

U.S. Postal Service's Response to Mail Theft

AUDIT REPORT

Report Number 22-178-R23 | September 28, 2023



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Highlights

Background

The mission of the U.S. Postal Service is to provide the nation with trusted, safe, and secure mail services. As the Postal Service provides mail service to almost 153 million customers six days a week, carrier robberies and mail theft are on the rise across the nation. The Postal Service's role in the development of strategic and technical solutions to address mail theft is critical to combat these incidents. More specifically, the efforts of the Postal Inspection Service, an investigative agency within the Postal Service, to prioritize investigations and customer complaints about alleged mail theft and submit cases for prosecution are key to addressing this rising problem.

What We Did

Our objective was to evaluate the Postal Service's efforts to respond to mail theft. For this audit, we reviewed processes and procedures for addressing mail theft, management of arrow keys, and mail theft complaints, investigations, and carrier robberies from October 1, 2020, through September 30, 2022, for five Postal Inspection Service divisions: Chicago, Houston, Los Angeles, New York, and Washington, DC.

What We Found

The Postal Service is working to prevent mail theft by deploying more secure mail collection boxes and implementing initiatives for enhanced security around their universal mail keys, called arrow keys. However, we found they do not have deployment timelines with actionable milestones to fully implement planned initiatives to address mail theft. We also found that the Postal Service lacks accountability for their arrow keys, which are often a target in carrier robberies and are used to commit mail theft. Additionally, while the Postal Inspection Service implemented efforts to address mail theft and is working to finalize a mail theft strategy, we found they face challenges with staffing and have not assessed and assigned personnel resources nationally to address this issue. We also found that postal inspectors who solely worked mail theft cases are not required to complete specialized training. Lastly, the Postal Inspection Service did not clearly define the purpose of its Mail Theft Analytics Program. We calculated the Postal Service could use over \$1 million more effectively in fiscal years 2023 and 2024 if the purpose of the program was clarified around its efforts to analyze mail theft complaints.

Recommendations

We made seven recommendations, including that management develop a plan with actionable milestones to implement planned initiatives to address mail theft, establish guidance for employees to fulfill arrow key accountability requirements, finalize their Mail Theft Strategy, assess Postal Inspection Service staffing at an agency-wide level, require specialized training for postal inspectors assigned to investigate mail theft, and develop a purpose and metrics for the Mail Theft Analytics Program.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

September 28, 2023

MEMORANDUM FOR: GARY R. BARKSDALE
CHIEF POSTAL INSPECTOR

CRAIG GOLDBERG
DEPUTY CHIEF INSPECTOR, CRIMINAL INVESTIGATIONS

ERIC SHEN
INSPECTOR IN CHARGE, CRIMINAL INVESTIGATIONS

SCOTT BOMBAUGH
CHIEF TECHNOLOGY OFFICER AND EXECUTIVE VICE PRESIDENT

JOSHUA D. COLIN, PHD
CHIEF RETAIL AND DELIVERY OFFICER AND EXECUTIVE VICE
PRESIDENT

A handwritten signature in black ink that reads "W Espinoza".

FROM: Wilvia Espinoza
Deputy Assistant Inspector General
for Inspection Service, Technology, and Services

SUBJECT: Audit Report – U.S. Postal Service's Response to Mail Theft (Report
Number 22-178-R23)

This report presents the results of our audit of the U.S. Postal Service's Response to Mail Theft.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Victoria Dixon, Director, Inspection Service, 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 U.S. Postal Service's Response to Mail Theft (Project Number 22-178). Our objective was to evaluate the U.S. Postal Service's efforts to respond to mail theft. See [Appendix A](#) for additional information about this audit.

Background

The mission of the Postal Service is to provide the nation with trusted, safe, and secure communications and services. In fiscal year (FY) 2022, the Postal Service processed over 127 billion mail pieces.¹ As the Postal Service provides mail service to almost 153 million residences six days a week as part of its universal service obligation, mail can be subject to theft. The Postal Service manages more than 630,000 employees, including more than 200,000 postal carriers who deliver mail to the public.² The U.S. Postal Inspection Service, an investigative agency within the Postal Service, is responsible for supporting and protecting the Postal Service and its employees, infrastructure, and customers; enforcing the laws that defend the nation's mail system from illegal or dangerous use; and ensuring public trust in the mail. For mail theft, the Postal Inspection Service accepts and reviews customer complaints about alleged mail theft, conducts investigations, and submits cases for prosecution.

“We identified 158 news stories from major media outlets about mail theft and carrier robberies from October 2021 through May 2023.”

Concerns about how the Postal Service prevents and responds to mail theft frequently appear in the media and have been a topic of recent Congressional hearings³ and inquiries received by the U.S. Postal Service Office of Inspector General (OIG). We identified 158 news stories from major media outlets about mail theft and carrier robberies from October 2021 through May 2023. These stories discussed the wide range of items stolen from the mail, such as the theft of personal checks that criminals alter and cash or sell using online criminal marketplaces. For example, in November 2022, Axios reported on the dramatic uptick in theft of checks, noting that they are often sold for as much as \$650 online.⁴ Additionally, media have reported on incidents where mail carriers are robbed for their

universal mail keys, called arrow keys, which can then be used to commit mail theft.⁵ For example, in January 2023, a local CBS-TV affiliate in Ohio reported that six mail carriers had been robbed in central Ohio over a three month period.⁶

Mail theft can occur in various ways. Common schemes include individuals breaking into public mail collection boxes,⁷ referred to as blue boxes, package theft

after delivery, stealing mail and keys from a carrier directly to access personal mailboxes, and organized crime schemes involving the sale of washed checks obtained during a mail theft operation. To increase public awareness about mail theft, various law enforcement agencies have issued notices to alert the public. For example, in February 2023, the

1 U.S. Postal Service, *Fiscal Year 2022 Annual Report to Congress*, page 26, dated December 15, 2022.

2 U.S. Postal Service, *Fiscal Year 2022 Annual Report to Congress*, page 30, dated December 15, 2022.

3 [Tracking the Postal Service: An Update on the Delivering for America Plan](#), House Committee on Oversight and Accountability 118th Cong., May 17, 2023; [Delivering for Pennsylvania: Examining Postal Service Delivery and Operations from the Cradle of Liberty](#) | House Committee on Oversight and Reform 117th Cong., September 7, 2022; [The Holiday Rush: Is the Postal Service Ready?](#) | House Committee on Oversight and Reform, 117th Cong., November 16, 2022.

4 Axios.com, “Trending crimes: ‘Check washing’ and ‘mailbox fishing’”, November 16, 2022.

5 Arrow keys are used to access relay boxes, apartment panels, outdoor parcel lockers, neighborhood delivery and collection boxes, and cluster box units. Cluster box units are neighborhood delivery and collection box units that have more than eight individually locked compartments sized to accommodate the delivery of several days' accumulation of mail.

6 10tv.com, “Rep. Joyce Beatty calls for postmaster general to resign in wake of mail carrier robberies,” January 18, 2023.

7 In FY 2021, there were more than 140,000 blue boxes located in public places throughout the country.

Financial Crimes Enforcement Network, in conjunction with the Postal Inspection Service, issued an alert to financial institutions to encourage accurate and timely reporting of suspicious checks.⁸ Similarly, the Postal Inspection Service has published various tips to assist the public in protecting themselves against mail theft, such as picking up packages at a local post office rather than having them delivered to a home address.⁹ According to an October 2022 survey, 14 percent of Americans had a package stolen from their homes in 2022, and 34 percent knew someone else who had a package stolen.¹⁰

Project Safe Delivery Initiative and Prevention Efforts

In a May 12, 2023, press release, Postal Service operations and the Postal Inspection Service acknowledged that “incidents of letter carrier robberies are on the rise across the nation.”¹¹ According to the release, in FY 2022, 412 letter carriers were robbed on the job, and with 305 incidents reported in the first half of FY 2023, these incidents are increasingly more prevalent. Additionally, the agency reported an increase in high volume mail theft incidents from mail receptacles including blue collection boxes: 38,500 in FY 2022 and more than 25,000 in the first half of FY 2023. Lastly, the press release referenced a new Postal Service and Postal Inspection Service joint initiative called Project Safe Delivery that includes prevention efforts aimed at reducing mail theft and carrier robberies; see Finding 1 for more details.

“In FY 2022, 412 letter carriers were robbed on the job, and with 305 incidents reported in the first half of FY 2023, these incidents are increasingly more prevalent.”

Entities Responsible for Responding to Mail Theft

Postal Service operations is responsible for designing and deploying the technology associated with mail delivery, such as updated security features for blue boxes and the tools used to access shared mailboxes, like arrow keys. The Postal Inspection Service investigates crimes committed by non-Postal Service employees.¹² Within the Postal Inspection Service, these criminal cases are investigated under several areas to include Cybercrime, Suspicious Mail, Mail Fraud, and Mail and Package Theft. The Mail Theft Program within the Postal Inspection Service includes investigations of theft of all postal products, such as mail and packages, and collection box break-ins. The Robbery Program includes investigations of robberies or attempted robberies committed against Postal Service employees or contract employees during the performance of their official duties.

Postal Inspection Service headquarters officials provide broad guidance to division leadership for determining which types of cases generally fall within a given program area. However, postal inspectors

who investigate these crimes, with guidance from division leadership, are responsible for determining whether a specific case would be considered mail theft or a related crime (e.g., change of address fraud or robbery). Within the divisions, postal inspectors may work cases in multiple program areas.

As of April 2023, the Postal Inspection Service had 1,208 active postal inspectors and 348 active postal police officers who secure Postal Service

facilities across headquarters and 16 divisions nationally.¹³ Of the 16 Postal Inspection Service divisions, we selected five divisions to review based on the number of mail theft and robbery cases

8 Financial Crimes Enforcement Network, “Emerging Trends in Mail Theft-Related Check Fraud Schemes,” February 27, 2023.

9 U.S. Postal Inspection Service, “Mail Theft”.

10 C+R Research, “Package Theft Statistics in 2022”. This survey did not disclose specific information about delivery service providers.

11 U.S. Postal Service, “USPS, Postal Inspection Service Roll Out Expanded Crime Prevention Measures To Crack Down on Mail Theft, Enhance Employee Safety and Strengthen Consumer Protections,” <https://about.usps.com/newsroom/national-releases/2023/0512-usps-postal-inspection-service-roll-out-expanded-measures-to-crack-down-on-mail-theft.htm>, May 12, 2023.

12 The Postal Inspection Service sometimes works mail theft cases jointly with the OIG when both employees and outside parties are involved.

13 The responsibilities of postal police officers are under active litigation. During the time of our review, postal police officers were responsible for Postal Service facility and perimeter security where assigned; not all Postal Service facilities have postal police officers assigned to secure them.

opened in FY 2021 and FY 2022: Chicago, Houston, Los Angeles, New York, and Washington, DC. Additionally, we reviewed staffing resources for all 16 divisions. See [Appendix B](#) for a map of the areas covered by each of the 16 Postal Inspection Service divisions. The scope of this review focuses on Postal Service operations and the Postal Inspection Service.

Mail Theft Complaints

The Postal Inspection Service receives mail theft complaints through a variety of sources including public complaints submitted through phone calls, letter correspondence, the Postal Service’s website, and referrals from federal, state, and local law enforcement agencies. When complaints made through the Postal Service’s website appear to fall within the Postal Inspection Service’s jurisdiction, they are sent from the Postal Service’s customer relationship management platform¹⁴ to the Postal Inspection Service’s Financial Crimes Database (FCD). When complaints come in through other means, they are manually entered into the FCD. Postal inspectors use the FCD to retain and review complaints related to mail theft, financial crimes, and other issues.

The Postal Inspection Service developed a Mail Theft Analytics Program (MTAP) comprised of five contractors and a program manager. Within MTAP,

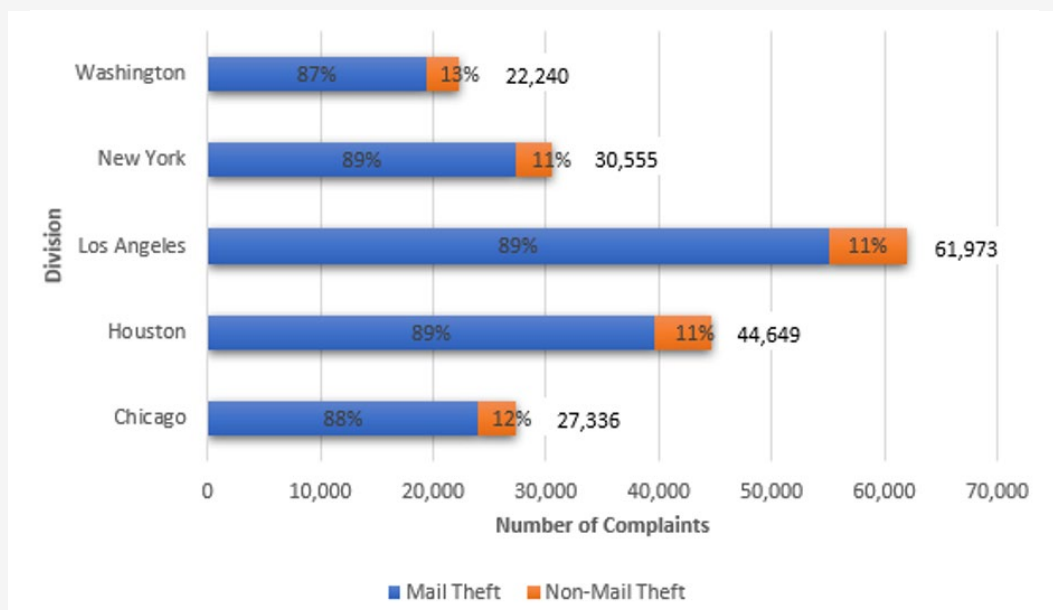
there are two levels of contractors with different primary responsibilities. Level 1 contractors review FCD complaints from Postal Service customers to determine whether they are mail theft related, properly categorized, and can serve as leads for postal inspectors. Level 2 contractors respond to postal inspectors’ requests for investigative support services. The services provided by MTAP contractors fall under a broad contract that provides investigative services for the Postal Inspection Service.

Our prior work related to mail theft during the COVID-19 pandemic found that from March 2020 through February 2021, the Postal Inspection Service received 299,020 mail theft complaints, which was an increase of 184,564 (161 percent) complaints compared to the same period in the previous year.¹⁵

As shown in Figure 1, the majority of the FCD complaints for FYs 2021 and 2022 within the five divisions included in our review were related to mail theft.¹⁶ In just those five divisions, with a total of 165,316 mail theft complaints for that period, mail theft complaints comprised about 89 percent of the 186,753 total complaints received during FYs 2021 and 2022.

Figure 1. FCD Total Complaints in FYs 2021 and 2022 by Postal Inspection Service Division

Source: OIG analysis of Postal Inspection Service complaints from FCD.



¹⁴ This platform is called Customer 360 (C360).

¹⁵ From March 2019 through February 2020, the Postal Inspection Service received 114,456 mail theft complaints. *U.S. Postal Inspection Service Pandemic Response to Mail Fraud and Mail Theft (Report Number 20-305-R21)*, dated May 20, 2021.

¹⁶ These numbers are likely an undercount because USPS.com did not allow customers to submit a complaint about missing or lost mail unless they had a tracking number from approximately October 2021 through May 2022.

Postal Inspection Service Complaint Review Process and Active Cases

In addition to the complaint reviews completed by MTAP contractors, postal inspectors also review complaints in FCD to determine whether they are within their jurisdiction and actionable before opening a case. However, not every complaint will result in a new case. For example, if the Postal Inspection Service receives multiple complaints related to the same allegation, a single case may be opened. Postal inspectors may open two types of cases for mail theft: area cases that are used for preliminary investigative activities and jacketed cases, which are used to document investigative tasks. Incidents of robberies must be opened as a jacketed case. Robberies can be reported to the Postal Inspection Service by employees who were robbed, their management, or another law enforcement agency. Case-specific information on all Postal Inspection Service cases, including those opened as robberies or mail theft, are maintained in the Postal Inspection Service’s Case Management System (CMS).

In the five divisions we reviewed, there were a total of 1,984 active mail theft cases – cases with investigative activity – during FYs 2021 and 2022, as shown in Figure 2.

“In the five divisions we reviewed, there were a total of 1,984 active mail theft cases – cases with investigative activity – during FYs 2021 and 2022.”

In addition to the mail theft cases below, there were 446 active robbery cases during FYs 2021 and 2022 in the five divisions we reviewed. These cases include any robberies or attempted robberies committed against Postal Service employees or contract employees during the performance of their official duties. The 446 cases are distributed across the five divisions as shown in Figure 3.

Figure 2. Active Mail Theft Cases by Postal Inspection Service Division in FYs 2021 and 2022

Source: Postal Inspection Service CMS; OIG analysis.

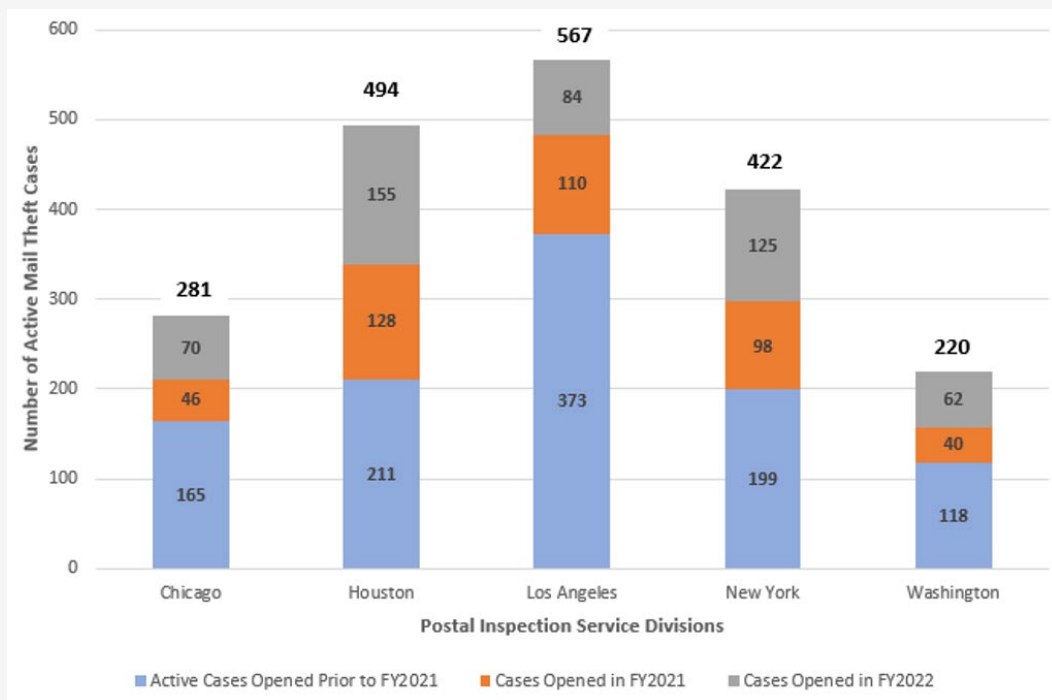
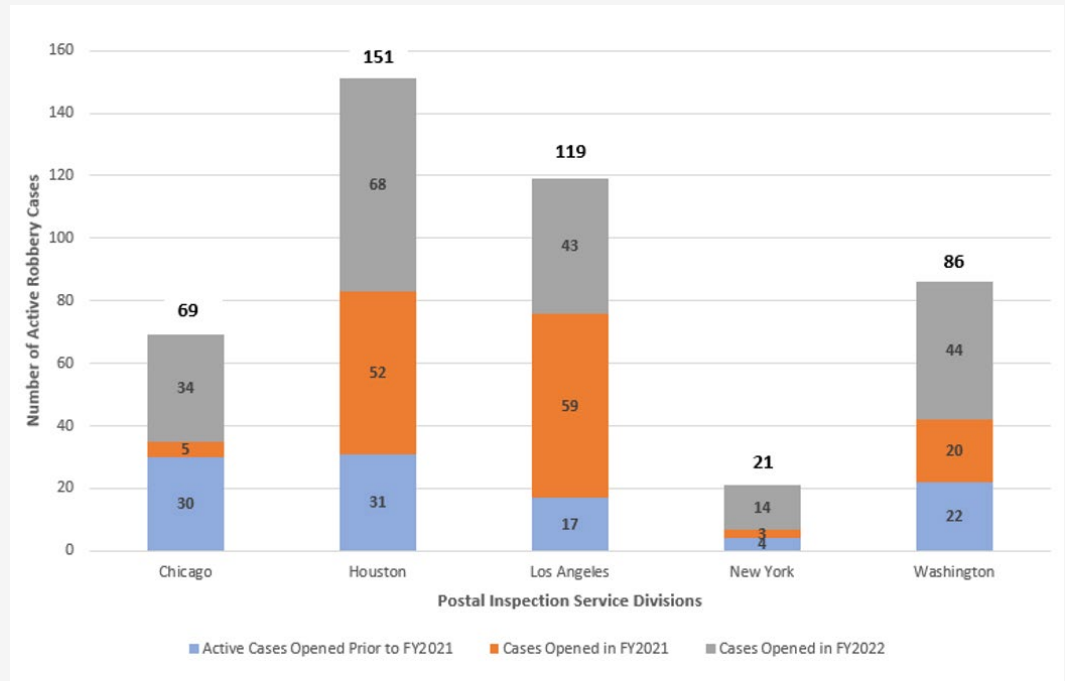


Figure 3. Active Robbery Cases by Postal Inspection Service Division in FYs 2021-2022

Source: Postal Inspection Service CMS; OIG analysis.



We noted the number of active robbery cases in the New York Division were consistently lower than the other four divisions. Postal Inspection Service personnel stated they open jacketed cases for all robbery incidents reported. However, they were unable to provide further information as to why incidents of robbery were lower in the New York Division.

Arrow Keys

The Postal Service uses a universal key, known as an arrow key, to access relay boxes, apartment panels, outdoor parcel lockers, neighborhood delivery and collection boxes, and cluster box units.¹⁷ Postal Service supervisors assign these keys – generally one per route – to letter carriers for use on over 300,000 delivery and collection routes each day. According to Postal Service policy,¹⁸ supervisors at each facility are required to manually document arrow key issuance to, and collection from, carriers

each day, maintain an inventory log to account for all keys, and conduct a semiannual inventory review. This policy is designed to compel arrow key accountability. Arrow keys are a target in carrier robberies because they can be used to commit mail theft by allowing anyone with an arrow key – or a fraudulently duplicated version of an arrow key – to open locked Postal Service boxes and steal the mail inside. Postal Service employees are required to report lost, missing, or stolen arrow keys to the Postal Inspection Service within 24 hours by calling a Postal Inspection Service phone number that is staffed 24-hours a day. Reports of lost or missing keys may be investigated as mail theft cases based on the evidence provided or obtained. On the other hand, reports of stolen keys, especially from carriers on their routes, may be investigated as robbery cases.

As shown in [Figure 4](#), for the five divisions in our scope, 230 of 446 (or 52 percent) active robbery cases involved a robbery of a carrier for their arrow key.

¹⁷ Neighborhood delivery and collection box units have more than eight individually locked compartments sized to accommodate the delivery of several days' accumulation of mail. In addition, collection mail may be deposited in a designated compartment.

¹⁸ *Administrative Support Manual*, Issue 13, Section 273.46 Key Accountability, dated March 31, 2022.

Figure 4. FYs 2021 and 2022 Carrier Arrow Key Robberies by Division

Source: Postal Inspection Service CMS; OIG analysis.



Postal Inspection Service officials were unable to provide reasons for the disparity in the number of robbery incidents among the five divisions.

Prosecution

As postal inspectors investigate mail theft crimes and obtain evidence, they may seek the prosecution of individuals or organizations by attorneys in federal, state, or local prosecutors' offices. Once postal inspectors believe they have enough evidence to warrant prosecution, they may present their case describing all known facts and evidence, verbally or through written correspondence, to a prosecutor. A prosecutor has the discretion to accept or decline a case for prosecution. When prosecuting attorneys accept a case, they will formally take the lead on the case and may request the postal inspector to perform additional investigative steps to obtain additional evidence, or arrest individuals with judicial approval. Postal inspectors alone cannot file criminal charges and must rely on a prosecutor to "accept" the presented case and pursue criminal charges against individuals.

Findings Summary

Although the Postal Service has developed initiatives to address issues around mail theft, carrier robberies, and arrow key accountability, we found they have not established actionable milestones and timelines for the full implementation of these initiatives. We

also found the Postal Service lacks accountability for arrow keys, which are a target in carrier robberies to commit mail theft. Additionally, while the Postal Inspection Service implemented efforts to address mail theft, we found opportunities for improvement in overseeing and addressing mail theft in the areas of staffing, training, and analytics. For example, we found that the Postal Inspection Service has not assessed and assigned personnel resources nationally to address staffing issues. Lastly, the purpose of the Postal Inspection Service's MTAP is not clearly defined to assess its efforts in analyzing mail theft complaints and lacks oversight.

Finding #1: Mail Theft Prevention

The Postal Service has efforts underway to address issues around mail theft, carrier robberies, and arrow key accountability. While some of these efforts are newly implemented and others are enhancements to current processes, we found the Postal Service has not established timelines or milestones to fully implement their planned mail theft initiatives.

Mail Theft and Robbery Initiatives

The Postal Service and the Postal Inspection Service launched a joint initiative, called Project Safe Delivery, to combat the rise in mail theft and carrier robberies. Initiatives related to mail theft, include:

- Increased security of blue collection boxes.

- New controls to enhance the security of arrow keys.
- Partnering with federal, state, and local law enforcement authorities to enforce the laws against individuals who commit crimes against postal employees or engage in mail or package theft.
- Continuing to work with Postal Service unions and management associations on training and employee education for letter carriers and other postal workers.

Additionally, the Postal Inspection Service conducted SURGE operations in areas with high incidents of mail theft. SURGE is an initiative led by the Chief Postal Inspector and Postmaster General that focuses on enforcement, prevention, and protection through investigative and enforcement operations and arrow key audits. SURGE operations were conducted over a two-week period in Chicago, IL, in May 2023, and Oakland, CA, in June 2023.¹⁹ The Postal Inspection Service provided summary results for activities completed during each of the SURGE operations; see Table 1 for a sample of the activities. During the SURGE operations, the divisions received a temporary influx of 65 personnel resources²⁰ to enhance their ongoing activities to address carrier robbery investigations and mail theft, made three federal arrests, and recovered 277 pieces of stolen mail. Additionally, they conducted arrow key accountability reviews at 67 surrounding postal facilities and identified 585 missing arrow keys. Division officials stated the

SURGE operations were a success as the influx in personnel helped to advance mail theft and robbery activities.

Arrow Key and Delivery Initiatives

In June 2023, Postal Service management stated they implemented a new process for ordering arrow keys and locks that introduces several new controls. According to Postal Service officials, the ability to order keys and locks is now restricted to a limited number of employees nationwide. Furthermore, each order must go through three levels of review and approval. Replacement orders for lost, stolen, or broken arrow keys now require information such as proof the key was reported to the Postal Inspection Service if it is being replaced because it is lost or missing.

The Postal Service also offers customers services that may assist in reducing package theft, such as parcel lockers located inside post offices and package tracking. There were 66 parcel lockers nationwide as of November 2022²¹ that provide customers with an alternative delivery service. Additionally, package tracking is an opt-in notification service that allows customers to receive real-time updates about incoming packages. The Postal Service also regularly issues public service information on their website concerning actions customers can take to protect their mail, such as not dropping off letters or packages in blue collection boxes after the last posted pick-up time for the day.

Table 1. SURGE Operation Activities and Results by Division

Division/Location	Additional Temporary Personnel Received	Federal Arrests	Stolen Mail Recovered (Pieces)	Arrow Key Accountability Reviews (Facilities)	Missing Arrow Keys
Chicago (Chicago, IL)	30	2	127	48	228
San Francisco (Oakland, CA)	35	1	150	19	357
Totals	65	3	277	67	585

Source: Postal Inspection Service.

¹⁹ As of August 2, 2023, SURGE operations in Cleveland, OH were ongoing.

²⁰ Additional personnel resources included postal inspectors from other Postal Inspection Service divisions, general analysts, Homeland Security coordinators, OIG special agents, and members of local law enforcement.

²¹ USPS.com, *FAQs Home – Receiving Mail & Packages USPS® Smart Parcel Locker*, November 1, 2022.

As part of their mail theft initiative, the Postal Service plans to deploy 49,000 electronic locks, known as eArrow locks, to replace old locks accessed with an arrow key beginning June 2023 through October 2023. The eArrow locks will add security requirements to open a collection box in addition to an arrow key. Postal Service officials stated that they reviewed Postal Inspection Service crime and theft data to determine where the 49,000 eArrow locks will be deployed. Officials stated that these 49,000 locks are an initial deployment, and that deployment to replace the millions of locks nationwide will be rolled out in phases depending on funding availability. Since funding has not yet been allocated for future fiscal years, Postal Service officials were unable to give a timeline for when the additional locks will be replaced.

Postal Service management also stated that in April 2023, they began deploying 12,000 new high security collection boxes in high security-risk areas. Similar to the eArrow lock initiative, this is an initial rollout to be completed by February 2024. There are approximately 140,000 regular collection boxes in use nationwide, and postal management stated they plan to submit a proposal to fund the replacement of an additional 11,000 regular collection boxes with high security collection boxes in September 2023. In addition, Postal Service management stated that as of November 2022, regular collection boxes are no longer available and only the high security collection boxes can be deployed by local post offices. Since funding has not yet been allocated for future fiscal years, Postal Service officials were unable to give a timeline for when the remaining boxes will be replaced.

Finally, the Postal Service is piloting ways to increase accountability of arrow keys at delivery units. From February 2023 through September 2023, the Postal Service is conducting an arrow key accountability pilot in [REDACTED]

[REDACTED] Postal Service officials stated that they plan to deploy the new process to select postal facilities by October 2023. Additionally,

from November 2022 through March 2023, the Postal Service conducted a pilot with an arrow key cabinet in [REDACTED]

The Postal Service evaluated the results of the pilot and are finalizing program requirements, but do not have an estimated date for implementation.

Without actionable milestones and timelines to implement the eArrow lock, high security collection box, and delivery unit arrow key accountability initiatives beyond their initial rollouts or pilots, the Postal Service is at increased risk of not addressing known mail theft and carrier robbery security issues.

Recommendation #1

We recommend the **Chief Technology Officer and Executive Vice President** develop a plan to include proposed quantities, projected cost, and actionable milestones to fully deploy the eArrow lock and high security mailbox initiatives, and include measures to assess their effectiveness.

Finding #2: Arrow Key Accountability

We found that the Postal Service does not effectively provide accountability over the existing arrow keys. Postal Inspection Service personnel we surveyed reported facing challenges in investigating mail theft due to issues with arrow key accountability. Arrow keys are often used to facilitate mail theft and are a target in carrier robberies. According to Postal Service officials, there are approximately 360,000 arrow keys in use by the Postal Service. When arrow keys are stolen or fraudulently duplicated, the Postal Service cannot prevent their use or know who is using them. This can make it difficult to definitively connect mail theft incidents to reported robberies of carriers for their arrow keys. Of the 446 carrier robbery cases reviewed in the five divisions, 230 (or 52 percent) specifically involved the theft of an arrow key.

Due to the uptick in arrow key theft, the OIG focused on arrow key accountability during our reviews of delivery units in Delaware, Florida, Georgia, New Jersey, and Pennsylvania in the first two quarters of FY 2023.²² Of the 16 Mail Delivery, Customer Service, and Property Conditions Review reports issued by the

²² The time and location of these delivery unit reviews do not fall under the five Postal Inspection Service divisions we reviewed.

OIG from October 2022 to April 2023, 13 had findings related to arrow keys.²³ Across all 16 delivery units, there should have been a total of 550 arrow keys, but we found that 155 arrow keys (28 percent) were missing. These 155 missing keys were assigned to 10 of the 16 delivery units. We reviewed the serial numbers for the 155 missing arrow keys and found 140 (90 percent) were not on the Postal Inspection Service's CMS Arrow Key Report of missing arrow keys.²⁴ Furthermore, six of the 10 (60 percent) delivery units did not report any of the missing arrow keys to the Postal Inspection Service. Arrow keys appear on the CMS Arrow Key Report only if they have been reported as missing to the Postal Inspection Service.

In response to a prior audit report on arrow key management controls in FY 2020, management stated they implemented a semiannual national arrow key inventory process in October 2021.²⁵ Specifically, installation heads²⁶ are required to affirm that all employees have reviewed and are aware of the arrow key policies and that an arrow key training video, mandatory stand-up talk, and standard work instructions were presented to all employees at the unit. In addition, the arrow key mandatory stand-up talk and standard work instructions are required to be posted at the unit.

Additionally, Postal Service policy states that management must keep an accurate inventory of all keys and conduct a physical survey semiannually.²⁷ Policy further states that arrow keys must remain secured until they are individually assigned to personnel. A supervisor or clerk must supervise employees signing out keys on the inventory log. Upon return, arrow keys should be deposited in a secure location and a supervisor or clerk must verify all keys have been returned and accounted for daily.²⁸

Despite existing policies and procedures to account for arrow keys and train staff on proper controls, Postal Service employees continue to not perform arrow key security procedures as required. Of the

16 units, 13 of the units had incorrect processes, such as not having a procedure to control the daily return of arrow keys. Management at two units stated they did not have any procedures for arrow key accountability and management at four of the units indicated they were unaware of arrow key accountability requirements. In addition, supervisory staff at four units stated that they were new to their roles and more focused on mail delivery than arrow key accountability. All these issues occurred due to insufficient oversight and training for supervisors.

Supervisors serve as a critical oversight function to ensure processes are followed and completed. The Postal Inspection Service relies on customer complaints and reports of missing arrow keys to respond to mail theft. If supervisors are not aware of or do not act to account for and report missing arrow keys to the Postal Inspection Service, there is an increased risk of mail theft continuing to occur. These thefts damage the Postal Service's reputation and diminish public trust in the nation's mail system. Additionally, because arrow keys are used to open mail receptacles, lost or misplaced keys could impact mail delivery.

Recommendation #2

We recommend the **Chief Retail and Delivery Officer and Executive Vice President**, provide new and acting managers and supervisors training on arrow key policies upon assuming their roles and maintain documentation of training attendance.

Recommendation #3

We recommend the **Chief Retail and Delivery Officer and Executive Vice President**, develop an oversight mechanism to hold managers and supervisors accountable for following established arrow key policy and training requirements.

Finding #3: Postal Inspection Service Mail Theft Strategy

While the Postal Inspection Service implemented efforts to address mail theft, we found opportunities for improvement in overseeing and addressing mail

²³ See [Appendix A - Prior Audit Coverage](#) for a listing of the reports.

²⁴ Postal Inspection Service maintains an Arrow Key Report in their CMS that logs data related to any arrow key that has been reported to the Postal Inspection Service as lost, stolen, or missing.

²⁵ *Arrow Key Management Controls (Report Number 19-033-R20)*, dated August 31, 2020.

²⁶ The postmaster or manager of customer services is the installation head in a post office or station.

²⁷ *Administrative Support Manual Issue 13*, Sections 273.461, 273.464, and 273.471, July 1999 - updated through March 31, 2022.

²⁸ *Standard Work: Arrow Key Accountability*, January 2022 and *USPS Arrow Key Standard Work*, January 2022.

theft. Specifically, we found that the Postal Inspection Service has not finalized their strategy to address mail theft. Additionally, it has not conducted a national personnel assessment and assigned staffing resources for the Mail Theft Program, and it did not require postal inspectors who solely worked mail theft cases to complete specialized mail theft training. Lastly, the Postal Inspection Service did not clearly define the purpose or establish metrics for overseeing the MTAP program.

Federal regulations provide best practices for workforce planning. Specifically, workforce planning should align with an agency's goals and priorities. Specifically, the Code of Federal Regulations says an agency's Human Capital Operating Plan must be used to support the execution of an agency's strategic plan, as an agency's human capital can affect whether a strategy or strategic goal is achieved.²⁹

Further, according to *Standards for Internal Control in the Federal Government*,³⁰ it is best practice for management to establish objectives for programs and develop internal controls for achieving the objectives. As part of developing internal controls, management should establish a baseline of the current state of the program. Once developed, the internal controls should be well documented and there should be regular monitoring and oversight.

Mail Theft Strategic Plan

The Postal Inspection Service has planned initiatives underway to combat mail theft; however, we found their mail theft strategy is not finalized. In direct response to mail theft overall, Postal Inspection Service management stated it is developing a Mail Theft strategic plan that focuses on five areas: enhance delivery security; advance intelligence led investigations; deploy communications and increase prevention awareness; invest in tools, technology, and data analytics; and deploy advanced training. Postal Inspection Service management stated they began developing the strategy in Spring of 2022, but they do not have an estimated completion date. These strategic goals and the Mail Theft strategic

plan are a part of the Postal Service's broader Project Safe Delivery, discussed in Finding 1 of this report.

Specifically, the Postal Inspection Service's goal of developing data analytics under its Mail Theft strategic plan includes enhancing and leveraging Postal Service and external data and expanding their data analytics capabilities. As of April 2023, Postal Inspection Service management stated they were in the process of developing internal dashboards for tracking crime trends to assist management in identifying locations where additional resources may be needed, such as the areas that are receiving the highest volume of mail theft or robbery complaints. Enhancing analytics in the Mail Theft Program should also assist the Postal Inspection Service in identifying anomalies and trends to determine areas in need of improvement.

While we support the Postal Inspection Service's development of a strategic plan to respond to mail theft, it is essential that this plan is finalized as soon as possible so management can strategically address the reported uptick in mail theft incidents occurring around the nation. Without a finalized Mail Theft strategy to include agency staffing and analytics metrics to align with that strategy and assess its effectiveness, the Postal Inspection Service risks not having a comprehensive and timely approach to addressing mail theft.

National Staffing

While Postal Inspection Service headquarters management says mail theft is prioritized within each division, we found that they have not assessed and assigned personnel resources nationally to address mail theft. The responsibility for staffing postal inspectors to specific program areas, including the Mail Theft Program, occurs at the division level. Assessing resources only at the division level does not consider the agency's overall staffing needs to address mail theft.

The Postal Inspection Service has many roles that play a part in safeguarding mail and responding to mail theft, including postal inspectors who investigate mail theft allegations; Special Assistant U.S. Attorneys (SAUSA) who prosecute cases; contractors who

²⁹ 5 Code of Federal Regulations 250.205.

³⁰ Government Accountability Office, *Standards for Internal Control in the Federal Government*, Report Number GAO-14-704G, dated September 2014.

analyze customer complaint data; general analysts and support personnel who assist with investigations of mail theft complaints and allegations; and postal police officers who secure facilities. In FYs 2021 and 2022, the Postal Inspection Service operated at an average of 88 percent of its authorized staffing complement for postal inspectors. As shown in Figure 5, the average authorized complement for postal inspectors in FYs 2021 and 2022 varied across the five divisions in our review.

According to results from an OIG survey of Postal Inspection Service staff who worked mail theft from FYs 2021 through 2022, 46 of 122 (38 percent) reported a challenge in the availability of staff to work mail theft cases.³¹ For example, one respondent stated he was not able to dedicate sufficient time to an investigation due to the volume of mail theft complaints and the lack of staff available to investigate them.

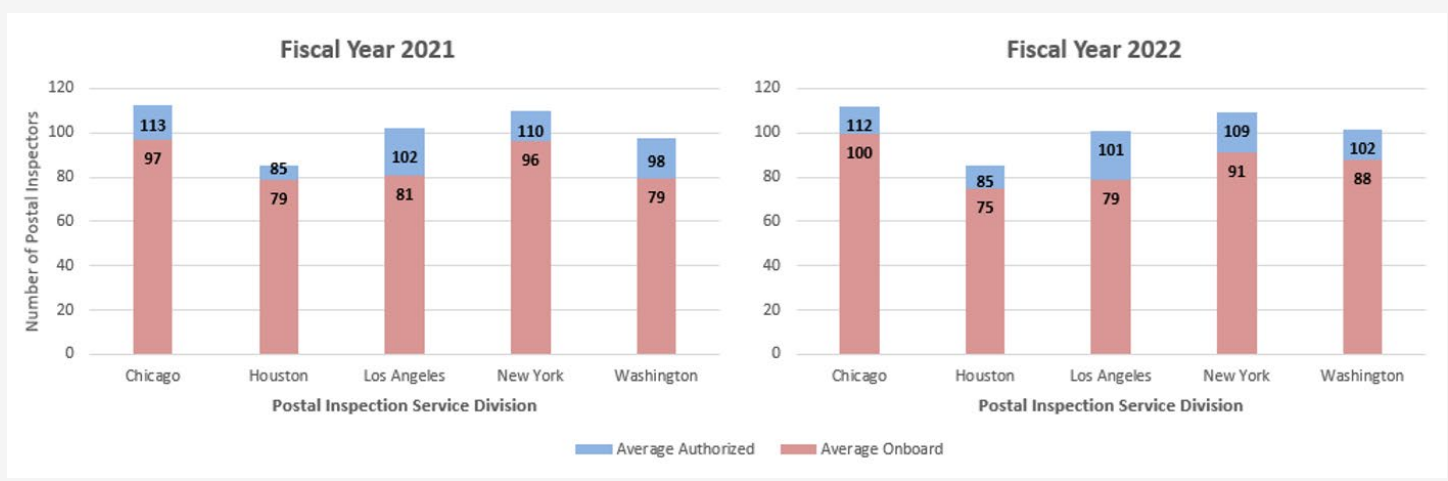
Furthermore, Postal Inspection Service officials stated that although postal inspectors are assigned to specific program areas, they frequently work multiple program area cases. Postal inspectors are expected to assist with specific investigations and respond to emergent incidents – including mail theft and robbery incidents – when needed, regardless of their program assignments. In all divisions, the Postal

Inspection Service had 393 out of 1,167 (34 percent) postal inspectors in FY 2021, and 424 out of 1,142 (37 percent) postal inspectors in FY 2022 who worked mail theft cases. As of July 2023, there were seven³² out of 16 divisions with teams that solely worked mail theft cases. This includes three of the five divisions in our scope,³³ with 38 postal inspectors assigned solely to work mail theft cases within the three divisions.

Division officials we spoke with varied their approach to staffing. Several division officials told us their process to allocate resources to teams is an informal process based on the crime trends in their divisions and the needs communicated to them by their staff. However, one official stated they also document their assessments as part of a more formal process. Further, division officials stated this flexibility allows them to quickly and appropriately address increases in crimes that can vary from region-to-region.

Postal Inspection Service headquarters officials stated that they do not address staffing for specific program areas because leadership in the divisions have the flexibility to assign postal inspectors to any team within their respective division based on need. We believe it is essential for the Postal Inspection Service to assess workforce planning nationally to determine if the Postal Inspection Service has sufficient staffing to achieve its goals.

Figure 5. FYs 2021 and 2022 Postal Inspector Authorized Complement versus Onboard Levels, by Postal Inspection Service Division



Source: Postal Inspection Service staffing data; OIG analysis.

³¹ Sixty-two percent of the respondents entered various other challenges related to mail theft.

³² As of July 2023, mail theft teams that solely worked mail theft cases were in: Chicago (1), Denver (2), Detroit (1), Houston (1), Los Angeles (4), Miami (1), and Philadelphia (3).

³³ Of the divisions we looked at, Chicago, Houston, and Los Angeles had postal inspectors who solely worked mail theft cases.

Special Assistant U.S. Attorney Staffing

Additionally, 58 of 122 (48 percent) Postal Inspection Service staff who completed an OIG survey on mail theft identified challenges with the ability to get mail theft crimes accepted for prosecution. As an example, Postal Inspection Service personnel cited a lack of Assistant U.S. Attorney interest in prosecuting mail theft cases that have limited financial losses.³⁴ We reviewed SAUSA staffing and mail theft cases to determine the reasons why cases were declined for prosecution. We received SAUSA staffing numbers from the Postal Inspection Service and reviewed case file documents directly in CMS. Based on our review of this information, we did not identify issues with SAUSA staffing or the prosecution rates. See [Appendix C](#) for details of our review.

Postal Inspector Training

The Postal Inspection Service provides a Basic Inspector Training that covers aspects of mail theft for all postal inspector candidates.³⁵ Additionally, they offer In-Service Basic Mail Theft training that covers topics such as mail theft history, mail theft data trends, security and eArrow discussions, and database and analytical tool exercises for postal inspectors assigned to mail theft. However, the In-Service Basic Mail Theft training is not required, and field divisions have the discretion to nominate which postal inspectors will attend this training. We found only two of the 38 postal inspectors (5 percent) assigned to solely work mail theft cases had completed the In-Service Basic Mail Theft training. Those who had taken the training did so more than four years ago, in FY 2019. While the In-Service Basic Mail Theft training is not required, one of the benefits in assigning postal inspectors to specific program areas is the ability to train them based on their areas of expertise. This specialized training will be beneficial to postal inspectors assigned to mail theft as the Postal Inspection Service continues to investigate mail theft nationwide.

Mail Theft Analytics Program

In addition to postal inspectors and SAUSAs, the Postal Inspection Service uses contracted resources to support their Mail Theft Program. We found that the Postal Inspection Service did not clearly define the purpose of or establish metrics for overseeing contractor work for their MTAP program. Specifically, MTAP contractors are tasked to read the narrative of FCD complaints, assign the complaint a category, refer complaints to postal inspectors, and respond to investigative requests from postal inspectors in the field. However, we were unable to determine the contributions the MTAP contractors are making to the Mail Theft Program.

The category MTAP contractors assign to a complaint is in addition to any categorizations the customer selected when they submitted the complaint. However, MTAP contractors do not identify duplicative complaints³⁶ and the categorizations³⁷ are not shared with postal inspectors in the field.³⁸ Postal Inspection Service management stated that the analysis is used for informal purposes by headquarters officials.

As noted above, the MTAP contractors can refer complaints to Postal Inspection Service divisions, but the MTAP program manager stated she did not track how many complaints were referred. Based on our review of MTAP complaint data, 57,580 complaints were referred to a Postal Inspection Service division in FYs 2021 and 2022. However, 33 of 92 (36 percent) division personnel we surveyed had rarely or never received a referral from MTAP since October 1, 2020, and neither management nor the MTAP program manager could provide examples of referrals sent to individual postal inspectors. Additionally, we found that only 22 of 1,984 (1 percent) active mail theft cases during FYs 2021 and 2022 were opened based on a referral from MTAP.

Across FYs 2021 and 2022, the Postal Inspection Service spent over \$1 million on the MTAP contractors. However, Postal Inspection Service management did not develop a scope of work or requirements metrics

³⁴ Assistant U.S. Attorneys are employees of the Department of Justice and assist U.S. Attorneys across 94 Federal U.S. Attorneys' office districts to prosecute all criminal and civil cases brought by the Federal government.

³⁵ During the Basic Inspector Training at the Career Development Unit, all postal inspector candidates receive mail theft training via a learning activity packet.

³⁶ For example, one customer submitted 49 complaints about the same package from June 15 to 21, 2022, which was ultimately delivered on June 22, 2022. Each complaint had a unique ID and therefore MTAP did not identify them as duplicative or related to the same incident.

³⁷ MTAP complaint categorization examples include, mail not received, contents missing, fraudulent use of address, and mail tampering.

³⁸ MTAP complaint categorizations are only housed in the application used by MTAP contractors and are not fed back into FCD.

for MTAP contractors to work towards. Additionally, the MTAP program manager confirmed there are no standard operating procedures or other guidance to guide the contractor's work. She also stated that she does not conduct any oversight of the contractors' complaint categorization or disposition selections.

Postal Inspection Service headquarters management stated they were new to their roles and did not know why MTAP did not have a strategy that outlines the program's purpose, objectives, or standard operating procedures.³⁹ Therefore, we calculated over \$1 million of funds that could be put to better use⁴⁰ for MTAP contractor services for FY 2023 through FY 2024.⁴¹ By clearly defining the purpose of the program and ensuring that it has internal controls and performance measures in place, the Postal Inspection Service could improve its understanding of and response to mail theft complaints, and further enhance mail theft analytics.

Recommendation #4

We recommend the **Chief Postal Inspector** finalize the Mail Theft Strategy that is under development by the end of calendar year 2023.

Recommendation #5

We recommend the **Chief Postal Inspector** assess staffing resources available nationwide to support the Mail Theft Program and align resources with their Mail Theft Strategy.

Recommendation #6

We recommend the **Inspector-in-Charge, Criminal Investigations**, require postal inspectors to complete the In-Service Basic Mail Theft training within one year of being assigned to a mail theft team.

Recommendation #7

We recommend the **Inspector-in-Charge, Criminal Investigations**, work with the contracting officer to modify the existing contract and 1) define the Mail Theft Analytics Program purpose to improve complaint data quality and usefulness for division personnel, 2) develop internal controls such as guidance and an oversight mechanism, and 3) establish performance metrics to assess the effectiveness of the program.

Management's Comments

Management disagreed with recommendations 1, 5, 6, 7, and the monetary impact, and agreed with recommendations 2, 3, and 4. See [Appendix D](#) for management's comments in their entirety.

Management disagreed with the monetary impact calculation because they stated the work of the MTAP contractors was to sort, review, and categorize complaints. Additionally, management stated that after reviewing the complaints, MTAP contractors referred many to the Postal Service. However, management noted that while they do not have a written scope of work, purpose, and established metrics for the MTAP contractors, their work supports the purpose and mission of the program.

Regarding recommendation 1, management stated they implemented a plan to deploy 58,250 high security collection boxes in FYs 2023 and 2024 and that replacing over 9 million electronic modified arrow locks would cost over \$2.6 billion in hardware alone. Management also stated that deployment sites for high security collection boxes and electronic modified arrow locks were determined by the Postal Service in conjunction with the Inspection Service for high postal crime areas. Additionally, management stated they will begin their FY 2025 planning to replace additional high security collection boxes and electronic modified arrow locks during the early half of FY 2024 and are continuously researching and testing new solutions for evolving security threats as criminals continue to adapt to current solutions.

Regarding recommendation 2, management stated they recently implemented a semiannual process in RADAR that provides training and video materials on required arrow key procedures and requires local management to certify that they have reviewed the training materials at least twice a year. The target implementation date is November 30, 2023. Management requested closure of this recommendation with the issuance of the final report.

³⁹ The statement of work for the current investigative services contract was completed in July 2021. Postal Inspection Service headquarters officials currently overseeing MTAP assumed their roles in September 2021 and February 2022.

⁴⁰ Funds that could be used more efficiently by implementing recommended actions.

⁴¹ The estimated cost for FY 2023 through FY 2024 is projected based on the cost incurred to the Postal Inspection Service for contractor services provided during the scope of our audit, FYs 2021 and 2022.

Regarding recommendation 3, management stated they recently implemented a monthly arrow key certification mechanism in RADAR that provides Postal Service Headquarters multiple layers of oversight to hold managers and supervisors accountable for following established arrow key policy and training requirements. The target implementation date is November 30, 2023. Management requested closure of this recommendation with the issuance of the final report.

Regarding recommendation 4, management stated they will finalize their Mail Theft Strategy. The target implementation date is September 1, 2024.

Regarding recommendation 5, management stated they will continue to utilize its established processes to assess staffing resources nationwide to support the mail theft program and align its resources with the overall mail theft strategy.

Regarding recommendation 6, management stated that requiring postal inspectors to attend in-service basic mail theft training, within one year of assignment to a mail theft team, negates the value of the postal inspector's experience, on-the-job training, and other training gained in professional conferences. Management also noted resource constraints were not considered and implementation could exclude personnel who do not work full-time in mail theft teams from needed training.

Regarding recommendation 7, management stated that because the full scope of the contract covers the MTAP as well as other programs, it would not be appropriate to modify the existing contract to define the MTAP's purpose, internal controls, and performance metrics. Management believes these components should be documented in a stand-alone standard operating procedure.

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendations 2, 3, and 4 and the actions planned to address the recommendations should resolve the issues identified in this report. We view the disagreement with recommendations 1, 5, 6, and 7 as unresolved and plan to pursue them through the audit resolution process.

Regarding recommendation 1, although management plans to deploy 58,250 collection boxes, they did not identify the number of electronic modified arrow locks they plan to deploy. The OIG is not suggesting the nationwide deployment of all locks, but believes management should develop a plan that identifies proposed quantities, projected costs, and milestones for the high security collection box and electronic modified arrow locks initiatives they intend to deploy. Without a plan that includes these metrics, management is at an increased risk of not addressing known mail theft and carrier robbery security issues.

Regarding recommendation 5, during our exit conference on September 6, 2023, management stated that it assessed nationwide staffing resources annually to align with their Mail Theft Strategy. Management subsequently provided staffing and attrition information; however, this information did not include support for how they analyzed nationwide staffing resources annually to support mail theft. It is essential for management to assess and document workforce planning nationwide to ensure they have sufficient staffing to achieve their goals.

Regarding recommendation 6, as stated in our report, one of the benefits in assigning postal inspectors to specific program areas is the ability to train them based on their areas of expertise. We understand that each inspector has their own experience, on-the-job training, and may attend professional conferences; however, assigning postal inspectors to mail theft with no plan to provide them specialized training as needed could put the Postal Inspection Service at risk of not accomplishing their mission in an effective manner.

Regarding recommendation 7, we believe that modifying the contract to clarify the program's purpose, internal controls, and performance measures to assess the effectiveness of the MTAP will allow management to hold the contractors accountable to a contractually established program and have leverage to take action should responsibilities not be executed as contractually required.

All recommendations require OIG concurrence before closure. The OIG requests written confirmation when corrective actions are completed. Management provided documentation to support the actions taken for recommendations 2 and 3; however, we found it was not sufficient to close the recommendations. Therefore, recommendations 2, 3, and 4 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 our audit included a review of the Postal Service's processes and procedures for addressing mail theft, and the Postal Inspection Service's arrow key reporting, complaints, and cases related to mail theft and carrier robberies from October 1, 2020, through September 30, 2022. We selected five Postal Inspection Service divisions for our review based on open and closed case counts and achieving nationwide coverage: Chicago, Houston, Los Angeles, New York, and Washington, DC.

To accomplish our objective, we:

- Reviewed policies and procedures related to reviewing, reporting, investigating, and processing mail theft and robbery complaints and cases.
- Obtained and analyzed mail theft and robbery complaints and performed reviews of mail theft and robbery Case Management System case files.
- Interviewed Postal Inspection Service headquarter and division management to understand roles and responsibilities for MTAP.
- Interviewed the MTAP program manager and contractors on the complaint intake, review, and referral processes and reviewed contract documentation.
- Conducted a survey of Postal Inspection Service personnel at the five divisions in our audit scope on challenges encountered when investigating mail theft during FYs 2021 and 2022.
- Reviewed findings in 16 recent Mail Delivery, Customer Service, and Property Conditions Review reports to identify issues related to arrow key accountability.
- Obtained and analyzed information about the Postal Service's mail theft response and prevention efforts.

We conducted this performance audit from September 2022 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 September 6, 2023, and included their comments where appropriate.

In planning and conducting the audit, we obtained an understanding of the Postal Service and Postal Inspection Service's 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 the FCD complaints for three complaint types: Postal Service Customer Call Center, Mail Theft Complaint, and On-line Mail Theft Complaint by independently retrieving the data from the system; reviewing the data for completeness, validity, and reasonableness; comparing the data against similar data fields in the MTAP complaint data; and interviewing personnel knowledgeable about the data. We also assessed the reliability of

Case Management System open and closed case data by comparing data provided by the agency to data we retrieved independently from the system, reviewing the data for completeness, validity,

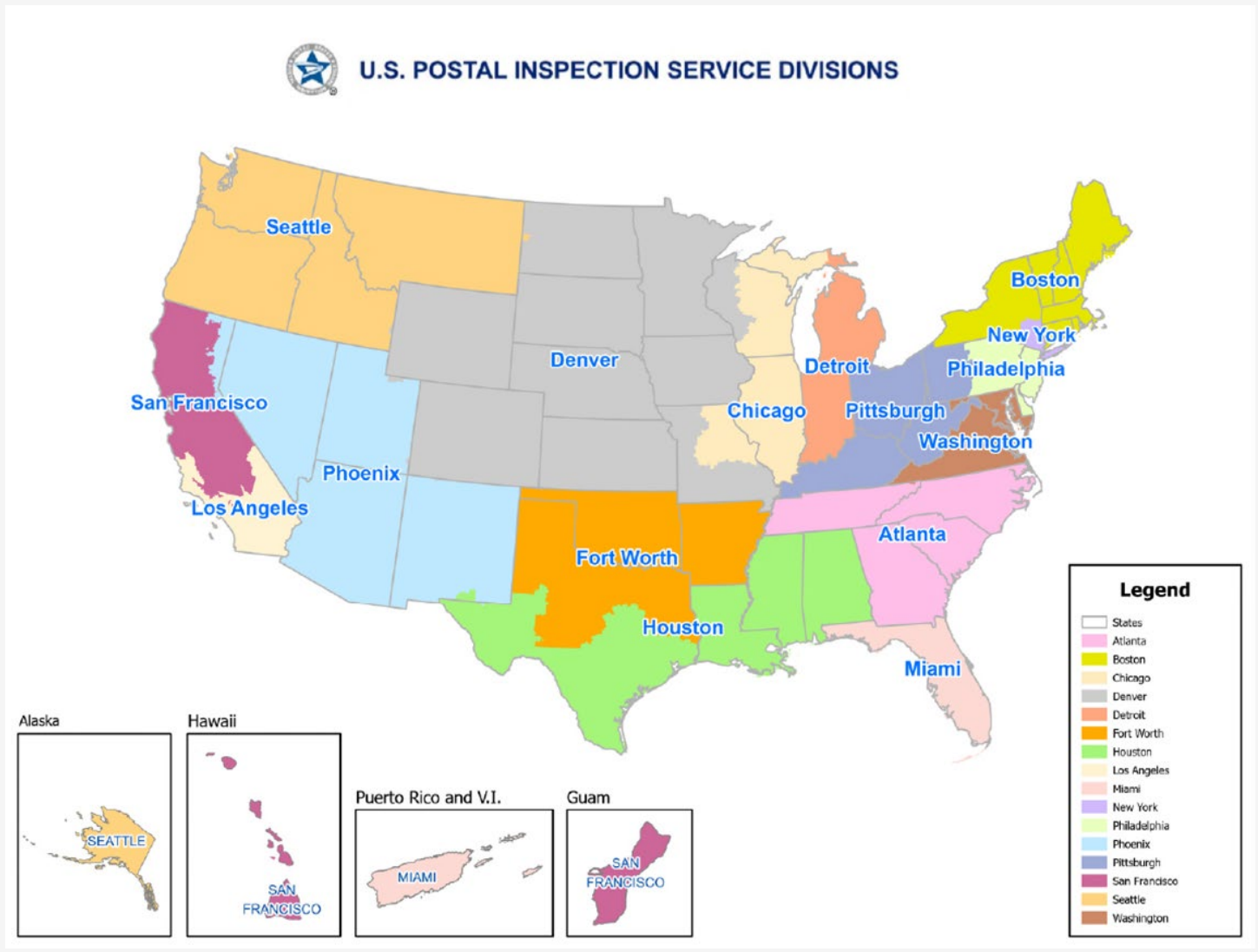
and reasonableness, and interviewing personnel knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Mail Delivery, Customer Service, and Property Conditions Review - Allapattah Station, Miami, FL</i>	Evaluate mail delivery, customer service, and property conditions at the Allapattah Station in Miami, FL.	23-050-1-R23	4/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Doral Branch, Doral, FL</i>	Evaluate delivery, customer service, and property conditions at the Doral Branch in Doral, FL.	23-050-2-R23	4/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Flagler Station, Miami, FL</i>	Evaluate mail delivery, customer service, and property conditions at the Flagler Station in Miami, FL.	23-050-3-R23	4/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Princeton Branch, Homestead, FL</i>	Evaluate mail delivery, customer service, and property conditions at the Princeton Branch in Homestead, FL.	23-050-4-R23	4/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Germantown Station, Philadelphia, PA</i>	Evaluate mail delivery, customer service, and property conditions at the Germantown Station in Philadelphia, PA.	22-208-1-R23	1/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Logan Station, Philadelphia, PA</i>	Evaluate mail delivery, customer service, and property conditions at the Logan Station in Philadelphia, PA.	22-208-2-R23	1/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - North Philadelphia Station, Philadelphia, PA</i>	Evaluate mail delivery, customer service, and property conditions at the North Philadelphia Station in Philadelphia, PA.	22-208-3-R23	1/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Marshallton Branch, Wilmington, DE</i>	Evaluate mail delivery, customer service, and property conditions at the Marshallton Branch in Wilmington, DE.	22-208-4-R23	1/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Edgemoor Branch, Wilmington, DE</i>	Evaluate mail delivery, customer service, and property conditions at the Edgemoor Branch, in Wilmington, DE.	22-208-5-R23	1/10/2023	None

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Mail Delivery, Customer Service, and Property Conditions Review - Lancaster Avenue Station, Wilmington, DE</i>	Evaluate mail delivery, customer service, and property conditions at the Lancaster Avenue Station in Wilmington, DE.	22-208-6-R23	1/10/2023	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - McDonough Main Post Office, McDonough, GA</i>	Evaluate mail delivery, customer service, and property conditions at the McDonough MPO in McDonough, GA.	22-181-1-R23	11/1/2022	None
<i>Mail Delivery, Customer Service, and Property Conditions Review Old National Station, Atlanta, GA</i>	Evaluate mail delivery, customer service, and property conditions at the Old National Station in Atlanta, GA.	22-181-2-R23	11/1/2022	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Stockbridge Main Post Office, Stockbridge, GA</i>	Evaluate mail delivery, customer service, and property conditions at the Stockbridge MPO in Stockbridge, GA.	22-181-3-R23	11/1/2022	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Belleville Annex, Belleville, NJ</i>	Evaluate mail delivery, customer service, and property conditions at the Belleville Annex in Belleville, NJ.	22-170-1-R23	10/19/2022	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Kearny Main Post Office, Kearny, NJ</i>	Evaluate mail delivery, customer service, and property conditions at the Kearny MPO in Kearny, NJ.	22-170-2-R23	10/19/2022	None
<i>Mail Delivery, Customer Service, and Property Conditions Review - Union Post Office, Union, NJ</i>	Evaluate mail delivery, customer service, and property conditions at the Union Post Office in Union, NJ.	22-170-3-R23	10/19/2022	None
<i>U.S. Postal Inspection Service Pandemic Response to Mail Fraud and Mail Theft</i>	Assess the Postal Inspection Service's response to mail fraud and mail theft during the COVID-19 pandemic.	20-305-R21	5/20/2021	None
<i>Arrow Key Management Controls</i>	Assess the effectiveness of the U.S. Postal Service's management controls for arrow keys.	19-033-R20	8/31/2020	None

Appendix B: Postal Inspection Service Divisions



Source: Postal Inspection Service.

Appendix C: Mail Theft and Robberies Case Reviews and Prosecutions

As stated in Finding 3 of this report, we reviewed SAUSA staffing and mail theft cases to determine the reasons why cases were declined for prosecution.

Postal inspectors typically provide all known evidence during presentations for prosecution. Prosecutors have agency priorities or dollar value thresholds regarding case acceptance for prosecution at the Federal and State levels, and determinations for both are at the discretion of each prosecutor. Each prosecutor then makes the determination to take on a case based on the amount and strength of evidence obtained by postal inspectors and the specific elements of the applicable criminal statutes. To assist with case prosecutions, the Postal Inspection Service funds SAUSAs located in various jurisdictions that are assigned to a U.S. Attorney's Office primarily to pursue Postal Service-related cases, such as mail theft cases. SAUSAs work alongside AUSAs to review and then accept or decline cases for prosecution at

the Federal level.⁴² In FY 2021, the Postal Inspection Service had six full-time SAUSAs, which increased to seven in FY 2022.⁴³

We analyzed closed mail theft and robbery cases within our audit scope that were presented to an attorney for prosecution and did not find areas of concern, as 92 percent of mail theft cases and 89 percent of robbery cases presented were accepted for prosecution. Specifically, we reviewed 52 of the 646 (8 percent) mail theft and five of the 47 (11 percent) robbery cases where prosecution was declined for all subjects.⁴⁴ A total of 70 subjects were identified as part of the 52 mail theft cases for which no prosecutorial action was taken. During our review of the case files, we identified the reasons attorneys declined to prosecute and listed the reasons in [Table 2](#) for mail theft cases and [Table 3](#) for robbery cases.

42 The OIG Office of Investigations also hires SAUSAs detailed to several U.S. Attorney's Offices across the country. According to OIG Office of Investigations' officials, in practice, both Postal Inspection Service SAUSAs and OIG Office of Investigations SAUSAs often take all mail theft cases for their U.S. Attorney's office, regardless of which office investigated the case.

43 From FYs 2021 through 2022, the Postal Inspection Service had SAUSAs in place with no vacancies at U.S. Attorney's Offices in Baltimore, Maryland; Camden, New Jersey; Los Angeles and San Francisco, California; Chicago, Illinois; and San Juan, Puerto Rico. As of May 1, 2023, the Postal Inspection Service stated that they had SAUSAs onboard at U.S. Attorney's Offices in Hawaii, Chicago, and Puerto Rico, and three vacant positions posted for Oakland, Los Angeles, and Baltimore. As of May 23, 2023, the OIG Office of Investigations had one SAUSA at U.S. Attorney's Offices in Dallas, Los Angeles, San Francisco, and Puerto Rico; and two SAUSAs onboard in Chicago. They also had one vacancy for a second SAUSA in the U.S. Attorney's Office in Los Angeles.

44 Postal inspectors may recommend the prosecution of individuals or organizations in Federal or State prosecutor's offices. Each case can have one or multiple subjects – that is individuals or organizations – under investigation.

Table 2. Reasons Mail Theft Cases Were Declined for Prosecution for All Subjects by Division

Reason for Declination	Chicago	Houston	Los Angeles	New York	Washington, D.C.	Total
AUSA blanket declination	2*	1	2*	2	1	8
Below minimum dollar threshold	1	3	0	0	0	4
Lack of prosecutive resources	0	2	2	0	1	5
Minimal federal interest or no deterrent value	2	2	4	0	1	9
Staleness of case (too long to investigate)	1	0	5	0	0	6
Subject being prosecuted on other case or charge(s)	0	7*	2	0	0	9
Subject serving sentence on other case or charge(s)	1	1	0	0	0	2
Weak or insufficient evidence**	2	8	5	0	2	17
Other	2	4	7	0	0	13
Total	11	28	27	2	5	73

Source: Postal Inspection Service CMS; OIG analysis.

*For three subjects, their cases were presented and declined at both the Federal and State levels. The reason for declination is counted once for Federal and once for State. (See [Table 5](#)).

**Prosecutors assess evidence based on criminal statutes to determine sufficiency for prosecution.

Table 3. Reasons Robbery Cases Were Declined for Prosecution for All Subjects

Reason for Declination	Count
Weak or insufficient evidence*	3
AUSA blanket declination	2
Total	5

Source: Postal Inspection Service CMS; OIG analysis.

*Prosecutors assess evidence based on criminal statutes to determine sufficiency for prosecution.

In 52 of the 646 (8 percent) mail theft cases and five of the 47 (11 percent) robbery cases, prosecution was declined for all subjects, indicating that no prosecutorial action was taken. We reviewed the Postal Inspection Service’s case files for the 52 mail theft cases for which no prosecutorial action was taken. A total of 70 subjects were identified as part of the 52 mail theft cases for which no prosecutorial action was taken (see [Table 4](#)).

Table 4. Closed Mail Theft Cases Presented for Prosecution by Division

Overview of Closed Cases	Chicago	Houston	Los Angeles	New York	Washington, D.C.	Total
Total # of Closed Mail Theft Cases Presented to a Prosecutor	87	155	208	122	74	646
Total # of Closed Mail Theft Cases Where Prosecution was Declined for All Subjects (percent of closed cases)	9 (10 percent)	20 (13 percent)	18 (9 percent)	1 (1 percent)	4 (5 percent)	52 (8 percent)
Total # of Subjects with Presentations for Closed Mail Theft Cases Where Prosecution was Declined for All Subjects	10	27	26	2	5	70

Source: Postal Inspection Service CMS; OIG analysis.

As shown in Table 5 below, presentations for the 52 mail theft cases occurred at either the Federal or State level and in three instances, cases were presented at both the Federal and State level.

Table 5. Closed Mail Theft Cases Where Prosecution was Declined for All Subjects by Division

Jurisdiction	Chicago	Houston	Los Angeles	New York	Washington, D.C.	Total
Federal	6	19	24	2	5	56
State	5	9	3	0	0	17
Total	11	28	27	2	5	73*
Federal & State*	1	1	1			
Presentations with an Oral or Unsigned Confession	2	1	0	0	0	3
Presentations with a Sworn Statement	0	0	0	0	0	0
Presentations with an Actual/Known Loss Amount & Subject Identified	8	21	6	0	5	40

Source: Postal Inspection Service CMS; OIG analysis.

*For three subjects, their case was presented and declined at both the Federal and State levels. The presentations are counted in the totals for the divisions.

As noted in the report, postal inspectors attempted to present mail theft cases in some instances to both Federal and State prosecutors. For the case in Los Angeles, a local authority initially detained the subject for a moving violation. The local authority then performed a search of the subject’s vehicle

and found burglary tools and approximately 232 pieces of stolen mail and 109 checks bearing the names of others. Per the investigation details in the CMS, the case was initially accepted for Federal prosecution but then was later declined by the prosecutor on February 11, 2020. The Investigation

Details Report did not include a reason for the declination. The case was then presented to a State prosecutor on February 24, 2020, but experienced delays due to COVID. State prosecutors declined the case on January 19, 2021, via a postmarked letter of declination but we were unable to determine the reason for declination.

We also reviewed the case files for five robbery cases for which no prosecutorial action was taken. We found that all five of these robbery cases were in the Washington, D.C. division. We also found that the same subject was listed for two of the five robbery cases; however, the cases were two distinct robbery incidents (see Table 6).

Table 6. Closed Robbery Cases Where Prosecution was Declined for All Subjects

Closed Robbery Cases – Washington, D.C. Division	
Overview:	
Total # of Unique Cases	5
Total # of Subjects	5*
Presentations:	
Federal	1
State	4
Federal & State	0
Total Presentations	5
Presentations with an Oral or Unsigned Confession	0
Presentations with a Sworn Statement	0
Presentations with an Actual/Known Loss Amount & Subject Identified	0

Source: Postal Inspection Service CMS; OIG analysis.
 *The same subject is listed for two cases; however, the cases are two distinct robbery incidences.

Appendix D: Management's Comments



September 22, 2023

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: U.S. Postal Service Response to Mail Theft Report Number 22-178-DRAFT

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft audit report, *U.S. Postal Service Response to Mail Theft*.

Address the Findings:

Finding #1 – Management Disagrees, The Postal Service has implemented an FY23 plan and has an FY24 plan and continues to work with the Inspection Service to analyze data and implement current and new solutions.

Finding #2 – Management Agrees

Finding 3: Postal Inspection Service Mail Theft Strategy

Management disagrees with this finding as it is written. Specifically, management disagrees with the United States Postal Service Office of Inspector General's statement that the U.S. Postal Inspection Service has not conducted a national personnel assessment and assigned staffing resources for the Mail Theft Program. The Postal Inspection Service has in fact done both, which is further explained later in this written response. Management also disagrees with the OIG's statement the Postal Inspection Service did not clearly define the purpose or establish metrics for overseeing the MTAP program. The Inspection Service did define the purpose and some metrics for the MTAP program, which is further explained below, but acknowledges the need to document the purpose and metrics more concretely in writing. Finally, Management disagrees with OIG's stated premise that Postal Inspectors who solely worked mail theft cases should have been required to complete specialized mail theft training. The Postal Inspection Service has a comprehensive training program in place to ensure Postal Inspectors are sufficiently trained to work their respective program assignment(s). This training program is further detailed below.

It is also important to note that responsibility for responding to mail theft is not limited to the U.S. Postal Inspection Service and USPS. Mail theft occurs through a variety of means, including external mail theft, internal mail theft, and a combination of both. The Postal Inspection Service and USPS Office of Inspector General (OIG) have a shared responsibility for addressing mail theft. The Postal Inspection

Service investigates external mail theft, while the OIG investigates internal mail theft. The Postal Inspection Service and OIG jointly investigate matters involving collusive employees. This is evidenced by the Postal Inspection Service regularly referring mail theft customer complaints and allegations indicative of internal mail theft to the OIG. The Postal Inspection Service forwarded to the OIG a combined 8,556 customer complaints and internal mail allegations in FY2021, 5,684 in FY2022, and over 8,760 in FY2023.

In response to the finding about a national personnel assessment and assigned staffing resources for the Mail Theft program, it is important to note the U.S. Postal Inspection Service identifies Postal Inspector workforce needs through continuously monitoring and analyzing staffing and attrition, as well as meeting with field and National Headquarters (NHQ) executives to identify changes in crime statistics/workload, to reallocate resources, and to determine critical hiring needs (including special skills/knowledge). National complement data (which includes onboarding, vacancies, and pending retirements) is provided to the Postal Inspection Service's Chief Postal Inspector and Executive Committee¹ by Business Operations every pay period. All Postal Inspection Service vacancies are evaluated by field Inspectors in Charge (INCs) in consultation with DCIs on a monthly basis. Subsequently, vacancy hirings are posted each month. When selecting new Postal Inspector candidates for Basic Inspector Training (BIT) and 1811 Special Agent transfers, the Chief Postal Inspector and DCIs, in conjunction with field INCs, evaluate vacancy numbers, location, and individual division needs. Within local divisions, resource allocations and changes are made by the INC based on investigative and operational needs. Vacancies are anticipated through assessment of our complement data; and field divisions, as explained throughout the audit, understand, and know the resources they have at their disposal. INCs allocate personnel as they deem necessary to address national and local priorities. These decisions are impacted by numerous factors, including short and long-term local crime trends, local community needs, tactical considerations, and stakeholder considerations, among others. The Postal Inspection Service expects its field INCs to understand their respective and unique local needs, as well as agency priorities, when allocating personnel throughout their respective divisions.

The Chief Postal Inspector and Executive Committee regularly reassess agency needs to respond to and combat a multitude of Postal crimes. This happens formally and informally. For example, every division participates in an annual review, with members of the NHQ leadership team, where case hours are analyzed through four main programmatic areas. This analysis is conducted as part of a broader review of each field division's investigative activities and associated metrics, which further aids in the assessment of personnel and staffing allocation.

In regard to training, the OIG's mandatory one-size-fits-all training approach is not practical and would not meet the needs of the Postal Inspection Service. The Postal Inspection Service undertakes a comprehensive three-pronged approach when

¹ The Executive Committee is composed of the Deputy Chief Inspectors (DCIs), Chief Counsel, and Director of Business Operations.

assessing training needs of field Postal Inspectors: 1) annual Training Needs Analysis, which is used to determine types of training courses and number of course offerings in a fiscal year, 2) field INCs prioritizing personnel training needs for their respective division, and 3) prior training and experience of individual Postal Inspectors. Postal Inspectors receive mail theft training at the Career Development Unit (CDU) during Basic Inspector Training (BIT) and post-basic on-the-job training once they report to the field. Due to resource limitations, it is impractical to ensure all Postal Inspectors, who are part of a sole mail theft team, be required to take additional training. This should be done on a case-by-case basis due to the different skill sets, experience, and criminal investigative background of each Postal Inspector. The Postal Inspection Service also imparts mail theft investigations training on its personnel through a variety of formats, not just through in-person, in-service training classes. OIG's approach negates the experience and background of each individual Postal Inspector. There are 1811 Special Agent transfers who have years of investigative experience and unique skill sets, and, therefore, would not benefit from the in person, in-service mail theft course. For example, if an 1811 transfer from the USPS OIG, who was previously assigned to investigate mail theft, were to take the in-person, in-service mail theft training, it would be of little utility to that individual and a misutilization of resources. Other Postal Inspectors who have worked on different teams, such as prohibited mailings or fraud, also have transferable skills. These Postal Inspectors can assist and teach their peers on new techniques, strategies, and tactics when investigating mail theft cases.

The recommendation requiring all Postal Inspectors in sole mail theft teams to have in-person, in-service mail theft training at CDU, presupposes all 38 identified Postal Inspectors require additional training. The analysis performed did not take a holistic approach and failed to examine each individual Postal Inspector's background, experience, and skill set. The analysis did not consider other reasons why some personnel have not received training, such as the COVID-19 pandemic, which resulted in a pause on in-service training for a variety of programs. Moreover, implementation of this recommendation would also result in unintended consequences due to limited training spots. For instance, Postal Inspectors who investigate mail theft, but are not part of a full-time mail theft team and need the training, may be inadvertently excluded from being able to take the training due to the arbitrary standard the OIG seeks to apply.

Additionally, the Postal Inspection Service routinely sends Postal Inspectors to conferences aimed at training, providing them the latest intelligence, investigative techniques, and resources on mail theft-related issues including fraud, financial, and cybercrime investigations. For example, the Financial Industry Mail Security Initiative (FIMSI), spearheaded by the Postal Inspection Service, hosts two meetings annually² where Postal Inspection Service personnel and various other federal entities, financial and retail investigators, law enforcement personnel, security and retail managers, prosecutors, and others participate. There is also the International Association of Financial Crimes Investigators (IAFCI) organization which holds an annual conference where participants learn about emerging

² Due to the COVID-19 pandemic, FIMSI was postponed from 2020 through 2021.

financial crime trends, new technologies, and advanced investigative techniques from subject matter experts in financial crimes investigations. Through these conferences, Postal Inspectors share knowledge with each other and industry peers. It is critical to note that upon conclusion of the conference or summit, attending Postal Inspectors are expected to present and share with their division the information they acquired at the conference.

Management disagrees with the Monetary Impact Statement

The Monetary Impact report states, “We found that the U.S. Postal Inspection Service did not clearly define the purpose of or establish metrics for overseeing contractor work for their Mail Theft Analytics Program (MTAP).” We fundamentally disagree with this statement, given that in the next sentence, in the same report, OIG describes the work performed by MTAP contractors.

As the report accurately states, on page 4, MTAP has a purpose:

The Postal Inspection Service developed a Mail Theft Analytics Program (MTAP) comprised of five contractors and a program manager. Within MTAP, there are two levels of contractors with different primary responsibilities. Level 1 contractors review FCD complaints from Postal Service customers to determine whether they are mail theft related, properly categorized, and can serve as leads for postal inspectors. Level 2 contractors respond to postal inspectors’ requests for investigative support services.

It is important to note, Level 1 contractors also have the responsibility to determine if the complaints are mail theft related. For example, some Financial Crimes Database (FCD) complaints are customer service issues which are then referred to USPS. In other cases, the complaints fall under the OIG’s jurisdiction and purview, and are referred by MTAP contractors to the OIG³.

Though a written Standard Operating Procedure (SOP) does not exist providing a definition of MTAP, internal controls, and performance metrics, we explained to OIG the work MTAP contractors perform and their daily goals of categorizing and reviewing 100 percent of complaints submitted to FCD. We also provided OIG with FY2021 and FY2022 MTAP data which delineates the number of complaints MTAP contractors sorted, reviewed, and categorized. More specifically, MTAP contractors were tasked to review and categorize approximately 312,892 complaint incidents during FY2021 and approximately 201,969 complaint incidents during FY2022. After reviewing the complaints, MTAP contractors determined some to be more likely related to USPS customer service issues than mail theft, so the following were referred to USPS: 267,911 were referred to USPS in FY2021 and 150,760 were referred to USPS in FY2022. MTAP contractors fulfill their purpose and mission, as provided by the data above.

³ References made to mail theft OIG complaint referrals statistics can be viewed on page 1 of the Management Response Letter.

Therefore, we disagree with OIG's premise that because a scope of work, purpose, and established metrics, for the MTAP contractors, are not currently in writing, it signifies the work is not being conducted or performed by the contractors and that the \$1 million could be spent better elsewhere.

Following are our comments on each of the seven recommendations.

Recommendation [1]:

We recommend the **Chief Technology Officer and Executive Vice President**, develop a plan to include proposed quantities, projected cost, and actionable milestones to fully deploy the eArrow lock and high security mailbox initiatives, and include measures to assess their effectiveness.

Management Response/Action Plan:

Management **disagrees** with this recommendation.

The Postal Service implemented a plan for FY23 and has one for FY24 to deploy High Security Collection Boxes (HSCB) and the electronic Modified Arrow Locks. These deployment sites were determined by CRDO in conjunction with the Inspection Service for high postal crime areas. During the early half of FY24, we will start the process of planning for FY25 on the additional replacements on both collection boxes and locks as appropriate.

For the HSCBs, the plans for FY23 and FY24 will replace 58,250 existing boxes with the new ones.

For locks, the nationwide deployment for all locks (over 9 million) as the OIG is insisting on would cost over \$2.6 B in hardware alone. In addition, the OIG is not taking into account our current nationwide approach of assessing data on postal related crime and working in conjunction with the USPIS and law enforcement.

Finally, the Postal Service is continuously researching and testing new solutions for evolving security threats as criminals continue to adapt to current solutions. For this reason, we must remain flexible and adaptable with our initiatives and measurements.

Target Implementation Date: N/A

Responsible Official:

N/A

Recommendation [2]:

We recommend the **Chief Retail and Delivery Officer and Executive Vice President**, provide new and acting managers and supervisors training on arrow key policies upon assuming their roles and maintain documentation of training attendance.

Management Response/Action Plan:

Management **agrees** with this recommendation. Management recently implemented a semiannual process in RADAR that provides training/video materials on required Arrow Key procedures and that requires local Management to certify at least twice a year that they have reviewed the training materials. Management requests closure of this recommendation with the issuance of the final report.

Target Implementation Date: 11/30/2023

Responsible Official:

Vice President, Retail and Delivery

Recommendation [3]:

We recommend the **Chief Retail and Delivery Officer and Executive Vice President**, develop an oversight mechanism to hold managers and supervisors accountable for following established arrow key policy and training requirements.

Management Response/Action Plan:

Management **agrees** with this recommendation. Management recently implemented a Monthly Arrow Key Certification mechanism in RADAR that provides multiple layers of oversight from Postal Headquarters to the Installation Head and visibility of the data. Management requests closure of this recommendation with the issuance of the final report.

Target Implementation Date: 11/30/2023

Responsible Official:

Vice President, Retail and Delivery

Recommendation [4]: We recommend the **Chief Postal Inspector** finalize the Mail Theft Strategy that is under development by the end of calendar year 2023.

Management Response/Action Plan: Management agrees with this recommendation and will finalize the Mail Theft Strategy.

Target Implementation Date: 09/01/2024

Responsible Official: Chief Postal Inspector

Recommendation [5]:

We recommend the **Chief Postal Inspector** assess staffing resources available nationwide to support the Mail Theft Program and align resources with their Mail Theft Strategy.

Management Response/Action Plan: Management disagrees with this recommendation and will continue to utilize its established processes to assess staffing resources nationwide to support the Mail Theft Program and align its resources with the overall Mail Theft Strategy.

Target Implementation Date: N/A

Responsible Official: Chief Postal Inspector

Recommendation [6]:

We recommend the **Inspector-in-Charge, Criminal Investigations**, require postal inspectors to complete the In-Service Basic Mail Theft training within one year of being assigned to a mail theft team.

Management Response/Action Plan: Management disagrees with this recommendation. Requiring Postal Inspectors to attend Basic Mail Theft Training, within one year of assignment to said team, negates the value of experience, on-the-job training, and other training formats such as training that occurs in professional conferences. It also fails to take into consideration resource constraints that make this unfeasible. Further, implementation of this recommendation may also result in excluding personnel who do not work in full-time mail theft teams from needed training.

Additionally, all Postal Inspectors receive mail theft training within BIT and then receive subsequent on the job training as part of post basic training. Postal Inspectors also receive other training throughout their careers applicable to the mail theft assignment (i.e., online undercover training). The in-service mail theft training, along with other in-person in-service trainings are allocated based on a yearly needs training analysis conducted by CDU.

Target Implementation Date: N/A

Responsible Official: Inspector-in-Charge, Criminal Investigations Group

Recommendation [7]:

We recommend the work with the contracting officer to modify the **Inspector-in-Charge, Criminal Investigations**, existing contract to: 1) define the Mail Theft Analytics Program purpose to improve complaint data quality and usefulness for division personnel, 2) develop internal controls such as guidance and an oversight mechanism, and 3) establish performance metrics to assess the effectiveness of the program.

Management Response/Action Plan: Management disagrees with this recommendation. As discussed, the Postal Inspection Service does agree the purpose of MTAP, internal controls, and performance metrics should be documented in writing through a Standard Operating Procedure (SOP). However, the contract provides the Postal Inspection Service with numerous contractors who provide investigative and administrative support services to the field and NHQ for a variety of criminal programs and administrative operations. The five MTAP contractors represent a miniscule fraction of the full scope of this contract, and modifying the contract is not the appropriate way to document MTAP's purpose, internal controls, and performance metrics. Those should be documented in an MTAP SOP stand-alone document.

Target Implementation Date: N/A

Responsible Official: Inspector-in-Charge, Criminal Investigations Group

E-SIGNED by Gary.R Barksdale
on 2023-09-22 13:20:13 CDT

Gary R. Barksdale
Chief Postal Inspector

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Scott Bombaugh
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Joshua D. Colin, Ph.D.
Chief Retail and Delivery Officer and Executive Vice President

cc: *Corporate Audit & Response Management*

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