

Evaluation of Contract Delivery Services

AUDIT REPORT

Report Number 25-136-R26 | August 18, 2026



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Highlights

Background

Contract Delivery Service (CDS) is a contractual agreement between the U.S. Postal Service and an individual or company for the delivery and collection of mail to and from homes and businesses. CDS routes, operated by suppliers or their employees, were established to provide a cost-effective and efficient solution for the Postal Service, especially in rural areas. In fiscal year (FY) 2025, the Postal Service had more than 8,273 active CDS contracts, which cost approximately \$593 million. Poor management of CDS suppliers can lead to inefficiencies, higher costs, and greater risks of mail loss, damage, or theft, and accidents and injuries due to inadequate enforcement of safety and security measures.

What We Did

Our objective was to evaluate the management, efficiency, and safety of CDS. For this audit, we reviewed CDS operations at ten delivery units nationwide. Additionally, we conducted a random confidential survey of 213 administrative officials (AO) responsible for managing CDS operations.

What We Found

We identified challenges with the management and execution of CDS impacting mail security, carrier safety, and operational efficiency. Specifically, some CDS mail carriers lacked security clearances, while others engaged in unsafe driving practices and there were no requirements for accident reporting. Further, certain carriers did not possess required English language skills to effectively communicate with Postal Service staff and customers. We also found that local management of CDS operations could be improved and identified \$1.9 million in incorrect extra trip payments made annually to suppliers in FYs 2024 and 2025, which resulted from using incorrect rates. Finally, headquarters management's limited oversight and dependence on manual processes restricted visibility into local operations and minimized performance accountability.

Recommendations and Management's Comments

We made four recommendations to address issues regarding safety and security deficiencies. Additionally, we made six recommendations to streamline and improve oversight of CDS operations. Postal Service management agreed with all 10 recommendations. Management's comments and our evaluation are at the end of each finding and recommendation. The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to all recommendations except for recommendations 4 and 5, which we consider partially responsive. For the others, the corrective actions should resolve the issues identified in the report. See [Appendix C](#) for management's comments in their entirety.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

August 18, 2026

MEMORANDUM FOR: JOHN MORGAN
VICE PRESIDENT, DELIVERY OPERATIONS

Mary H. Lloyd

FROM: Mary Lloyd
Deputy Assistant Inspector General
for Operations, Performance, and Service

SUBJECT: Audit Report – Evaluation of Contract Delivery Services
(Report Number 25-136-R26)

This report presents the results of our audit of the Evaluation of Contract Delivery Services.

All recommendations require U.S. Postal Service Office of Inspector General's (OIG) concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

We appreciate the cooperation and courtesy provided by your staff. If you have any questions or need additional information, please contact Laura Roberts, Director, Network Operations Team 2, 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 Evaluation of Contract Delivery Services (Project Number 25-136). Our objective was to evaluate the management, efficiency, and safety of Contract Delivery Services (CDS). See [Appendix A](#) for additional information about this audit.

Background

CDS is a contractual agreement between the U.S. Postal Service and an individual or company for the delivery and collection of mail to and from homes and businesses. The administration of CDS contracts requires close coordination between the Delivery Operations and Transportation Strategy offices. A CDS route may be operated personally by the supplier (owner-operator) or supported by employees hired by the supplier. CDS is designed to provide a cost-effective way for the Postal Service to extend its reach while maintaining control over business expenses. In many cases, these routes also provide an efficient method for delivering mail to communities, especially in rural or underserved areas. These suppliers perform similar functions to Postal Service rural carriers, but without the same oversight.

Supplier compliance and oversight of operational requirements for CDS are the responsibility of the local administrative official (AO) at each delivery unit. Specifically, the AO is responsible for:

- Obtaining screening information from suppliers and the supplier's employees to verify their eligibility to access Postal Service facilities and deliver mail.
- Monitoring supplier's contract performance¹ to ensure compliance with contract requirements and Postal Service policy.

- Documenting any unsatisfactory service or irregularities,² such as late or missed trips and vehicle issues.
- Certifying³ extra trips and detours.
- Performing quarterly inspections of supplier vehicles to ensure vehicles meet the minimum cargo space requirements⁴ of the contract.
- Providing the appropriate training for suppliers.

About 13 percent of the Postal Service's 30,866 delivery units (4,079 units) operated 8,273 CDS routes, which cost approximately \$593 million. Due to new contract agreements and mailbox expansion associated with housing development growth, the number of CDS contracts in FY 2025 increased by 176 contracts (about 2 percent) and costs increased by \$23 million (about 4 percent) compared to FY 2024. See Table 1 and Table 2.

Table 1. FYs 2023-2025 CDS Contract Counts

Fiscal Year	Contracts	Change	% Change
2023	7,984		
2024	8,097	113	1.4%
2025	8,273	176	2.2%

Source: Postal Service Enterprise Data Warehouse (EDW).

Table 2. FYs 2023-2025 CDS Base Contract Costs

Fiscal Year	Contract Costs	\$ Change	% Change
2023	\$ 540,847,948		
2024	\$ 569,376,893	\$ 28,528,946	5.3%
2025	\$ 592,666,753	\$ 23,289,860	4.1%

Source: Postal Service EDW.

¹ AOs monitor performance using Postal Service (PS) Form 5399, *Contract Route Performance Record*.

² AOs document unsatisfactory service or irregularities using PS Form 5500, *Contract Route Irregularity Report*.

³ AOs certify extra trips and detours using PS Form 5429, *Certification of Exceptional Contract Service Performed*.

⁴ Most contracts require cargo space between 120 and 150 cubic feet.

Managing CDS suppliers properly is key to reducing the risk of inefficiencies and costs to the Postal Service. Additionally, if the Postal Service does not enforce proper safety and security measures, there is an increased risk of lost, damaged, or stolen mail and an increased risk of accidents and injuries.

To accomplish our objective, we invited 213 AOs to take part in an U.S. Postal Service Office of Inspector General (OIG) survey.⁵ We surveyed AOs on contractual obligations, operational requirements of CDS routes, and administrative functions related to performance of CDS operations (see [Appendix B](#)).

Findings Summary

We identified issues with the management and execution of CDS impacting mail security, employee

safety, and operational efficiency. Inconsistent security screening and badging created risks for unauthorized access to Postal Service facilities, while the lack of processes for motor vehicle accident reporting and insufficient evaluation of English proficiency further compromised safety and mail security. Additionally, AOs did not consistently manage CDS operations according to policy and some AOs made extra trip payments using the incorrect rate, primarily due to inadequate training and inconsistent headquarters (HQ) guidance. Finally, HQ management's limited oversight and reliance on manual processes resulted in restricted visibility into local operations and performance accountability, leading to inefficiencies and increased costs.

⁵ Our survey response rate was 54 percent (114 of 213). Ninety-three percent of AOs surveyed (106 of 114) indicated that they manage local CDS operations.

Finding #1: Security and Safety Deficiencies

The Postal Service has an opportunity to strengthen employee safety and mail security within its CDS operations. For example, some CDS mail carriers lacked security clearances or badges, while others lacked sufficient English proficiency. Additionally, there was no process for CDS-related motor vehicle accident reporting. Collectively, these issues pose risks to mail security, safety, and the Postal Service's reputation.

Security Clearances and Badges

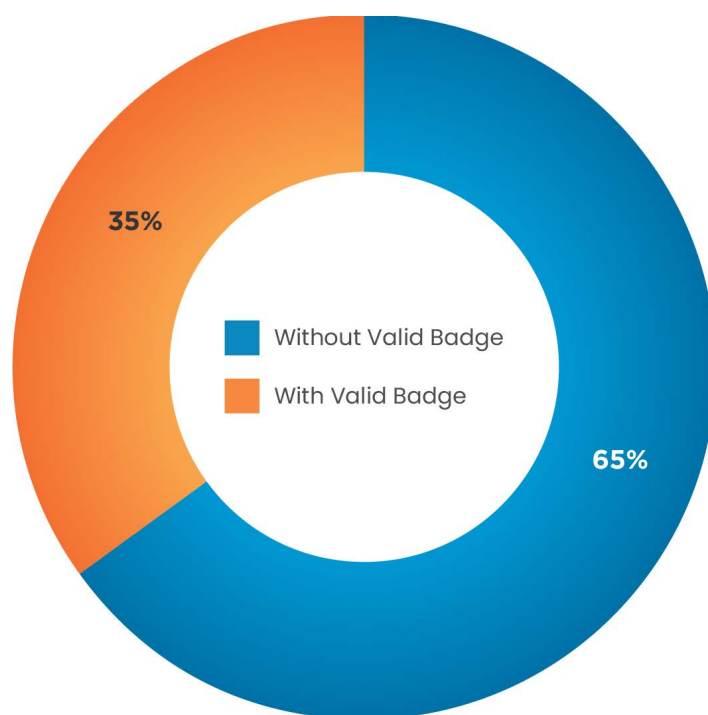
We found significant gaps in the security screening and badging process, which are essential controls intended to verify whether CDS mail carriers are eligible to deliver mail and access Postal Service facilities. A valid badge confirms that a background check was completed, and a security clearance was granted. AOs are responsible for ensuring that each CDS mail carrier meets these requirements.

“As of April 28, 2026, 42 of the 69 CDS mail carriers we interviewed (61 percent) had not been issued a barcode indicating they had not passed or completed a background check.”

Although these requirements were in place, we found that AOs did not fulfill their obligation. We interviewed 69 CDS mail carriers during our site visits.⁶ Of those mail carriers we interviewed, only 24 (about 35 percent) possessed a valid badge, while 45 (about 65 percent) did not (see Figure 1). Among those 45 who did not possess a valid badge, 14 had badges that expired as far back as 2021, whereas 31⁷ did not possess a badge. We also reviewed the

Postal Service's Electronic Barcode System (EBCS) to determine how many CDS mail carriers were issued a barcode,⁸ which is provided only after they are granted with a security clearance. As of April 28, 2026, 42⁹ of the 69 CDS mail carriers we interviewed (61 percent) had not been issued a barcode indicating they had not passed or completed a background check. Due to limitations in available data, we could not determine the nationwide level of CDS supplier compliance with security screening and badging requirements.

Figure 1. Badging Status of Interviewed CDS Mail Carriers



Source: Observations made by the OIG from December 2025 through January 2026.

Our survey results supported these observations, indicating that 36 percent of CDS mail carriers had not received a badge, and 13 percent of AOs had not submitted security clearance paperwork (see [Appendix B](#)).

⁶ Sites were initially selected based on a combination of the highest value of CDS extra trip payments, incorrect CDS extra trip payments, and/or CDS lump sum payments. Additional sites were chosen based on their proximity to the initially selected locations.

⁷ The Postal Service could not verify whether these mail carriers had ever submitted or received security clearances.

⁸ A Postal Service issued barcode located on the supplier's identification badge is required for logging into scanners and capturing scanning activity.

⁹ The Postal Service could not verify whether these mail carriers had ever submitted or received security clearances.

AOs did not ensure CDS carriers had valid badges because they did not understand or follow the required security screening process. At seven of the 10 sites visited, AOs were unfamiliar with the process for obtaining a badge and one AO stated he granted exceptions to several CDS mail carriers to work without approved clearances because they had not been in the United States long enough to pass their security clearance.¹⁰ Additionally, there was no system or controls in place to notify AOs when clearances and badges were approaching expiration or had expired. Missing or expired badges hinder management’s ability to verify if someone is authorized to access Postal Service operational areas or permitted to deliver mail. Additionally, automated notifications would encourage timely action and help maintain compliance with policies and requirements related to access controls. Further, without proper oversight to ensure CDS carriers operate with valid badges, accountability of the carrier is hindered.

As we examined scanning activity across the delivery network, we identified a pattern of irregular badge use across multiple offices. The

“As we examined scanning activity across the delivery network, we identified a pattern of irregular badge use across multiple offices.”

data revealed deviations from required Postal Service badge-control policies, creating gaps in accountability and undermining the accuracy of route-level performance measures. Specifically, FY 2025 data showed 3,792 instances where a single CDS mail carrier’s badge was used to scan mail on two or more delivery routes on the same day (see Table 3). This suggests badge sharing, which is a direct violation of the requirement¹¹ that each carrier use their own badge to scan only the mail assigned to their specific route.

Additionally, accountability issues extended beyond CDS carrier badge sharing. As we expanded our analysis, we found that Postal Service employee badges were used 11,384 times in FY 2025 to log into scanners used by CDS mail carriers (see Table 3). These unauthorized logins resulted in 1,537,529 mail pieces being scanned using credentials that should not have been used on CDS routes. Even more striking, 416,736 of those scans were completed using badges not tied to the local facility or even the region, indicating broader control deficiencies.

Table 3. Unauthorized Badge Sharing FY 2025

Facility	CDS Badge Sharing (Carrier-to-Carrier)	Postal Badge Sharing (Postal-to-Carrier)	Total Unauthorized Badge Sharing Events	Total Mail Pieces Scanned
Bend Detached Carrier Unit, OR	307	340	647	49,433
Bend Sorting & Delivery Center, OR	0	63	63	6,508
Fallon Post Office, NV	4	20	24	704
Ranchos Post Office, NV	95	13	108	47,279
Lecanto Post Office, FL	1,100	6,043	7,143	786,676
Redmond Post Office, OR	0	1,030	1,030	128,040
Steamboat Springs Post Office, CO	805	261	1,066	44,227
Sun River Branch, OR	0	362	362	163,390
Westridge Post Office, NV	1,481	3,252	4,733	311,272
Grand Total	3,792	11,384	15,176	1,537,529

Source: OIG analysis of the Postal Service’s Product Performance Reports, EBCS, and Web Compliment Information System (WebCOINS).

10 The AO did not provide sufficient identifying information for these individuals; therefore, we could not verify whether they were legally authorized to work in the United States.

11 Information Security, Handbook AS-805, dated September 2022.

Using another person's badge for scanning creates inaccurate data, restricting management's ability to monitor scanning performance, which could lead to operational inefficiencies and weakens the reliability of controls meant to safeguard the integrity of CDS operations.

Unsafe Driving Practices and Accident Reporting

We identified safety concerns beyond badge issues when CDS mail carriers were driving their routes. During our site visits, we observed vehicle modifications, such as a brake and gas pedal installed on the front passenger side of the vehicle (see Figure 2) and a CDS carrier delivering the mail while seated on the center console. This poses safety risks, since the driver has less control of the vehicle, and safety features such as airbags and seat belts will not operate as intended.

Figure 2. Mail Carrier Vehicle Modification



Source: OIG photo taken on January 28, 2026, at the Lecanto, FL Post Office.

Although Postal Service policy¹² does not require mail carriers to sit directly behind the steering wheel or to use a seat belt while delivering mail on rural routes, these driving practices may present safety hazards that could potentially endanger Postal Service personnel, CDS mail carriers, and the public, while also exposing the Postal Service to reputational risk. For example, the Postal Service cites national statistics, indicating that more than two-thirds of the annual motor vehicle accidents occur on rural roads, even though less than one-half of the annual miles

driven take place on rural roads.¹³ Compounding this concern is the lack of tracking for motor vehicle accidents involving CDS carriers. In 2024, the Postal Service initiated measures to monitor contractor accidents and fatality data; however, these procedures do not include CDS drivers, making it impossible to assess the safety performance of the CDS program. Limited visibility into CDS driver safety practices can further allow unsafe drivers to continue transporting mail, increasing the risk to other motorists. Postal Service management issued a memorandum in May of 2026, to all CDS suppliers outlining mandatory accident reporting requirements. Therefore, we will not be making a recommendation related to this issue in this report.

Insufficient English Language Proficiency

Language barriers also pose risks. We found that some CDS mail carriers did not have sufficient English proficiency to routinely respond to inquiries from Postal Service personnel and customers despite contract requirements. AOs should assess the suppliers' competence in understanding and speaking English during the preliminary screening process. However, at two of ten sites we visited, we found that some CDS mail carriers could not answer simple questions related to their badge status, vehicle, or delivery practices. Three mail carriers were unable to provide answers to the following questions because they did not understand English:

- Do you have a current badge?
- What type of vehicle do you have?
- Have you made any modifications to your vehicle?
- Have you performed extra trips due to the mail volume?

This occurred because AOs did not effectively evaluate the mail carrier's ability to speak and understand English during the preliminary screening process. Additionally, when suppliers hired additional mail carriers, AOs did not confirm that these individuals could speak and understand English. Beyond general miscommunication, limited English

¹² Handbook PO-603 – *Rural Carriers Duties and Responsibilities*, September 2013.

¹³ PO-515, *Highway Contract Safety*, dated October 2025.

“When the Postal Service does not enforce adequate safety and security measures, the risk of vehicle accidents, employee injuries, and lost, damaged, or stolen mail increases significantly.”

proficiency can impede a carrier’s ability to interpret traffic signs, navigate addresses, process official paperwork, handle emergencies, and effectively communicate with law enforcement or customers.

When the Postal Service does not enforce adequate safety and security measures, the risk of vehicle accidents, employee

injuries, and lost, damaged, or stolen mail increases significantly. Ultimately, systemic gaps in monitoring badge security, driving practices, and language proficiency threaten overall employee safety, mail integrity, and the Postal Service brand. Recent oversight failures have led to significant mail security breaches involving CDS mail carriers, for example, in 2024 the OIG’s Office of Investigations determined:

- A CDS mail carrier, who had not completed a mandatory background check, discarded deliverable mail into a dumpster.
- Multiple CDS mail carriers took mail to their residences to pilfer through and destroy it rather than completing their assigned routes

Recommendation #1

We recommend the **Vice President, Delivery Operations**:

- Require administrative officials to verify all Contract Delivery Service mail carriers have active security clearances and valid badges.

- Terminate access to Postal Service facilities for Contract Delivery Service mail carriers who were denied a security clearance.
- Suspend access to Postal Service facilities for Contract Delivery Service mail carriers that do not submit required security clearance paperwork within 7 days.

Recommendation #2

We recommend the **Vice President, Delivery Operations**, establish an automated process to notify administrative officials when a supplier’s badge is approaching expiration and prompt administrative officials to either submit a renewal package for badge continuation or verify the badge is collected and returned after expiration.

Recommendation #3

We recommend the **Vice President, Delivery Operations**, require administrative officials responsible for managing Contract Delivery Service operations to provide an annual certification validating their understanding of and compliance with security clearance and badging requirements including badge sharing.

Recommendation #4

We recommend the **Vice President, Delivery Operations**, direct administrative officials to enforce language proficiency standards for Contract Delivery Service carriers by:

- Prospective Carriers: Mandating and documenting the evaluation of a carrier’s ability to speak and understand English during the preliminary screening process and wherever subsequent replacement carriers are hired.
- Current Carriers: Establishing a formal re-evaluation process for active carriers suspected of lacking required English proficiency, and revoking facility access for any individuals who fail to meet the standard and cannot successfully remediate the deficiency.

Postal Service Response

Management agreed with finding 1 and recommendations 1, 2, 3, and 4. However, management stated it disagrees with the suggestion in finding 1 that vehicle modifications (partial or full right-hand conversions) are unsafe. Management stated there is no data to substantiate the implication that the referenced vehicle modifications have any bearing on accident rates or employee safety. Additionally, management stated that Postal Service policy allows for right-hand conversion and provides guidance on the use of seat belts.

In response to recommendation 1, management stated it will develop a certification survey requiring all AOs to verify the security status of CDS drivers and to formally adjudicate their existing clearance status. The target implementation date is July 31, 2027.

In response to recommendation 2, management stated it will establish a quarterly certification requiring AOs to verify CDS driver security clearance. Additionally, management stated it will explore the feasibility of establishing a web-based repository to provide visibility of CDS driver clearance status. The target implementation date is July 31, 2027.

In response to recommendation 3, management stated it will retrain AOs on security clearance, badging requirements, and badge sharing. The retraining will include a certification process to confirm compliance with security clearance and badge requirements. The target implementation date is July 31, 2027.

In response to recommendation 4, management stated it will send a memorandum to all AOs reiterating the standard for basic English competency as described in the contract – statement of work and instruct AOs to submit a PS Form 5500, *Contract Route Irregularity Report*, if deficiencies are identified. The target implementation date is July 31, 2027.

OIG Evaluation

Regarding finding 1, the OIG did not determine that vehicle modifications directly caused accidents. Instead, vehicle modifications are referenced as a potential safety risk which enhances the importance of tracking and monitoring motor vehicle accidents involving CDS carriers.

The OIG considers management's comments responsive to recommendations 1, 2, and 3, and action plans to address these recommendations should resolve the issues identified in the report. We consider management's comments partially responsive to recommendation 4.

Regarding recommendation 4, reiterating policy should partially resolve the issues identified in the report. However, management should also require certification that the memorandum was received to confirm AOs have read and understand the requirements for basic English competency. We will follow up with management to address certification requirements in their action plan.

Finding #2: Inconsistent Management of Contract Delivery Service Operations

We identified issues with the local management of CDS operations related to supplier performance tracking and enforcement of vehicle capacity requirements. Additionally, AOs did not always select the correct rate for extra trip payments and payment requests were not always verified prior to payment approval.

Managing CDS Operations

The Postal Service has opportunities to strengthen local oversight of CDS operations. AOs failed to consistently monitor and track supplier performance and did not always verify supplier compliance with contract specifications. Specifically, AOs did not enforce daily performance tracking using PS Form 5399 at four of the 10 sites visited, and AOs at two of the 10 sites did not issue PS Form 5500s when supplier performance issues occurred. When supplier performance is not properly monitored, accountability weakens, and daily route performance may go undocumented, preventing management from validating the need for extra trips or taking corrective action.

Additionally, vehicle capacity checks were not enforced at nine of 10 sites visited. During our site visits we observed 76 CDS vehicles. Thirty of those vehicles (39 percent) did not meet minimum cargo space requirements. When vehicle inspections are not conducted, contractual requirements cannot be enforced, allowing drivers to consistently use smaller vehicles for mail deliveries. This may result in extra trips and service disruptions, and may increase customer dissatisfaction, which adversely affects the Postal Service's brand and reputation.

These issues occurred because AOs were not formally trained or monitored and did not fully understand or follow CDS program requirements. Specifically, HQ management did not consistently provide AOs with guidance on their responsibilities for meeting CDS program requirements or the oversight needed

to ensure AO accountability. AOs reported learning various processes through self-learning and trial-and-error, while others relied on informal conversations or reactive instructions only after problems occurred. Our survey results support these conclusions indicating that 65 percent of AOs had not received any guidance from either

HQ or the national CDS office¹⁴ to help them manage CDS operations. Further, 44 percent of AOs surveyed specifically stated that better communication is needed and 56 percent stated additional training is needed (see [Appendix B](#)).

Extra Trip Payments

Inconsistent oversight of extra trip payment processes resulted in overpayments to CDS suppliers. We found that AOs sometimes chose the incorrect rate when entering CDS extra trip information into the Service Change Request (SCR) system¹⁵ for payment. Our analysis of 53,618 invoices found that the Postal Service paid the incorrect extra trip contract rate for 6,846 of the invoices (about 13 percent).

The Postal Service may negotiate rates (for example, a special rate) for extra trips prior to servicing a contract. If this does not occur, the supplier performs extra trips as ordered and receives compensation at the contract rate. At the beginning of the month, AOs enter and certify suppliers' extra trips in the SCR system for payment to suppliers. AOs are responsible for selecting the proper extra trip rate in the SCR

“Inconsistent oversight of extra trip payment processes resulted in overpayments to CDS suppliers.”

¹⁴ HQ manages CDS operations including approving payments for extra trips while the national CDS office awards and manages contracts.

¹⁵ Postal Service personnel complete PS Form 5429 in the SCR application. The SCR application is an automated tool for submitting and managing requests to add, modify, or delete service related to contractor routes.

system. Once entered into the SCR system, AOs submit the payment request for approval.

Incorrect payment of extra trips occurred because some AOs did not fully understand which rate to choose when entering CDS extra trip information into the SCR system for payment. Additionally, HQ management did not always sufficiently verify extra trip payment requests to ensure the correct rate was applied before approval. As a result of insufficient controls over these processes, we determined that the Postal Service incorrectly paid suppliers for the extra trips they performed during FY 2024 and FY 2025, making about \$3.6 million in overpayments and \$214,000 in underpayments.

Recommendation #5

We recommend the **Vice President, Delivery Operations**, hold administrative officials accountable when they do not:

- Complete and maintain PS Form 5399, *Contract Route Performance Record*.
- Monitor contract route operations and ensure supplier compliance with contract requirements and Postal Service policies.
- Inspect supplier vehicles according to contractual requirements and Postal Service policies.

Recommendation #6

We recommend the **Vice President, Delivery Operations**, provide formal training to all administrative officials responsible for managing Contract Delivery Service operations on properly performing all required duties, and require all newly appointed or detailed administrative officials to complete this training before assuming their duties.

Recommendation #7

We recommend the **Vice President, Delivery Operations**, automate the Service Change Request system to populate the special rate when submitting extra trip payments and require headquarters management to verify extra trip payment requests to ensure the correct rate was applied before approval.

Postal Service Response

Management agreed with finding 2, the monetary impact, and recommendations 5, 6, and 7.

In response to recommendation 5, management stated that it is developing a web-based CDS management support system to house digital forms such as the PS Form 5399, *Contract Route Performance Record*, and vehicle inspection documents. Additionally, management has created a web-based format of the PS Form 5500, *Contract Route Irregularity Report*, to monitor route operations and supplier compliance. The target implementation date is July 31, 2027.

In response to recommendation 6, management stated that it will develop and facilitate training AOs and track to ensure compliance. This training will communicate the objectives, target audience, and reinforce policy requirements. The target implementation date is July 31, 2027.

In response to recommendation 7, management stated that in 2025, the CDS management team was directed to include a special rate in every contract. For contracts written prior to the 2025 directive, special rates will be added at the time of renewal. Additionally, management stated that it has restricted the number of reviewers and approvers. Reviewers and approvers will receive training to ensure proper rates are selected. Further, management stated it will explore the

feasibility of enhancing the SCR system to default to the special rate when users are submitting extra trip payments. The target implementation date is July 31, 2027.

OIG Evaluation

The OIG considers management's comments partially responsive to recommendation 5, and responsive to recommendations 6 and 7. Action plans to address recommendations 6 and 7 should resolve the issues identified in the report.

Regarding recommendation 5, although implementing a CDS management support system will increase visibility within the CDS program, Postal Service management should also develop accountability measures to ensure supplier performance and adherence to contractual requirements are enforced. We will follow-up with management to include accountability measures in their action plan.

Finding #3: Inefficient Contract Delivery Service Processes

The oversight challenges AOs faced extended beyond safety and security issues, performance tracking, and payment accuracy. At many sites, the fundamental processes used to manage CDS operations were slow, manual, and disconnected.

Manual Processes

AOs are required to use hard copies of PS Form 5399 to track daily CDS performance, PS Form 5500 to document supplier irregularities and corrective actions, and PS Form 8145 to conduct and record quarterly vehicle inspections. While these forms support performance and contractual compliance, there is no requirement to submit these hardcopy forms to HQ or maintain the forms in a central repository. As a result, many AOs did not consistently complete the required forms as reflected in our survey results. Specifically, 44 percent of AOs reported that they had never completed PS Form 5399s, and 4 percent stated that they had not issued PS Form 5500s. Additionally, 13 percent indicated they had never conducted a vehicle inspection using PS Form 8145 (see [Appendix B](#)).

These issues occurred because the CDS program does not have a centralized or digital system for inputting information to track compliance and performance related to supplier irregularities, corrective actions, and quarterly vehicle inspections. Therefore, HQ management could not provide the level of oversight needed to ensure consistent management of the CDS program. Effective management oversight controls involve collaboration on the design, implementation, and operation of the internal control system to ensure goals are met, resources are used efficiently, and risks are managed appropriately. By maintaining clear lines of accountability and regularly reviewing processes, management can identify potential issues early and implement corrective actions. Instead, the CDS program relies on manual processes, which limited HQ management's visibility and ability to monitor AO performance to ensure they met program requirements.

As a result, issues can go undetected and AO performance cannot be effectively monitored. When AO performance is not properly monitored, HQ cannot effectively oversee the CDS program, which reduces operational efficiency and results in additional costs for extra trips and service disruptions. Finally, without proper oversight, there are increased opportunities for fraud and collusion between local management and suppliers.

Route Surveys

We found that AOs did not perform route surveys as needed. Route surveys are used to obtain current and accurate route information. This information is then used to identify and implement necessary changes on the route to improve efficiency and economy of service. However, route surveys were not completed at seven of 10 sites we visited, and our survey found that 58 percent of AOs surveyed had never performed CDS route surveys (see [Appendix B](#)). At one site we visited, mail carriers were unable to fulfill their scheduled contract times due to higher mail volumes and an increase in delivery points than originally outlined in their CDS contract. This issue could have been addressed by conducting route surveys and subsequently adjusting the contract requirements to account for the changes to the route information.

Route surveys were not always conducted partly because AOs are recommended, but not required, to complete them. When route surveys are not conducted as needed, route information becomes outdated, leading to differences between the workload specified in the contract and the actual work being performed. This may result in extra trips, service disruptions, challenges in verifying a supplier's contractual compliance, and a rise in customer dissatisfaction, which may negatively impact the Postal Service's brand and reputation.

Recommendation #8

We recommend the **Vice President, Delivery Operations**, implement monitoring tools to strengthen oversight of administrative officials and enforce compliance with policies for managing Contract Delivery Service operations.

Recommendation #9

We recommend the **Vice President, Delivery Operations**, evaluate opportunities to streamline manual administrative official processes, including through automation, and require them to be completed uniformly across all Contract Delivery Service offices.

Recommendation #10

We recommend the **Vice President, Delivery Operations**, update policy to require administrative officials to conduct route surveys annually and when new developments occur, such as changes in the number of delivery points, mail volume, route mileage, or the scheduled time needed to complete the route due to local community growth.

Postal Service Response

Management agreed with finding 3 and recommendations 8, 9, and 10.

In response to recommendation 8, management stated that it is developing a web-based CDS management support system to house digital forms such as the PS Form 5399, *Contract Route*

Performance Record, and vehicle inspection documents. Additionally, management has created a web-based format of the PS Form 5500, *Contract Route Irregularity Report*, to monitor route operations and supplier compliance. The target implementation date is July 31, 2027.

In response to recommendation 9, management stated that it is developing a web-based CDS management support system to house digital forms such as the PS Form 5399, *Contract Route Performance Record* and vehicle inspection documents. Additionally, management has created a web-based format of the PS Form 5500, *Contract Route Irregularity Report*, to monitor route operations and supplier compliance. The target implementation date is July 31, 2027.

In response to recommendation 10, management stated that the AO or the supplier can request a survey at any time under the current policy. Additionally, management will update the policy to require that surveys are conducted at least once per year. The target implementation date is July 31, 2027.

OIG Evaluation

The OIG considers management's comments responsive to recommendations 8, 9, and 10, and corrective action should resolve the issues identified in the report.

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Appendix A: Additional Information

Scope and Methodology

Our audit scope included a review of CDS operations. Specifically, we analyzed costs for FYs 2023–2025. In addition, we performed an assessment of vehicle requirements, and driver safety and security for CDS suppliers.

To accomplish our objective, we:

- Reviewed written laws, regulations, and policies and procedures governing CDS contracts and operations.
- Reviewed CDS contract terms related to the use of extra services (extra hours and extra trips).
- Obtained, analyzed, and trended CDS lump sum supplier payments for reasonableness.
- Obtained and analyzed delivery scanning data for CDS routes.
- Interviewed Postal Service personnel responsible for managing CDS contracts.
- Interviewed Postal Service personnel responsible for managing CDS operations.
- Analyzed the Postal Service’s management and administration of security clearances for CDS suppliers and mail carriers.
- Identified policies and procedures for monitoring safety and security processes for CDS mail carriers.
- Identified the suppliers nationwide with the:
 - Highest annual contract rates.
 - Highest lump sum payments.
 - Highest extra hours and extra trip costs.
- Conducted judgmental site visits during December 2025 and January 2026 to observe CDS operations at the following locations:
 - Bend Sorting & Delivery Center, OR.
 - Bend Detached Carrier Unit, OR.
 - Sun River Branch, OR.
 - Redmond Post Office, OR.
 - Ranchos Post Office, NV.
 - Fallon Post Office, NV.
 - Westridge Post Office, NV.
 - Steamboat Springs Post Office, CO.
 - Golden Sorting & Delivery Center, CO.
 - Lecanto Post Office, FL.
- Interviewed administrative officials at post offices to determine their monitoring and oversight responsibilities for the CDS program.
- Conducted a survey of 213 AOs identified as having responsibilities related to CDS operations.

We conducted this performance audit from September 2025 through August 2026 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on July 16, 2026, and included their comments where appropriate.

In planning and conducting the audit, we obtained an understanding of the contract delivery services 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 five components were significant to our audit objective:

- Control Environment
- Risk Assessment
- Control Activities
- Information and Communication
- Monitoring

We developed audit work to ensure that we assessed these controls. Based on the work performed, we

identified internal control deficiencies related to the control environment, risk assessment, control activities, information and communication, and monitoring that were significant within the context of our objective. Our recommendations, if implemented, should correct the weaknesses we identified.

We evaluated the reliability of the data by reviewing contract-rate and special-rate information, as well as extra-trip payments, within the Transportation Contract Support System. We also assessed scanning compliance using data from EDW, WebCOINS, and EBCS. To further verify data accuracy, we interviewed Postal Service officials and performed logical tests on selected data fields. This included comparing scan data in the electronic files to corresponding data in EDW, EBCS, and WebCOINS. Based on these procedures, we determined the data was sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Transportation Workplace Safety and Driver Security</i>	To assess the safety and security of U.S. Postal Service's surface transportation network.	23-055-R23	September 26, 2023	\$0
<i>Contract Delivery Service Cost Attribution</i>	To assess whether all contract delivery service (CDS) costs are reliably captured and attributed to mail products and services.	20-313-R21	June 21, 2021	\$0
<i>Contract Delivery Service Costs</i>	To assess the effectiveness of controls over the management of contract delivery services (CDS) and costs.	CP-AR-19-002	August 20, 2019	\$5,375,720

Appendix B: Contract Delivery Service Survey

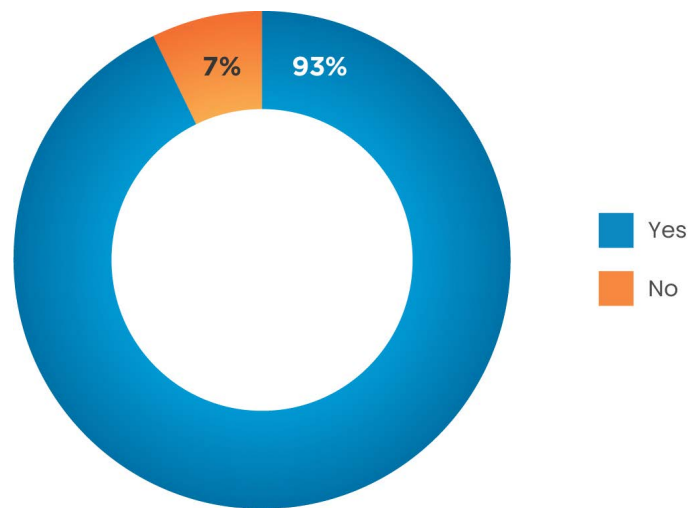
We randomly selected 213 postmasters¹⁶ who manage CDS operations to participate in an OIG survey¹⁷ about their experiences managing local CDS operations. The survey contained 15 questions related to the following:

- Security clearances
- Badges
- Statements of Work
- Vehicle requirements
- Vehicle inspections
- Vehicle modifications
- Route surveys
- Contract Route Irregularity Report (PS Form 5500)
- Contract Route Performance Record (PS Form 5399)
- Guidance from HQ and/or the national CDS office
- CDS program improvements
- CDS program feedback

1. CDS Operations

Ninety-three percent of AOs surveyed (106 of 114) indicated that they manage local CDS operations. However, 7 percent (8 of 114) indicated that they do not manage CDS operations (see Figure 3).

Figure 3. AOs Responses on CDS Operations

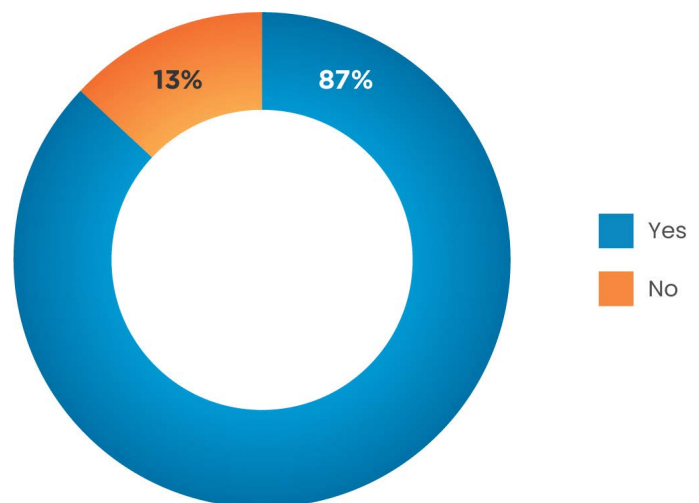


Source: OIG survey results.

2. Security Clearances

Eighty-seven percent of AOs surveyed (92 of 106) indicated that they submitted security clearance paperwork for all CDS mail carriers at their local facility. However, 13 percent (14 of 106) indicated that they had not submitted security clearance paperwork (see Figure 4).

Figure 4. AOs Responses on Security Clearances



Source: OIG survey results.

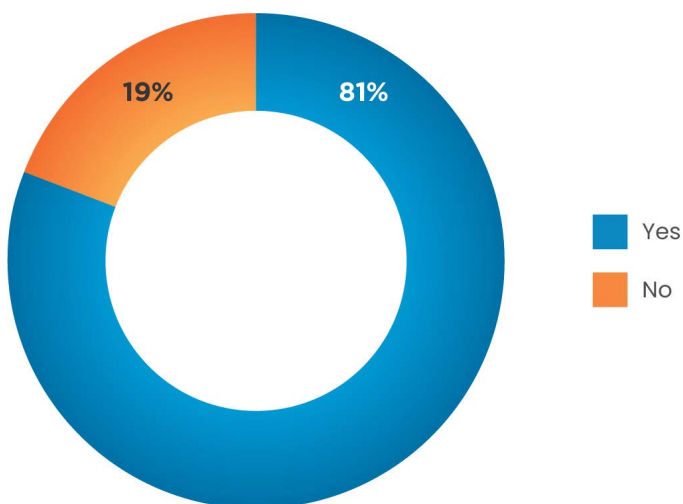
¹⁶ Postmasters are typically the AOs for CDS operations.

¹⁷ Our survey response rate was 54 percent (114 of 213). Question one received 114 responses, and questions two through 14 received 106 responses. Additionally, question 15 solicited feedback regarding CDS operations—such as training, communication from HQ, and CDS processes.

3. Mail-Carrier Eligibility

Eighty-one percent of AOs surveyed (86 of 106) indicated that they had received a response from the U.S. Postal Inspection Service on mail carrier eligibility. However, 19 percent (20 of 106)¹⁸ indicated that they had never received a response on mail carrier eligibility (see Figure 5).

Figure 5. AOs Responses on Mail-Carrier Eligibility

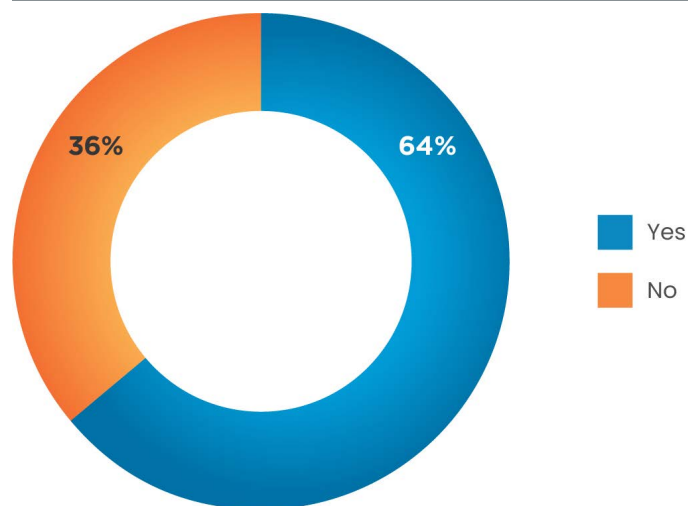


Source: OIG survey results.

4. Mail-Carrier Badges

Sixty-four percent of AOs surveyed (68 of 106) indicated that mail carriers had received a Postal Service badge to access Postal Service facilities. However, 36 percent (38 of 106) indicated that mail-carriers had not received a badge (see Figure 6).

Figure 6. AOs Responses on Mail Carrier Badges

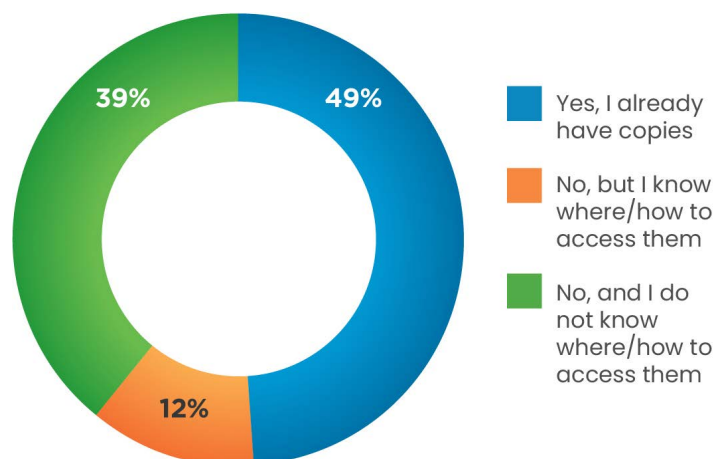


Source: OIG survey results.

5. Statement of Work

Forty-nine percent of AOs surveyed (52 of 106) indicated that they have copies of the Statement of Work for the routes they administer. Twelve percent of AOs surveyed (13 of 106) indicated that they know where and how to access the Statement of Work. However, 39 percent (41 of 106) indicated that they do not know where or how to access the Statement of Work (see Figure 7).

Figure 7. AOs Responses on Statement of Work



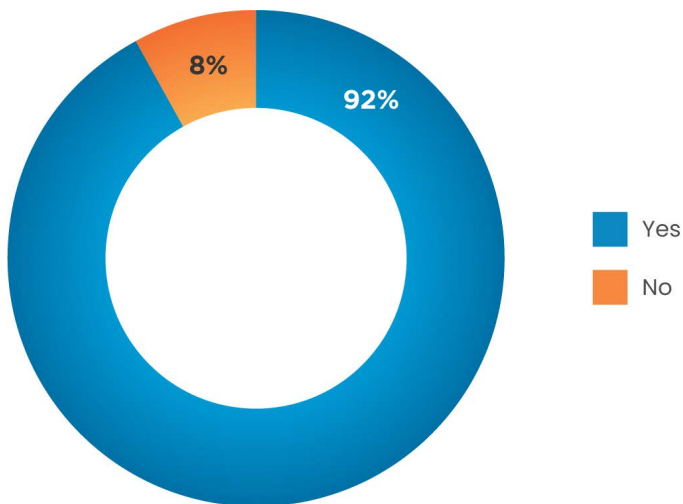
Source: OIG survey results.

¹⁸ Due to the anonymous nature of the survey, we were unable to determine whether the 14 AOs who indicated that they had not submitted security clearance paperwork in question 2 also indicated that they had never received a response from the U.S. Postal Inspection Service on mail carrier eligibility in question 3.

6. Vehicle Size Requirement

Ninety-two percent of AOs surveyed (97 of 106) indicated that they were aware of the minimum vehicle size requirement outlined in CDS contracts. However, 8 percent (9 of 106) indicated that they were not aware of vehicle size requirements (see Figure 8).

Figure 8. AOs Responses on Vehicle Size Requirement

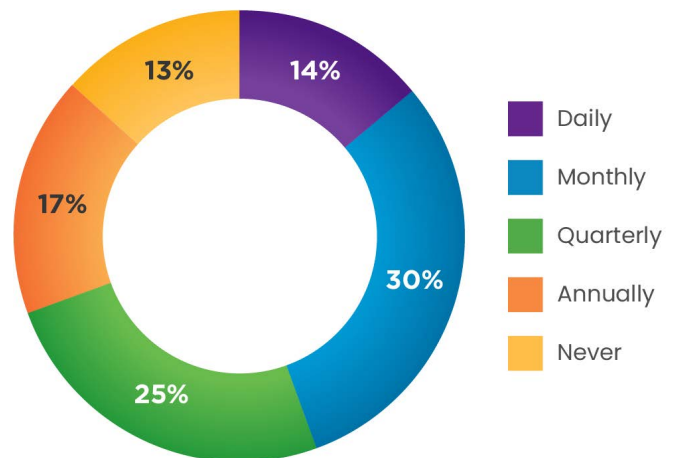


Source: OIG survey results.

7. Mail-Carrier Vehicle Inspections

Fourteen percent of AOs surveyed (15 of 106) indicated that they inspect mail carrier vehicles daily, 30 percent (32 of 106) indicated that they inspect mail carrier vehicles monthly, 25 percent (27 of 106) indicated that they inspect mail carrier vehicles quarterly, 17 percent (18 of 106) indicated that they inspect mail carrier vehicles annually. However, 13 percent (14 of 106) indicated that they never inspect mail-carrier vehicles (see Figure 9).

Figure 9. AOs Responses on Mail-Carrier Vehicle Inspections

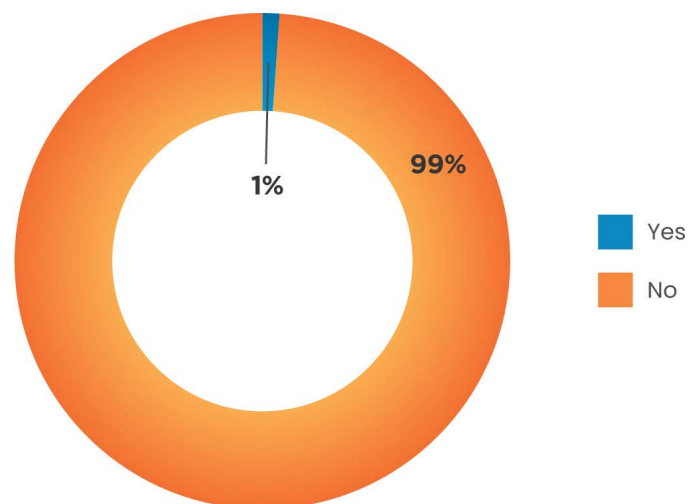


Source: OIG survey results.

8. Unsafe Vehicle Modifications

Ninety-nine percent of AOs surveyed (105 of 106) indicated they had not observed unsafe vehicle modifications. However, one percent (1 of 106) indicated they had observed unsafe vehicle modifications (see Figure 10).

Figure 10. AOs Responses on Unsafe Vehicle Modifications



Source: OIG survey results.

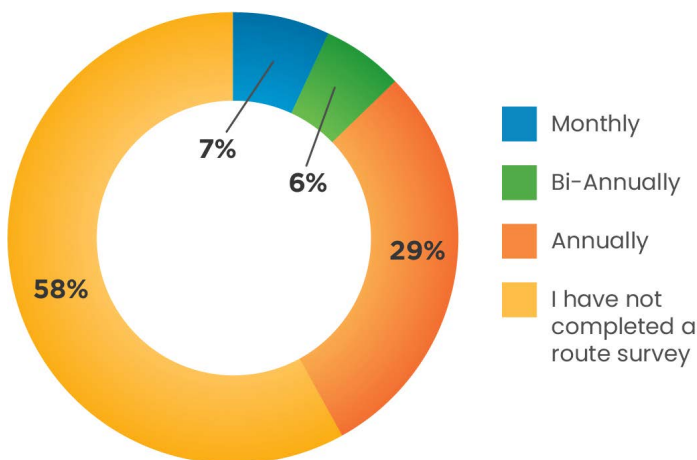
9. If the answer to the previous question regarding unsafe vehicle modifications (question 8) was "yes," provide additional details.

One percent of AOs surveyed stated that they observed mail-carriers not wearing seatbelts.

10. Route Surveys

Seven percent of AOs surveyed (7 of 106) indicated that they perform CDS route surveys monthly, 6 percent (6 of 106) indicated that they perform CDS route surveys bi-annually, 29 percent (31 of 106) indicated that they perform CDS route surveys annually. However, 58 percent (62 of 106) indicated that they never perform CDS route surveys (see Figure 11).

Figure 11. AOs Responses on Route Surveys

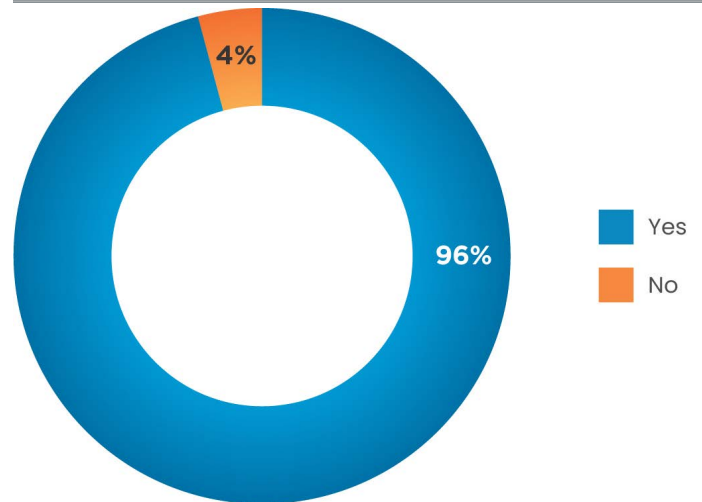


Source: OIG survey results.

11. Contract Route Irregularity Reports (PS Form 5500)

Ninety-six percent of AOs surveyed (102 of 106) indicated that they issue Contract Route Irregularity reports (PS Form 5500) when CDS suppliers do not comply with contractual obligations. However, four percent (4 of 106) indicated that they had not issued Contract Route Irregularity reports (see Figure 12).

Figure 12. AOs Responses on PS Form 5500

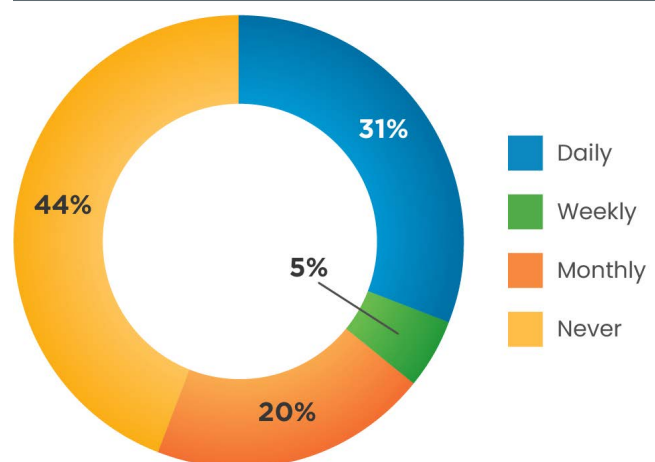


Source: OIG survey results.

12. Contract Route Performance Records (PS Form 5399)

Thirty-one percent of AOs surveyed (33 of 106) indicated that they complete Contract Route Performance Records (PS Form 5399) daily to track CDS mail carrier performance, 5 percent (5 of 106) indicated that they complete Contract Route Performance Records weekly, and 20 percent (21 of 106) indicated that they complete Contract Route Performance Records monthly. However, 44 percent (47 of 106) indicated that they had never completed Contract Route Performance Records (see Figure 13).

Figure 13. AOs Responses on PS Form 5399

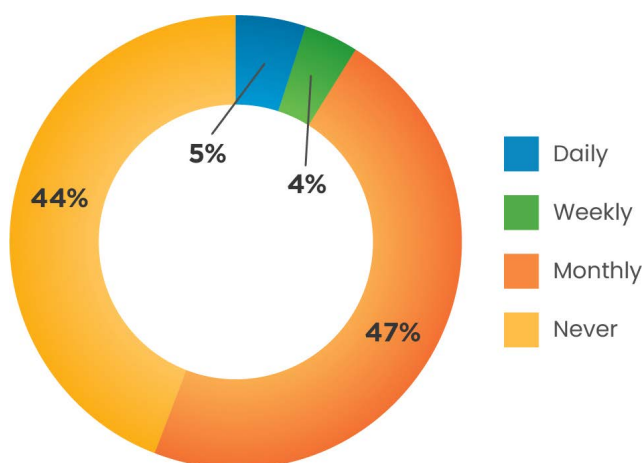


Source: OIG Ssurvey results.

13. Certification of Exceptional Contract Service Performed Forms (PS Form 5429)

Five percent of AOs surveyed (5 of 106) indicated that they submit PS Forms 5429 in the SCR system daily for CDS extra trip payments. Four percent (4 of 106) indicated that they submit the forms weekly, and 47 percent (50 of 106) indicated that they submit the forms monthly. However, 44 percent (47 of 106) indicated that they never submit PS Forms 5429 in the SCR system (see Figure 14).

Figure 14. AOs Responses on PS Form 5429

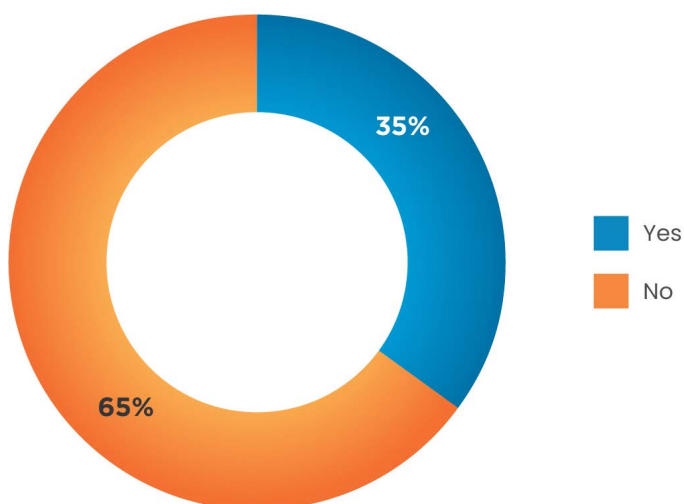


Source: OIG survey results.

14. Headquarters and National CDS Office Guidance

Thirty-five percent of AOs surveyed (37 of 106) indicated that they had received guidance from either HQ or the national CDS office to help them manage CDS operations. However, 65 percent (69 of 106) indicated that they had not received any guidance (see Figure 15).

Figure 15. AOs Responses on Headquarters or National CDS Office Guidance



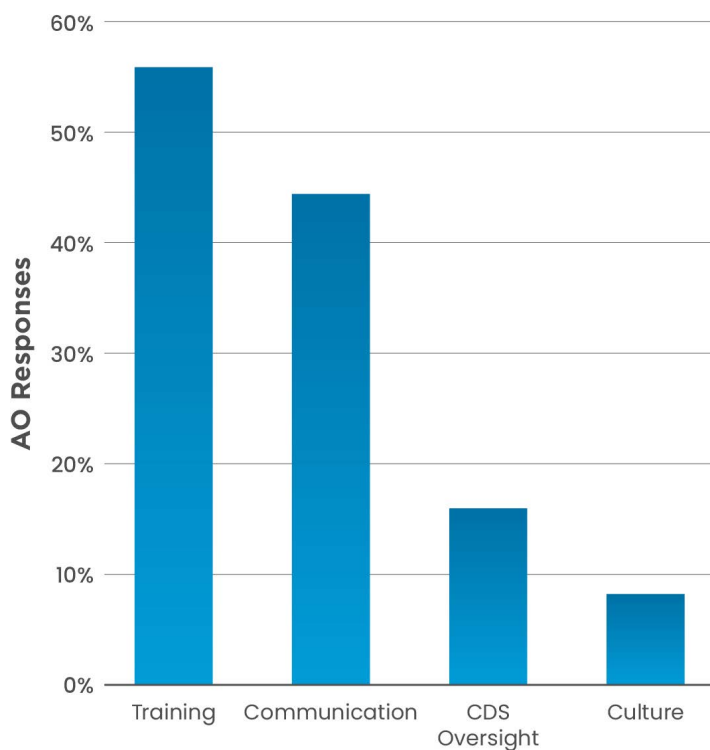
Source: OIG survey results.

15. Feedback on CDS Program

A total of 106 open-ended responses were collected for this question. The audit team analyzed the feedback and grouped it into four predominate categories—training, communication, CDS oversight, and culture. Several responses spanned more than one category, and some did not align with any category.

Fifty-six percent of AOs surveyed (59 of 106) stated that additional training is needed. Forty-four percent of AOs surveyed (47 of 106) stated that better communication is needed. Sixteen percent of AOs surveyed (17 of 106) stated that better oversight from HQ and the national CDS office is needed. Eight percent of AOs surveyed (9 of 106) indicated an unfavorable culture surrounding the CDS program (see Figure 16).

Figure 16. OIG Analysis of AOs Feedback on the CDS Program



Source: Analysis of OIG survey results.

Appendix C: Management's Comments



August 10, 2026

LAURA LOZON
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: *Evaluation of Contract Delivery Services* (25-136-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and conclusions contained in the draft audit report, *Evaluation of Contract Delivery Services*.

Management generally agrees with the findings of the report but disagrees with the suggestion in finding #1 that vehicle modifications (partial or full right-hand conversions) are unsafe. There is no data to substantiate the implication that the referenced vehicle modifications have any bearing on accidents rates or employee safety. Postal Service policy allows for right hand conversion and provides guidance on the use of seat belts. The report references *Handbook PO-603 - Rural Carriers Duties and Responsibilities*, September 2013. Management agrees with the monetary impacts identified in finding #2 for extra trip payments.

The following are our comments on each of the ten recommendations.

Recommendation 1:

We recommend the Vice President, Delivery Operations:

- Require administrative officials to verify all Contract Delivery Service mail carriers have active security clearances and valid badges.
- Terminate access to Postal Service facilities for Contract Delivery Service mail carriers who were denied a security clearance.
- Suspend access to Postal Service facilities for Contract Delivery Service mail carriers that do not submit required security clearance paperwork within 7 days.

Management Response/Action Plan:

Management agrees with this recommendation.

Management will create a certification survey for all (Administrative Officials) AOs to verify Contract Delivery Service (CDS) driver security status and adjudicate to determine existing clearance status.

Target Implementation Date: 07/31/2027

Responsible Official:

Director, Rural Delivery

Recommendation 2:

We recommend the Vice President, Delivery Operations, establish an automated process to notify administrative officials when a supplier's badge is approaching expiration and prompt administrative officials to either submit a renewal package for badge continuation or verify the badge is collected and returned after expiration.

Management Response/Action Plan:

Management agrees with this recommendation.

Establish a quarterly certification requiring AOs to verify CDS driver security clearance. Management will explore the feasibility of establishing a web-based repository to provide status and visibility of CDS driver clearance status.

Target Implementation Date: 07/31/2027

Responsible Official:

Director, Rural Delivery

Recommendation 3:

We recommend the Vice President, Delivery Operations, require administrative officials responsible for managing Contract Delivery Service operations to provide an annual certification validating their understanding of and compliance with security clearance and badging requirements including badge sharing.

Management Response/Action Plan:

Management agrees with this recommendation.

Management will retrain AOs on security clearance and badging requirements including badge sharing with a certification process.

Target Implementation Date: 07/31/2027

Responsible Official:

Director, Rural Delivery

Recommendation 4:

We recommend the Vice President, Delivery Operations, direct administrative officials to enforce language proficiency standards for Contract Delivery Service carriers by:

- Prospective Carriers: Mandating and documenting the evaluation of a carrier's ability to speak and understand English during the preliminary screening process and wherever subsequent replacement carriers are hired.
- Current Carriers: Establishing a formal re-evaluation process for active carriers suspected of lacking required English proficiency, and revoking facility access for any

individuals who fail to meet the standard and cannot successfully remediate the deficiency.

Management Response/Action Plan:

Management agrees with this recommendation.

Management will send a memo to all AOs reiterating the standard for basic English competency as described in the contract - statement of work and instruct the AOs to submit a PS Form 5500, "Contract Route Irregularity Report" if deficiencies are identified.

Target Implementation Date:07/31/2027

Responsible Official:

Director, Rural Delivery

Recommendation 5:

We recommend the Vice President, Delivery Operations, hold administrative officials accountable when they do not:

- Complete and maintain PS Form 5399, *Contract Route Performance Record*.
- Monitor contract route operations and ensure supplier compliance with contract requirements and Postal Service policies.
- Inspect supplier vehicles according to contractual requirements and Postal Service policies.

Management Response/Action Plan:

Management agrees with this recommendation.

Management is working to develop a web-based CDS management support system to house digital forms such as PS Form 5399 and vehicle inspection documents. To monitor route operations and supplier compliance, management has created a web-based format of the PS Form 5500 "Contract Route Irregularity Report".

Target Implementation Date: 07/31/2027

Responsible Official:

Director, Rural Delivery

Recommendation 6:

We recommend the Vice President, Delivery Operations, provide formal training to all administrative officials responsible for managing Contract Delivery Service operations on properly performing all required duties, and require all newly appointed or detailed administrative officials to complete this training before assuming their duties.

Management Response/Action Plan:

Management agrees with this recommendation.

Management will develop and facilitate training for all AOs and track for compliance. This training will communicate the objectives, target audience, and reinforce policy requirements.

Target Implementation Date: 07/31/2027

Responsible Official:
Director, Rural Delivery

Recommendation 7:

We recommend the Vice President, Delivery Operations, automate the Service Change Request system to populate the special rate when submitting extra trip payments and require headquarters management to verify extra trip payment requests to ensure the correct rate was applied before approval.

Management Response/Action Plan:

Management agrees with this recommendation.

In 2025, the CDS management team was directed to include a special rate in every contract written. For contracts written prior to the directive, special rates will be added at the time of renewal. Management restricted the number of reviewers/approvers and trained them to ensure proper rates are selected. Management will explore the feasibility of enhancing the SCR system to default to the special rate when users are submitting extra trip payments.

Target Implementation Date: 07/31/2027

Responsible Official:
Director, Rural Delivery

Recommendation 8:

We recommend the Vice President, Delivery Operations, implement monitoring tools to strengthen oversight of administrative officials and enforce compliance with policies for managing Contract Delivery Service operations.

Management Response/Action Plan:

Management agrees with this recommendation.

Management is working to develop a web-based CDS management support system to house digital forms such as PS Form 5399 and vehicle inspection documents. To monitor route operations and supplier compliance, management has created a web-based format of the PS Form 5500 "Contract Route Irregularity Report".

Target Implementation Date: 07/31/2027

Responsible Official:
Director, Rural Delivery

Recommendation 9:

We recommend the Vice President, Delivery Operations, evaluate opportunities to streamline manual administrative official processes, including through automation, and require them to be completed uniformly across all Contract Delivery Service offices.

Management Response/Action Plan:

Management agrees with this recommendation.

Management is working to develop a web-based CDS management support system to house digital forms such as PS Form 5399 and vehicle inspection documents. To monitor route operations and supplier compliance, management has created a web-based format of the PS Form 5500 "Contract Route Irregularity Report".

Target Implementation Date: 07/31/2027

Responsible Official:

Director, Rural Delivery

Recommendation 10:

We recommend the Vice President, Delivery Operations, update policy to require administrative officials to conduct route surveys annually and when new developments occur, such as changes in the number of delivery points, mail volume, route mileage, or the scheduled time needed to complete the route due to local community growth.

Management Response/Action Plan:

Management agrees with this recommendation.

Current policy language already allows either the AO or supplier/contractor to request a survey at any time. Management will update policy to require, at minimum, annual surveys.

Target Implementation Date: 07/31/2027

Responsible Official:

Director, Rural Delivery

E-SIGNED by JOHN.S MORGAN
on 2026-08-10 08:30:41 EDT

John Morgan
VP, Delivery Operations
cc: Corporate Audit & Response Management

OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE



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