently recording PS Form 5500 when Highway Contract Route drivers arrive without valid identification badges.

## Finding #2: Safety and Security Deficiencies Observed in Dock Areas and Truck Maneuvering Yards

We found that both HCR and PVS drivers did not consistently follow the safety and security policies and procedures for securing and transporting mail. Postal Service policy<sup>23</sup> states management must preserve the security of the mail and ensure PVS and HCR drivers comply with policies regarding the transportation of mail in trailers and trucks. Postal Service policy requires employees to use wheel chocks<sup>24</sup> to prevent trailers from rolling away, straps to secure mail,<sup>25</sup> locks on trailer doors,<sup>26</sup> and seals for

23 *Postal Operations Manual*, Issue 9, section 476.2(h)“Sealing Programs and Procedures – Exemptions and Exceptions”.

24 Handbook PO-701, *Fleet Management*, Section 371.222. Wheel Chocks, dated March 1991 and updated with Postal Bulletin Revisions through October 23, 2008, and HCR Handbook PO-515, *Highway Contractor Safety*, Section 3.32 (i), Vehicle Operations”, dated July 2010.

25 HCR Handbook PO-515, *Highway Contractor Safety*, Section 24.242(i), Procedures for Loading and Unloading Containers and Vehicles, dated July 2010.

26 *Postal Operations Manual*, Issue 9, Section 476.2(h), Sealing Program and Procedures – Exemptions and Exceptions, dated July 2023.

HCR long haul trips.<sup>27</sup> The Postal Service also requires its vehicles to be locked whenever a driver leaves the vehicle. However, the Postal Service is not consistently directing facility management to enforce and monitor compliance of using wheel chocks, straps, and locks, as well as seals on trailer doors to secure trailer cargo, and locking vehicles.

In total, we observed 276 drivers leaving P&DCs with trucks containing mail. Of those 276 observations,

206 total deficiencies (or about 75 percent) were identified regarding unsecured trailers (see Table 3). Specifically, we observed 13 drivers that did not secure the mail with straps, 143 drivers that did not secure trailer doors with a lock, and four expeditors that did not secure trailer doors with a seal before the truck departed the P&DC (see Figure 1 and Figure 2).

**Table 3. Total Deficiencies Identified with Unsecured Trailers**

Facility	Total Drivers Observed	No/Incorrect Use of Straps	No Locks	No Seals	No Wheel Chocks
Cleveland P&DC	19	1	18	1	6
Tampa P&DC	41	0	0	0	1
Knoxville P&DC	26	7	17	0	10
Los Angeles P&DC	44	0	38	0	13
Sacramento P&DC	49	0	13	0	12
Queens P&DC	31	1	21	0	0
Detroit P&DC	30	2	20	1	3
Northern NJ Metro P&DC	36	2	16	2	1
<b>Total</b>	<b>276</b>	<b>13</b>	<b>143</b>	<b>4</b>	<b>46</b>

Source: OIG observations from April 4 to May 17, 2023.

**Figure 1. Trailers With Improperly Placed Straps**



Source: OIG photo taken at Knoxville P&DC on April 4, 2023.

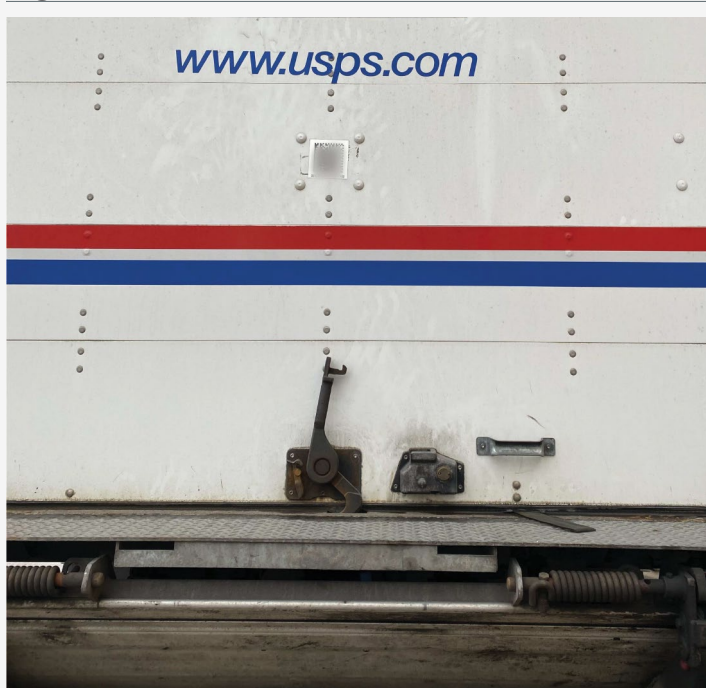


Source: OIG photo taken at Cleveland P&DC on April 4, 2023.

<sup>27</sup> Postal Operations Manual, Issue 9, Section 476.1, Sealing Program and Procedures – General Requirements, dated July 2023.



Figure 2. Trailers Without a Lock



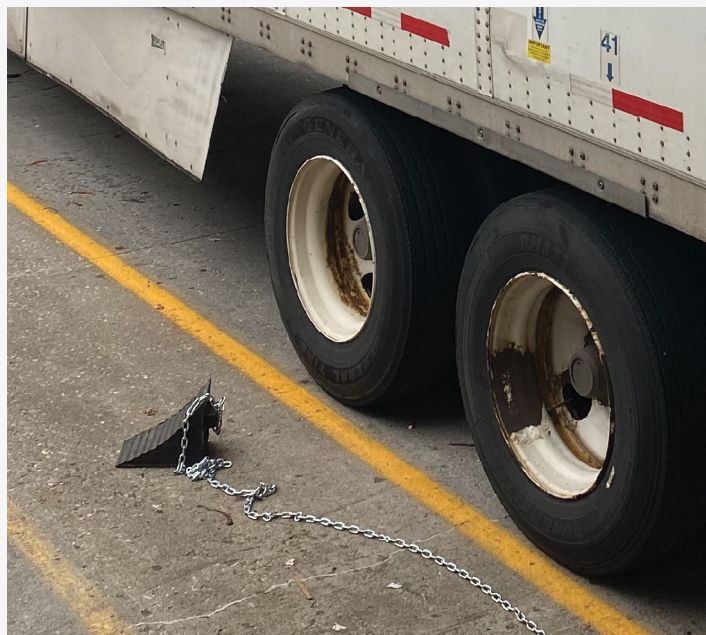
Source: OIG photo taken at Detroit P&DC on May 3, 2023.



Source: OIG photo taken at Knoxville P&DC on April 4, 2023.

In addition, we observed 46 trailers parked at the facility that did not have wheel chocks placed next to the tire to prevent them from rolling away while parked at the dock (see Figure 3).

Figure 3. Trailers Without Wheel Chocks



Source: OIG photo taken at Knoxville P&DC on April 4, 2023.



Source: OIG photo taken at LA P&DC on April 11, 2023.

Lastly, we assessed the security of PVS vehicles at five postal facilities and found several postal vehicles parked in the yard that were unlocked (see Figure 4).<sup>28</sup> Specifically, we found 10 vehicles at the Knoxville P&DC, three vehicles at the Northern NJ Metro P&DC, 11 vehicles at the Queens P&DC, and nine vehicles at the Sacramento P&DC that were unlocked. Further, we found 10 vehicles at the Detroit P&DC that were parked on the streets that were not locked.

28 Handbook PO-701, *Fleet Management*, Section 245.27, dated October 2008, states that whenever a driver leaves the vehicle, the vehicle must be locked.



Figure 4. Unlocked Postal Vehicle



Source: OIG photo taken at Detroit P&DC on May 3, 2023.



Source: OIG photo taken at Queens P&DC on April 18, 2023.

These conditions occurred due to a lack of management oversight. While the facilities we visited had measures in place to facilitate the use of locks or seals on trailer doors, wheel chocks on parked trailers, and straps to secure mail, these measures were overlooked and not consistently enforced by management. When the Postal Service does not enforce proper safety and security measures, there is an increased risk of lost, damaged, or stolen mail. In addition, when employees and contractors do not observe safety rules, there is an increased risk of accidents and injuries. One of the Postal Service's strategic initiatives in its *Delivering for America* plan is to enhance employee safety. The plan emphasized the goal to create the safest and healthiest environment possible for their employees by empowering employees to identify, record, and report safety concerns. These issues, if addressed, will help accomplish that goal.

#### Recommendation #6

We recommend the **Vice President, Logistics**, and **Vice President, Processing and Maintenance Operations**, issue supplemental guidance directing facility management to enhance oversight by enforcing and monitoring compliance of the identified safety and security deficiencies.

#### Finding #3: Inconsistent Post-Motor Vehicle Accident Observations Process

We found Postal Service management did not consistently conduct post-accident observations for PVS drivers after an accident occurred, as required.<sup>29</sup> Postal supervisors use PS Form 4584, Observation of Driving Practices, to assess the practices of drivers that were recently involved in a motor vehicle accident, which helps identify common errors by monitoring their driving habits. Specifically, three of the seven facilities reviewed<sup>30</sup> did not have a post-accident observation review completed for the sampled PVS drivers involved in an accident (see [Table 4](#)).

<sup>29</sup> Handbook EL-801, *Supervisor's Safety Handbook*, Section 2-3.5, Accident - Investigation Follow-Up, dated July 2020.

<sup>30</sup> While we reviewed the Cleveland P&DC, they did not have FY 2022 post-accident observations in the files we selected; therefore, we considered them in compliance with the requirements.

**Table 4. FY 2022 PVS Motor Vehicle Accident Records**

Facility	Total Accident Records Reviewed	Total Accident Observations Completed
Cleveland P&DC	N/A	N/A
Tampa P&DC	9	9
Knoxville P&DC	3	0
Los Angeles P&DC	1	1
Sacramento P&DC	21	4 <sup>31</sup>
Queens P&DC	6	0
Detroit P&DC	26	5
Northern NJ Metro P&DC	3	0
<b>Total</b>	<b>69</b>	<b>19</b>

Source: OIG analysis of Motor Vehicle Accident files.

These conditions occurred due to a lack of transportation management oversight of the post-accident process. When supervisors do not observe PVS driving practices after an accident, drivers are not given timely and helpful feedback about their driving performance, and supervisors may not know if drivers need to improve or correct unsafe actions. As a result of this inaction, additional and/or more costly accidents and injuries may occur.

**Recommendation #7**

We recommend the **Vice President, Logistics**, re-issue guidance and reiterate the importance of consistently observing Postal Vehicle Service drivers' driving practices after an accident.

**Finding #4: Delayed Safety and Security Maintenance Items**

We found the Postal Service did not timely<sup>32</sup> address the safety – and security–related maintenance items to ensure safe operations in the truck maneuvering yards and dock areas. Based on our nationwide analysis, we identified 2,470 maintenance items

related to dock equipment, doors/windows, fences/gates, and outside lighting issues during FY 2022 (see Table 5) – with average days to complete the maintenance requests between 37 and 60 days.

**Table 5. FY 2022 Safety and Security Maintenance Items**

Maintenance Category	Total Number of Maintenance Items	Average Days to Complete Maintenance Items
Dock Equipment	1,145	37
Doors/Windows	965	37
Fence/Gates	231	43
Outside Lighting	129	60
<b>Total Count</b>	<b>2,470</b>	

Source: OIG analysis of Facilities Single Source Provider data.

The following maintenance items from the facilities we reviewed were taking significantly longer than the national average time for repairs:

- At the Knoxville P&DC, as of April 3, 2023, we found three instances of maintenance items that had not been timely addressed:
  1. A dock door replacement maintenance item had been open for 131 days (maintenance item created on November 23, 2022).
  2. The main exit gate maintenance item had been open for 159 days (maintenance item created on October 26, 2022). The main gate cannot close or lock due to vehicle damage.
  3. An inoperable dock leveler maintenance item had been open for 251 days (maintenance item created on July 26, 2022).
- At the Northern New Jersey Metro P&DC, there were large potholes in the truck yard that had caused injuries to two employees during a two-week period in April 2023. A maintenance item to repair the potholes was opened on

<sup>31</sup> Two drivers at the Sacramento P&DC were terminated following accidents and did not receive observations.

<sup>32</sup> The Postal Service does not have a policy that defines a reasonable timeframe for repairing various types of maintenance items; therefore, the team compared nationwide average days to complete maintenance items to what was observed during site visits.

April 12, 2023, but had remained open for 91 days, as of July 12, 2023.

- At the Tampa P&DC, the south side entrance gate was inoperable at the time of our April 4, 2023, visit. The maintenance item for the gate was opened in March 2022 and was still open as of July 3, 2023. Ongoing delays resulted in the replacement of two contractors hired to fix the gate.
- At the Cleveland P&DC, the main driver entrance gate was inoperable at the time of our April 4, 2023, visit. The maintenance item for the gate was opened on February 23, 2023. The gate was partially repaired in June 2023, but still required additional adjustments to be fully operational. This maintenance item had been open for 141 days, as of July 14, 2023.
- At the Detroit P&DC, the main entrance gate could not be closed due to vehicle damage at the time of our May 1, 2023, visit. The maintenance item for the gate was opened on September 16, 2022, and had been open for 227 days. Facility maintenance personnel stated that long lead times to secure parts extended the repair process. Work was completed in late June 2023.
- At the Los Angeles P&DC, there were entry and exit doors in need of repairs that did not have associated open maintenance items at the time of our April 10, 2023, visit. [REDACTED]

These conditions occurred due to lack of local management oversight to monitor, identify, and address the issues in a timely manner. Additionally, some maintenance items were delayed due to limited supplies and unavailable parts, and some were larger or more complex maintenance items that needed to be assigned to contractors with specialized expertise and skills. Early identification

“When maintenance items are not completed in a timely manner, it increases the safety and security risks to employees or Postal Service assets.”

and reporting of the issues may assist in minimizing delays with repair orders.

When maintenance items are not completed in a timely manner, it increases the safety and security risks to employees or Postal Service assets. For example, inoperable dock plates can increase the risk of mail not being delivered on time due to unavailable dock spaces for loading and unloading mail.

Additionally, malfunctioning gates and entry doors pose an increased risk in safety and security to Postal Service employees and facilities because it allows easy access to the building or premises, which can result in stolen or damaged mail and equipment or harm to employees.

#### Recommendation #8

We recommend the **Vice President, Facilities**, develop and implement an action plan, with milestones and measurable goals, to address all remaining open safety and security maintenance items identified during our site observations.

#### Recommendation #9

We recommend the **Vice President, Facilities**, develop a plan to perform periodic reviews to identify and address safety- and security-repair issues, and to track completion of maintenance items in a timely manner.

### Management's Comments

Management generally agreed with the findings; agreed with recommendations 2 and 7; partially agreed with recommendation 5; and disagreed with recommendations 1, 3, 4, 6, 8, and 9. See [Appendix B](#) for management's comments in their entirety.

Regarding the findings, management argued that they have processes and procedures in place to address the identified issues; however, they recognized they have an opportunity to reinforce those processes and procedures with the employees.

Regarding recommendation 1, management stated they already maintain a log for security clearance status. However, management agreed



to issue supplemental guidance to AOs on their responsibilities concerning HCR security clearance procedures outlined in Management Instruction PO-530-2009-4. Management did not provide a target implementation date.

Regarding recommendation 2, management stated they will issue supplemental guidance to AOs re-iterating the current policy for HCR security clearances. The target implementation date is October 30, 2023.

Regarding recommendation 3, management stated that the role of the Vice President, Processing and Maintenance Operations is limited, as the policies related to drivers are created by Logistics, and they have the primary responsibility for enforcing those policies.

Regarding recommendation 4, management stated that expeditors do not issue PS Form 5500s, and the currently recommended internal training for expeditors demonstrates the expeditor's role in the driver information process, which is limited to correctly entering any irregularities in the SV scanner.

Regarding recommendation 5, the Vice President, Processing and Maintenance Operations stated that expeditors do not issue PS Form 5500s. However, the Vice President, Logistics agreed with this recommendation and stated they will issue supplemental guidance reinforcing the standard operating procedure for recording irregularities within the SV mobile device. The target implementation date is October 30, 2023.

Regarding recommendation 6, management stated they issue supplemental guidance each year to AOs concerning the Management Instruction regarding HCR screening and other official responsibilities of AOs, and that this was last issued in April 2023.

Regarding recommendation 7, management stated they will issue supplemental guidance regarding driver's observations following an accident. The target implementation date is October 30, 2023.

Regarding recommendation 8, management stated the issues identified during site observations were not clearly specified and were general in nature. Management requested that all safety and security

work orders identified during site observations be provided with the actual Facilities Single Source Provider problem number so the appropriate follow-up can occur. They also stated that the items may have been assigned to local maintenance via a PS Form 4805 and not called into the Facilities Response Line. As a result, Facilities would not have a record.

Regarding recommendation 9, management stated that monthly reports, which identify the number of projects that are completed and those that have been open for more than 120 days, are disseminated to the Facilities Team Leads by which they follow up with the respective project manager on status and expected completion.

### **Evaluation of Management's Comments**

The OIG considers management's comments responsive to recommendations 2 and 7; and partially responsive to recommendation 5. We consider management's comments nonresponsive to recommendations 1, 3, 4, 6, 8, and 9 and will pursue concurrence through the formal audit resolution process.

Regarding the findings, we agree that Postal Service has an opportunity to reinforce the processes and procedures they already have in place with the employees and believe this can be accomplished through supplemental guidance and re-issuance of their current guidance. However, we also identified issues in which establishing action plans, conducting periodic reviews, and developing a more robust training program could help reduce the risk of lost, damaged, or stolen mail, and the risk of accidents and injuries to employees.

Regarding recommendation 1, all AOs should follow security protocols to ensure HCR drivers complete the required paperwork, and that they have sufficient controls in place for tracking and monitoring the clearance status for all sites visited. However, management provided only one example of a security clearance log maintained locally, which does not address all security clearance issues identified during our site observations. Further detail is needed to address local management oversight with the clearance process, and to ensure all clearance status issues identified during our site observations are

addressed. We view management's disagreement with recommendation 1 as unresolved and will work with management through the formal audit resolution process.

Regarding recommendation 3, facility management and expeditors, who are responsible for checking the ID badges of drivers, fall under the jurisdiction of Processing and Maintenance Operations. Facility management is responsible for issuing and controlling identification for all employees, contractors, and visitors in their facilities. As stated in the report, expeditors were not consistently reporting noncompliance with badge display requirements for all HCR drivers. We view management's disagreement with recommendation 3 as unresolved and will work with management through the formal audit resolution process.

Regarding recommendation 4, all expeditors have not received formal training. We recognize there is a recommended training for expeditors; however, the intent of the recommendation was to have a formal national training program for all expeditors to increase awareness of the requirements and importance of recording PS Form 5500 irregularities. As stated in the report, nationwide, in FY 2022, only about 1 percent of required PS Form 5500s were recorded. We view management's disagreement with recommendation 4 as unresolved and will work with management through the formal audit resolution process.

Regarding recommendation 5, we corrected the language in the draft report from "issue" to "record," in regard to an expeditor's PS Form 5500 responsibilities, which corresponds with Postal Service policy. Further, expeditors fall under the jurisdiction of Processing and Maintenance Operations who would be responsible for ensuring that expeditors are consistently recording PS Form 5500 when HCR drivers arrive without valid ID badges. In addition, while issuance of supplemental guidance reinforcing the standard operating procedures for recording irregularities will help ensure expeditors are aware of this requirement, it does not fully address the recommendation to track and monitor that the expeditors are, in fact, recording irregularities. We view management's disagreement with

recommendation 5 as unresolved and will work with management through the formal audit resolution process.

Regarding recommendation 6, the intent was to address the safety and security deficiencies identified in this report through enhanced oversight, and was not focused on AO's HCR screening responsibilities. We view management's disagreement with recommendation 6 as unresolved, and we will work with management through the formal audit resolution process.

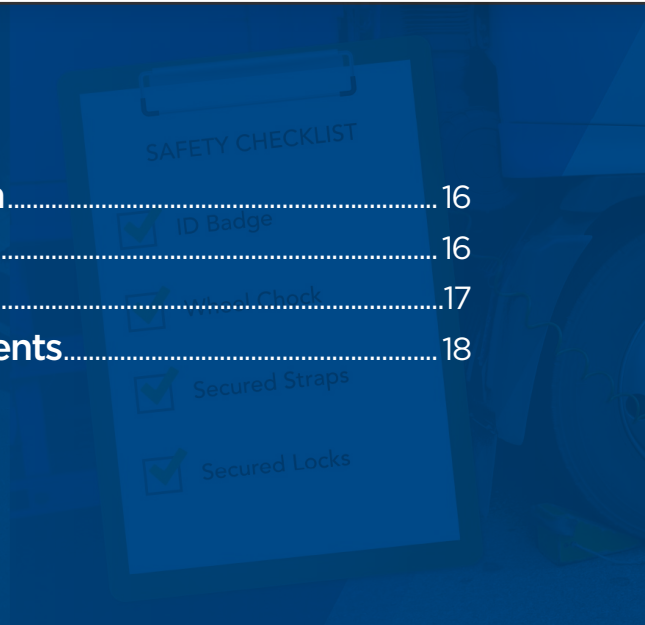
Regarding recommendation 8, we identified maintenance items at all locations visited, communicated all observations with local management, and noted that they are taking significantly longer than the national average time for repairs. We view management's disagreement with recommendation 8 as unresolved and will work with management through the formal audit resolution process.

Regarding recommendation 9, we requested support to show monthly reports are disseminated to the Facilities Team Leads by which they follow up with the respective project manager on status and expected completion; however, this was never provided by management. We view management's disagreement with recommendation 9 as unresolved, and we will work with management through the formal audit resolution process.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. The 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.

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# Appendix A: Additional Information

## Scope and Methodology

The scope of the audit included an assessment of HCR and PVS driver safety and security for the surface transportation network. This also includes safety and security of the dock space at Postal Service facilities. To accomplish our objective, we:

- Reviewed HCR and PVS driver safety and security policies, procedures, and strategies.
- Collected and analyzed HCR and PVS data from FY 2022 related to sites with low driver ID badge scans from SV.
  - Identified selections for onsite observation.
- Obtained and reviewed nationwide data from FY 2022 related to PVS motor vehicle accidents, grievances, PS Form 1767, Tort Claims, and Occupational Safety and Health Administration complaints related to safety or security.
- Obtained and reviewed Postal Service plans related to *Delivering for America* regarding drivers' safety and security.
- Interviewed relevant Postal Service officials to gain an understanding of safety and security for the surface transportation network.
  - Identified policies and procedures for monitoring security processes for HCR and PVS drivers.
  - Identified any management areas of concerns.
  - Inquired about the initiatives to enhance employee security and safety.
- Conducted site observations from April to May 2023 at eight judgmentally selected facilities to observe safety and security concerns that pose a potential threat.
  - Interviewed Postal Service representatives, such as transportation managers, supervisors, administrative officials, and dock expeditors.

- Judgmentally sampled HCR drivers to review their security clearance records to determine if they have a valid security clearance on file.
- Identified trainings related to safety and security for transportation personnel.

We conducted this performance audit from February through September 2023 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 August 25, 2023, and included their comments where appropriate.

In planning and conducting the audit, we obtained an understanding of safety and security of surface transportation internal control structure to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the program and mitigating associated risks. Additionally, we assessed the internal control components and underlying principles, and we determined that the following three components were significant to our audit objective: control activities; information and communication; and monitoring.

We developed audit work to ensure that we assessed these controls. Based on the work performed, we identified internal control deficiencies that were significant within the context of our objectives. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of any computer-generated data used for the purpose of this report. Specifically, we assessed the reliability of SV and Facilities Single Source Provider. We determined that the data were sufficiently reliable for the purposes of this report.

## Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Safety and Health Program Training</i>	To assess the effectiveness of the Postal Service's Safety and Health Program training associated with industrial accidents, the development and use of Accident Reduction Plans (ARP), and efforts promoting safety awareness.	22-120-R23	February 9, 2023	N/A
<i>Efficiency of Operations at the Delaware P&amp;DC, Wilmington, DE</i>	To evaluate the efficiency of operations at the Delaware P&DC.	22-206-R23	January 10, 2023	N/A
<i>Efficiency Operations at the Atlanta, GA P&amp;DC</i>	To evaluate the efficiency of operations at the Atlanta, GA P&DC.	22-179-R23	November 1, 2022	N/A
<i>Nationwide Employee Background Screening</i>	To assess the U.S. Postal Service's employee background screening process to determine whether individuals selected for employment are suitable to maintain the safety and security of the mail and uphold public trust in the Postal Service.	HR-AR-19-003	August 22, 2019	N/A
<i>Efficiency of Operations at the Albuquerque, NM P&amp;DC</i>	To evaluate the efficiency of operations at the Albuquerque P&DC.	22-134-R22	August 5, 2022	N/A
<i>Efficiency of Surface Transfer Centers in the Southern Region</i>	To evaluate the efficiency and effectiveness of Postal Service Southern Region STCs.	21-212-R22	March 16, 2022	N/A
<i>Efficiency and Safety of Lift Gates</i>	To evaluate the efficiency and safety of lift gates used on U.S. Postal Service cargo vans.	20-203-R20	September 16, 2020	\$5,783.00

# Appendix B: Management's Comments



September 15, 2023

JOHN CIHOTA  
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Transportation Workplace Safety and Driver Security (23-055-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft report – *Transportation Workplace Safety and Driver Security*.

Address the Findings:

As stated during our meetings with the OIG, Management argues that there are current processes and procedures in place to specifically address Transportation Workplace Safety and Driver Security. However, we recognize that there is opportunity to reinforce those processes and procedures with our employees in the field.

Following are our comments on each of the nine recommendations.

Recommendation 1:

We recommend the **Vice President, Logistics**, develop and implement an action plan, with milestones and measurable goals, to address all Highway Contract Route security clearance status issues identified during our site observations.

Management Response/Action Plan:

Management disagrees with this recommendation.

Management already maintains a log for security clearance status and provided documentation at our exit meeting. Management will agree to issue supplemental guidance to Administrative Officials on their responsibilities concerning Highway Contract Route Security Clearance Procedures outlined in Management Instruction PO-530-2009-4.

Target Implementation Date: N/A

Responsible Official: N/A

Recommendation 2:

We recommend the **Vice President, Logistics**, require Administrative Officials to conduct periodic reviews to confirm all drivers have current security clearance documents, and create a follow-up process to timely address any identified issues.



Management Response/Action Plan:

Management agrees with this recommendation.

Management argues that Administrative Officials currently conduct periodic reviews as documented in the security clearance documents provided at the exit meeting. However, Management agrees to issue supplemental guidance to Administrative Officials re-iterating the current policy for Highway Contract Route Security Clearance.

Target Implementation Date: 10/30/2023

Responsible Official: Sr. Director Surface Logistics

Recommendation 3:

We recommend the **Vice President, Processing and Maintenance Operations**, issue supplemental guidance to facility management on the importance of enforcing policy that requires all drivers to have valid and properly displayed identification badges.

Management Response/Action Plan:

Management disagrees with this recommendation as written. Policies related to drivers are created by Logistics and they have the primary responsibility for enforcing those policies. The role of the Vice President, Processing and Maintenance Operations is limited.

Target Implementation Date: N/A

Responsible Official: N/A

Recommendation 4:

We recommend the **Vice President, Processing and Maintenance Operations**, develop a national training program for expeditors to increase awareness of the requirements and importance of recording driver information and the PS Form 5500 in Surface Visibility for drivers without identification badges.

Management Response/Action Plan:

Management disagrees with this recommendation. As discussed in meetings with the OIG, Expeditors do not issue PS Form 5500s. Hero course "Surface Visibility (SV) Trip Management" is the currently recommended training for Expeditors. The course demonstrates the Expeditor's role in the driver information process, which is limited to correctly entering any irregularities in the SV scanner, including those related to driver identification.

Target Implementation Date: N/A

Responsible Official: N/A

Recommendation 5:

We recommend the **Vice President, Logistics, in coordination with, Vice President, Processing and Maintenance Operations** develop a formal process to track and

monitor that the expeditors are consistently recording PS Form 5500 when Highway Contract Route drivers arrive without valid identification badges.

Management Response/Action Plan:

The Vice President Processing and Maintenance Operations disagrees with this recommendation as written. As discussed in meetings with the OIG, Expeditors do not issue PS Form 5500s. Expeditor responsibility is limited to correctly entering any irregularities into the SV scanner, including those related to driver identification. Irregularities are monitored by Logistics managers.

Logistics Management agrees with this recommendation. Management will issue supplemental guidance reinforcing the Standard Operating Procedure for recording irregularities within the SV Mobile device.

Target Implementation Date: 10/30/2023

Responsible Official: Sr. Director Surface Logistics

Recommendation 6:

We recommend the **Vice President, Logistics, and Vice President, Processing and Maintenance Operations**, issue supplemental guidance directing facility management to enhance oversight by enforcing and monitoring compliance of the identified safety and security deficiencies.

Management Response/Action Plan:

Management Disagrees with this recommendation. Management issues supplemental guidance each year to Administrative Officials concerning the Management Instruction regarding HCR Screening and other official responsibilities of Administrative Officials. This was last issued in April 2023 and a copy of that correspondence will be provided.

Target Implementation Date: N/A

Responsible Official: N/A

Recommendation 7:

We recommend the **Vice President, Logistics**, re-issue guidance and reiterate the importance of consistently observing Postal Vehicle Service drivers' driving practices after an accident.

Management Response/Action Plan:

Management agrees with this recommendation. Management will issue supplemental guidance regarding driver's observations following an accident.

Target Implementation Date: 10/30/2023

Responsible Official: Sr. Director Surface Logistics



**Recommendation 8:**

We recommend the **Vice President, Facilities**, develop and implement an action plan, with milestones and measurable goals, to address all remaining open safety and security maintenance items identified during our site observations.

**Management Response/Action Plan:**

Management disagrees with this recommendation.

All active calls in the system are assigned to a Project Manager. Issues identified during site observations were not clearly specified and general in nature. Specifically for Detroit P&DC, management was not able to locate a specific FSSP call that referenced the problem noted for the main entrance gate in September 2022. There were no fence or gate problems in FSSP received between 2/10/2022 and 10/5/2022.

Management requests that all safety and security work orders (FSSP calls) identified during site observations be provided with the actual FSSP problem number so the appropriate follow-up can occur. It appears that items may have been assigned to local maintenance via a PS Form 4805 and not called into the Facilities Response Line. As a result, Facilities would not have a record.

**Target Implementation Date:** N/A

**Responsible Official:** N/A

**Recommendation 9:**

We recommend the **Vice President, Facilities**, develop a plan to perform periodic reviews to identify and address safety- and security-repair issues, and to track completion of maintenance items in a timely manner.

**Management Response/Action Plan:**

Management disagrees with this recommendation.

Monthly reports are disseminated to the Facilities Team Leads by which they follow up with the respective project manager on status and expected completion. The report identifies the number of projects that are completed and those that have been open for more than 120 days. Dialogue is ongoing between the Project Manager and their Manager through completion.

**Target Implementation Date:** N/A

**Responsible Official:** N/A

E-SIGNED by Robert Cintron  
on 2023-09-17 19:07:08 CDT

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Robert Cintron  
Vice President, Logistics



E-SIGNED by Jason.R De Chambeau  
on 2023-09-18 13:07:43 CDT

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**Mike Barber**  
Vice President, Processing & Maintenance Operations

E-SIGNED by Benjamin Kuo  
on 2023-09-18 13:53:05 CDT

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**Ben Kuo**  
Vice President, Facilities

*cc: Chief Processing & Distribution Officer and EVP  
Chief Logistics Officer and EVP  
Corporate Audit & Response Management*

# OFFICE OF INSPECTOR GENERAL

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