



May 27, 2011

DEBORAH M. GIANNONI-JACKSON
VICE PRESIDENT, EMPLOYEE RESOURCE MANAGEMENT

SUBJECT: Audit Report – Compliance with Occupational Safety and Health
Administration Recordkeeping Requirements
(Report Number HR-AR-11-004)

This report presents the results of our audit of the U.S. Postal Service's compliance with Occupational Safety and Health Administration (OSHA) recordkeeping requirements (Project Number 10YG032HM000). The report responds to a request from Senator Charles E. Grassley and addresses financial and operational risk. Our objective was to determine whether the Postal Service recorded and reported injuries and illnesses in accordance with OSHA requirements. See [Appendix A](#) for additional information about this audit.

The Postal Service must comply with OSHA recordkeeping standards. Postal Service officials are required to accurately and timely prepare and maintain records of work-related injuries and illnesses.¹ Three forms must be completed: the OSHA Form 300 Log of Work-Related Injuries and Illnesses, the annual OSHA Form 300A Summary of Work-Related Injuries and Illnesses, and the OSHA Form 301 Injury and Illness Incident Report. To enforce its standards, OSHA conducts workplace inspections that can result in penalties when violations occur.

Recordkeeping provides a critical part of the Postal Service's safety and health efforts by helping prevent future work-related injuries and illnesses. Using injury and illness data also helps identify and correct hazardous workplace conditions. Additionally, the data is used for focusing inspections and tracking national occupational injury and illness rates. In fiscal year (FY) 2010, recordkeeping accounted for 22 percent² of the proposed OSHA violations resulting in \$63,600 in proposed penalties to the Postal Service.

¹ Recording or reporting a work-related injury, illness, or fatality does not mean the employer or employee was at fault or an OSHA rule has been violated.

² Data is from the Postal Service's OSHA Citation Management Tool.

Conclusion

The Postal Service did not always record and report injuries and illnesses in accordance with OSHA requirements. In addition, if this data is not accurate or complete, it could impact management's ability to identify and correct hazardous conditions, as well as their efforts to mitigate future risks. Incomplete and inaccurate OSHA recordkeeping could result in citations with significant penalties to the Postal Service considering it has more than 30,000 facilities nationwide.

OSHA Recordkeeping Accuracy and Completion

We found potential OSHA recordkeeping violations at 23 of 24 (96 percent) facilities we reviewed. We reviewed a sample of OSHA Forms 300 and 301 from each selected Postal Service facility for calendar years (CYs) 2009 and 2010 and found the forms were not always complete or accurate. Specifically, 43 of 48 (90 percent) OSHA Forms 300 and 12 of 48 (25 percent) OSHA Forms 301 reviewed contained errors or were incomplete, which could lead to potential citations and significant penalties.³

This occurred because:

- The Postal Service does not have adequate procedures for ensuring OSHA recordable⁴ injuries or illnesses are appropriately identified, classified, and recorded by responsible Postal Service officials.⁵
- Postal Service policy⁶ does not provide clear guidance for determining the OSHA recordable dates when they differ from initial injury or illness dates.⁷
- Postal Service officials are required to manually complete OSHA Forms 300, which increases the risk of inaccurate recordkeeping. Currently, the automated OSHA Form 300 within the Employee Health and Safety application has not been activated for local use in all offices; therefore, all facilities must manually complete and maintain the OSHA Form 300.
- Postal Service management did not require officials responsible for preparing OSHA Forms 300 and 301 to take OSHA recordkeeping training.

³ Includes three OSHA Forms 300 and four OSHA Forms 301 that were either not provided in time or could not be located.

⁴ OSHA recordable events are work-related injuries or illnesses resulting in death, days away from work, restricted work, transfer to another job, medical treatment beyond first aid, loss of consciousness, or a significant injury or illness diagnosed by a physician or other licensed health care professional.

⁵ Currently, Human Resource Management (HRM), Safety, and facility officials are responsible for determining and recording OSHA recordkeeping cases.

⁶ Postal Service, *OSHA Recordable Date Policy*, February 4, 2010.

⁷ Initial dates of injury or illness do not always coincide with OSHA's date of injury or onset of illness.

Recordkeeping violations could result in citations and significant penalties. The issues we identified in our audit could result in potential penalties of at least \$55,000.⁸ If OSHA identified similar violations nationwide at the Postal Service's more than 30,000 facilities, the penalties could be significant. Additionally, inaccurate and incomplete recordkeeping could adversely affect injury and illness statistics used by the Postal Service, its employees, and OSHA.

We recommend the vice president, Employee Resource Management:

1. Enhance procedures to ensure Human Resource Management, Safety, and facility officials are appropriately identifying, classifying, recording, and communicating Occupational Safety and Health Administration injuries.
2. Revise the Postal Service Occupational Safety and Health Administration Recordable Date policy to better clarify how to determine Occupational Safety and Health Administration recordable dates when they differ from the initial injury or illness date.
3. Complete the automation capability of the Occupational Safety and Health Administration Form 300, Log of Work-Related Injuries and Illnesses, in the Employee Health and Safety system, and require all facilities to generate the automated form to validate them with the corresponding manual versions.
4. Establish mandatory training for officials responsible for determining Occupational Safety and Health Administration recordable cases and completing related forms.

In addition to the issues we identified, OSHA sent a letter to the Postal Service on January 4, 2011, raising concerns about a systemic failure by the Postal Service to properly maintain logs of work-related illnesses and injuries. OSHA reviewed recordkeeping at 10 facilities and issued 37 citations resulting in 242 alleged violations and \$39,000 in proposed penalties.⁹ Further, OSHA indicated that future recordkeeping violations at any Postal Service facility may be subject to citations classified as willful or repeat.¹⁰ The Postal Service indicated they are reviewing the citations to identify the types of errors and possible root causes.

⁸ We determined 43 OSHA Forms 300 and 12 OSHA Forms 301 could be subject to a \$1,000 fine (see [Appendix C](#)).

⁹ Proposed penalties are fines levied against the Postal Service prior to abatement or settlement.

¹⁰ Application of violation-by-violation procedures is appropriate in situations where the violations in question constitute willful violations. Violation-by-violation procedures increase the penalty's impact of OSHA's limited enforcement resources.

Management's Comments

Management stated they generally agreed with our recommendations. With regard to recommendation 1, management believes the Postal Service has adequate policies and procedures for reporting OSHA injuries and stated they were already taking proactive measures for making improvements in this area to include setting a required core goal for all safety specialists to conduct OSHA recordkeeping reviews. For recommendation 2, management believes the OSHA recordable date policy was adequate. They stated that, prior to implementation of our audit, they were developing an OSHA recordkeeping training which will be strengthened based on the feedback from the U.S. Postal Service Office of Inspector General (OIG). For recommendation 3, management stated they pushed the functionality of generating the OSHA Form 300 through the EHS system to production in April 2011. Further, a national effort is underway for every facility to validate FY 2010 OSHA Forms 300 generated by the EHS system against forms completed manually. Regarding recommendation 4, management stated they are working to deploy a required web-based training course under the FY 2012 national Strategic Training Initiative for facility safety coordinators, safety specialists, and safety managers.

Management stated they were not able to review or confirm the information used by the OIG to determine the accuracy or completion of the sampled OSHA forms. Management acknowledged the OIG found examples of incomplete and possibly inaccurate data that could lead to potential citations. See [Appendix E](#) for management's comments in their entirety.

Evaluation of Management's Comments

Management generally agreed with our recommendations and provided planned corrective action and target implementation dates. The OIG considers management's comments responsive to the recommendations and corrective actions should resolve the issues identified in the report. Specifically, we find that their proposed action to increase recordkeeping reviews, develop and strengthen mandatory training, and automate OSHA 300 Forms meet the intent of our recommendations.

With regard to recommendation 1, we agree that additional recordkeeping reviews should help identify Occupational Safety and Health Administration issues; however, we believe management could enhance their procedures to ensure resolve issues identified in the reviews. To close this recommendation, we would like management to provide the results of the recordkeeping reviews and any additional corrective action and enhancements to resolve the issues identified.

Regarding management's review of the OSHA forms, during the audit we provided a list of the sampled facilities we reviewed and the types of errors identified for each OSHA Form 300. We also met with management to discuss and review a sample of the OSHA Forms 300 with discrepancies. After receiving management's comments, we met with

management again on May 12, 2011, and provided a copy of all the OSHA Forms 300 with discrepancies. Management indicated agreement with the discrepancies we identified.

The OIG considers all of the recommendations significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These 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 courtesies provided by your staff. If you have any questions or need additional information, please contact Andrea Deadwyler, director, Human Resources and Security, or me at 703-248-2100.



Mark W. Duda
Deputy Assistant Inspector General
for Support Operations

Attachments

cc: Anthony J. Vegliante
Sylvester Black
Stephan J. Boardman
Sean M. Lacey
Corporate Audit and Response Management

APPENDIX A: ADDITIONAL INFORMATION

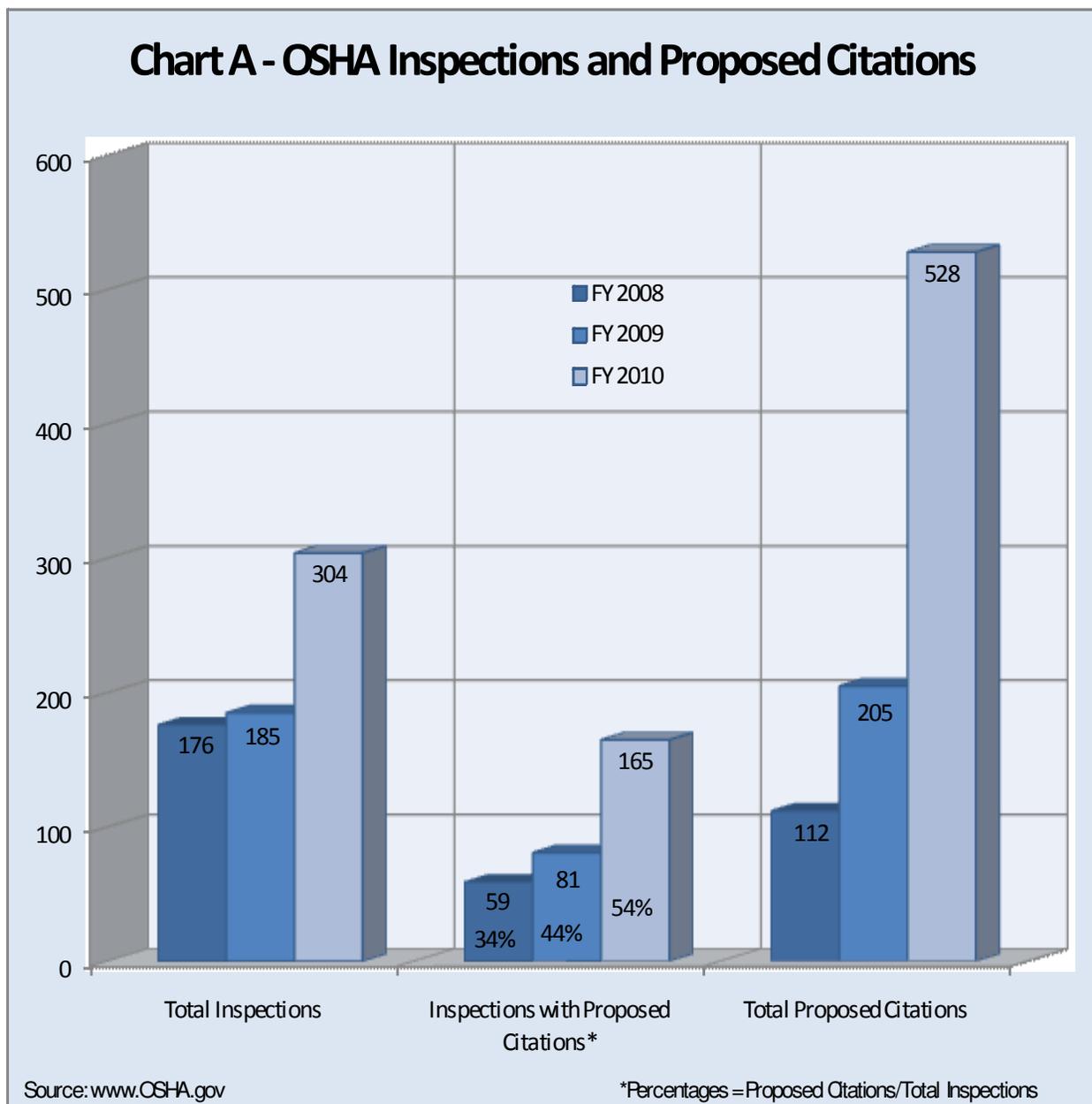
BACKGROUND

The Occupational Safety and Health (OSH) Act of 1970, administered by OSHA, established a nationwide federal program to protect workers from job-related death, injury, and illness. Under the OSH Act, employers are responsible for providing safe and healthy workplaces for their employees. OSHA's role is to ensure these conditions by setting and enforcing standards; and providing training, education, and assistance. Covered employers comply with the safety and health standards and have a general duty to provide their employees with a workplace free from recognized serious hazards. OSHA provides enforcement through workplace inspections. See [Appendix D](#) for a map depicting OSHA citations for FY 2010.

In 1998, the Postal Employees Safety Enhancement Act (PESEA) changed the status of the Postal Service to an employer that is fully subjected to the OSH Act. Previously, the Postal Service, as a quasi-federal agency, was exempt from private sector provisions of the OSH Act.¹¹ If violations occur, the Postal Service may be cited, penalized, and, in extreme cases, referred for criminal prosecution by OSHA.¹² In recent years, the Postal Service has seen an increase in inspections, citations, and proposed penalties. Although there has been a significant increase, the majority of the citations and proposed penalties relate to electrical violations. See [Chart A](#) for OSHA statistics for the last 3 fiscal years.

¹¹ Federal agencies are covered under Section 19 of the OSH Act and Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*, February 26, 1980.

¹² Citations inform an employer of regulations and standards alleged to have been violated. Fines for willful or repeated violations can range from \$5,000 to \$70,000 for each violation, and each serious violation may result in a penalty up to \$7,000.



The Postal Service must comply with OSHA’s recordkeeping standards. OSHA provides enforcement through workplace inspections. Over the last 3 fiscal years, OSHA’s inspections and citations to the Postal Service have increased considerably and recordkeeping violations are among the issues identified. Recordkeeping citations and penalties in FYs 2008 through 2010 were among the top three proposed OSHA safety violations in the Postal Service. See [Table A](#) for OSHA enforcement statistics for the Postal Service for FYs 2008 through 2010.

Table A - OSHA Enforcement Statistics¹³								
	Total Inspections	Inspections with Proposed Citations	Proposed Penalties	Proposed Violations¹⁴				
				Other	Repeat	Serious	Willful	Total
FY 2008	176	59	119,360	51	2	59	0	112
FY 2009	185	81	537,011	81	16	108	0	205
FY 2010	304	165	6,615,708 ¹⁵	143	33	272	80	528
Total	665	305	\$7,272,079	275	51	439	80	845

OSHA provides specific recording and reporting requirements that comprise the framework for the nationwide OSH recording system. Under this system, it is essential that data recorded by employers be uniform and accurate to ensure the consistency and validity of the statistical data that is used by OSHA for many purposes, including inspection targeting, performance measurement, standards development, and resource allocation. The data also aids employers and compliance officers in analyzing the safety and health environment at the employer’s establishment.

In December 2009, the Postal Service began implementing the EHS system for reporting accidents and injuries. The EHS system is designed to streamline the reporting and management of accidents, injuries, and claims for facility supervisors and Safety and HRM personnel. OSHA recordable accidents are also determined within the system based on the information entered.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our objective was to determine whether the Postal Service recorded and reported injuries and illnesses in accordance with OSHA requirements.

The scope of this audit included fieldwork at Postal Service Headquarters and facilities nationwide to determine whether the Postal Service is recording injury and illness data in accordance with OSHA requirements. To accomplish the objective, we:

- Interviewed Postal Service officials responsible for recording and reporting injury and illness data.

¹³ The Postal Service may contest the citation, proposed penalty, and/or abatement date. These numbers do not reflect those contested items that have resulted in reductions in the violation’s severity, number, or penalty amount.
¹⁴ Serious violations are those where a substantial probability that death or serious physical harm could result. Willful violations are those in which an employer intentionally allows a violation to continue to exist. Other violations are for hazardous conditions that cannot reasonably be predicted to cause death or serious physical harm to exposed employees but do have a direct and immediate relationship to their safety and health.
¹⁵ Proposed fines associated with recordkeeping were \$63,600. \$5.8 million in proposed fines were related to electrical violations. Postal Service officials stated they were reviewing and addressing the proposed electrical citations and have developed an electrical work plan to mitigate risks.

- Conducted site visits in the Western Area and at facilities in the Hawkeye and Colorado/Wyoming Districts.
- Sampled three facilities from each of the eight Postal Service areas for review.
- Obtained OSHA Forms 300 and 301 from 24 sampled facilities for CYs 2009 and 2010.
- Analyzed OSHA recordkeeping forms using accident reporting data, Office of Workers' Compensation Programs (OWCP) claims,¹⁶ and other supporting documents to determine whether injury and illness information was appropriately recorded.
- Reviewed OSHA injury and illness statistics and trends for FYs 2008 through 2010.

We conducted this performance audit from June 2010 through May 2011 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 officials on March 22, 2011, and included their comments where appropriate.

We assessed the reliability of injury and illness data by interviewing Postal Service officials knowledgeable about the data; reviewing existing information about the data and the system that produced it; obtaining system demonstrations; and comparing the data with hard-copy OSHA and OWCP documentation. We determined that the data was sufficiently reliable for the purposes of this report.

¹⁶ We reviewed select CA-2 Forms, *Notice of Occupational Disease and Claim for Compensation*.

PRIOR AUDIT COVERAGE

Report Title	Report Number	Final Report Date	Report Results
<i>Powered Industrial Vehicle Management Systems at the Washington Network Distribution Center</i>	NO-AR-09-010	9/22/2009	Internal controls over vehicle safety, security, and inventory were not in place, because management did not implement compensating internal controls when the Powered Industrial Vehicle Management Systems was no longer functioning. For example, equipment operators did not complete OSHA safety checklists as required, resulting in management not identifying unsafe vehicles. We recommended and management agreed to provide closer supervision and improve internal controls over powered industrial vehicles.
<i>Workplace Safety and Injury Reduction Goals in Selected Capital Metro Area Facilities</i>	HM-AR-09-001	2/27/2009	The Postal Service provides safety and health programs to ensure compliance with OSHA standards. We made recommendations regarding overstated injury reduction goals and the correction of safety deficiencies. Management agreed to all 10 recommendations, but they disagreed with several of the findings in the report, as well as the monetary impact of \$63,000.
<i>Postal Service's Workplace Safety and Workplace-Related Injury Reduction Goals and Progress</i>	HM-AR-07-002	5/16/2007	The Postal Service established and exceeded its OSHA illness and injury (II) reduction goals for FYs 2005 and 2006, and there may have been a corresponding reduction in the Postal Service's total accident and OSHA II costs. However, the Postal Service did not capture individual accident costs and, therefore, we could not determine the cost savings in key categories from 1 year to the next. We recommended and management agreed to closely monitor conversion to the Systems Applications and Processes Environmental Health and Safety module and, as soon as possible, ensure the upgraded system captures key costs by facility, district/performance cluster, and area.

APPENDIX B: DETAILED ANALYSIS

In FY 2010, OSHA issued recordkeeping citations to the Hawkeye District that resulted in proposed penalties of \$20,000. Postal Service officials indicated the recordkeeping review conducted by OSHA in the Hawkeye District encompassed 168 facilities including 1,758 entries¹⁷ from OSHA Forms 300 and 234 data elements from OSHA Forms 301. The penalty was reduced to \$14,000, and the Postal Service reached a settlement where it agreed in part to correct the violations, add OSHA Form 300 reviews in the Hawkeye District, and provide recordkeeping training to district safety managers in the Western Area.

In response to these citations and an employee complaint, Senator Grassley requested the OIG determine whether the inaccurate injury and illness reports were representative of a more systemic problem. Consequently, we conducted site visits at facilities in the Hawkeye and Colorado/Wyoming Districts and in the Western Area. We also obtained and reviewed samples of OSHA records from facilities in each Postal Service area for CYs 2009 and 2010.

OSHA Recordkeeping Accuracy and Completion

We found the Postal Service did not always record and report injuries and illnesses in accordance with OSHA requirements. Further, we concluded the recordkeeping issues we identified were a problem nationwide and could adversely affect workplace safety. In addition, these issues could result in future OSHA citations with penalties.

Specifically, we found potential OSHA recordkeeping violations at 23 of 24 (96 percent) facilities we reviewed. Forty-three of 48 (90 percent) OSHA Form 300 logs and 12 of 48 (25 percent) OSHA Forms 301 reviewed contained errors or were not complete.

- OSHA Forms 300.
 - Four were not provided or were not timely.¹⁸
 - Thirty-three did not have sufficient injury/illness detail.¹⁹
 - Eighteen did not have the most serious outcome checked.²⁰

¹⁷ Each OSHA Form 300 case requires the completion of up to 10 data elements. The Postal Service indicated there were 17,814 data elements included in the review.

¹⁸ OSHA requires copies of the records to be provide within 4 business hours.

¹⁹ OSHA requires a description of the injury or illness, parts of body affected and object/substance that directly injured or made the person ill.

²⁰ OSHA requires each case to be classified by death, days away from work, job transfer or restriction, or other recordable case.

- Eighteen did not contain the appropriate number of days the employee was away from work or had a job transfer/restriction.²¹
- Eighteen had calculation errors.
- Fourteen did not complete sections for identifying the person or location of the event or for identifying the injury or illness type.
- OSHA Forms 301.
 - Four were not provided or were not timely.
 - Five did not contain the required injury or illness detail.
 - Eight were not completed within 7 days of recordability.
 - Nine contained inaccurate designation as non-recordable.

Recordkeeping Procedures

The Postal Service does not have adequate procedures to ensure OSHA recordable cases are properly identified, classified, and updated by responsible Postal Service officials. Although the EHS system automatically classifies accidents as OSHA recordable based on accident and medical information entered, there are exceptions for medical treatment cases. For those cases, Postal Service personnel must make an OSHA recordable determination to manually update the EHS system. HRM completes forms to help identify OSHA medical treatment cases, but the process could be enhanced to ensure cases are timely and consistently reviewed for OSHA recordability and for ensuring those determinations are communicated to officials responsible for updating the EHS system and manual forms.

Recordkeeping Policy

Postal Service policy does not provide clear guidance for determining the OSHA recordable dates when they differ from initial injury or illness dates.²² A case is generally recorded on the date of injury or illness with exceptions. Those exceptions include cases where the employee cannot recall the specific date and where there are a series of contributing or aggravating workplace events or exposures over time until the case meets the recording criteria.²³ Many of the OWCP claims we reviewed were not

²¹ Job transfers occur when employees are transferred to another job while they are injured. Job restrictions occur when employees are unable to perform certain duties while they are injured.

²² OSHA recordable date is based on OSHA's criteria and can be different from the initial accident date associated with an OWCP claim.

²³ Use the date the illness or injury met OSHA recordable criteria when there was an intervening event or exposure that occurred in the work environment that was a contributing or aggravating factor after the initial date of injury or onset of illness.

appropriately recorded when OSHA recordability criteria was met. For those claims, the date the employee first became aware of the disease or illness may not be the correct date for recording an OSHA illness or injury. The current Postal Service OSHA recordable date policy does not clearly distinguish those occasions when the OSHA recordable date will be different from the initial date of injury or onset of illness.

Manual OSHA 300 Forms

Postal Service officials at each facility must manually complete and maintain the OSHA Form 300, because the Postal Service has not automated the form within the EHS system for use in all offices.²⁴ Manual completion of the OSHA Form 300 requires OSHA recordable classifications to flow through HRM, Safety, and individual facilities, which increase the risk of errors. Automating the OSHA Form 300 should help increase efficiency and consistency and prevent clerical errors. Postal Service officials stated they have implemented the initial components necessary to produce automated OSHA Forms 300 and plan to have them for recordkeeping for CY 2011.

Training

Officials responsible for OSHA recordkeeping did not receive sufficient training for recording OSHA injuries and illnesses. We reviewed training records for officials responsible for OSHA recordkeeping and determined that 50 of 62 (81 percent) employees did not receive OSHA recordkeeping training.

OSHA recordkeeping criteria cover a broad range of illness and injury scenarios; therefore, it is important for officials to understand their responsibilities and the requirements in order to prevent errors.

Recordkeeping violations could result in citations and significant penalties to the Postal Service. In addition, these violations could adversely affect injury and illness statistics used by the Postal Service, its employees, and OSHA. The issues we identified could result in potential penalties of at least \$55,000 for the 24 facilities we reviewed. Additionally, in a letter to the Postal Service dated January 4, 2011, OSHA raised concerns about a systemic failure by the Postal Service to properly maintain logs of work-related illness and injuries. OSHA reviewed recordkeeping at 10 facilities and issued 37 citations resulting in 242 alleged violations and \$39,000 in initial penalties. OSHA indicated that future recordkeeping violations at any Postal Service facility²⁵ may be subject to citations classified as willful or repeat. As a result of our audit, the Postal Service indicated training materials and job aids would be reviewed and updated to assist the field in recordkeeping.

²⁴ Management stated they have not implemented the automated OSHA Form 300 because of technical difficulties in matching finance numbers to individual facilities.

²⁵ The Postal Service owns or leases more than 30,000 facilities.

APPENDIX C: OTHER IMPACT

Finding	Impact Category	Amount
OSHA Recordkeeping	Assets at Risk ²⁶	\$55,000

²⁶ Assets that are at risk of loss because of inadequate internal controls

**APPENDIX D: FY 2010 OSHA PROPOSED CITATIONS AND PENALTIES
TO THE U.S. POSTAL SERVICE**

\$0 - \$50,000

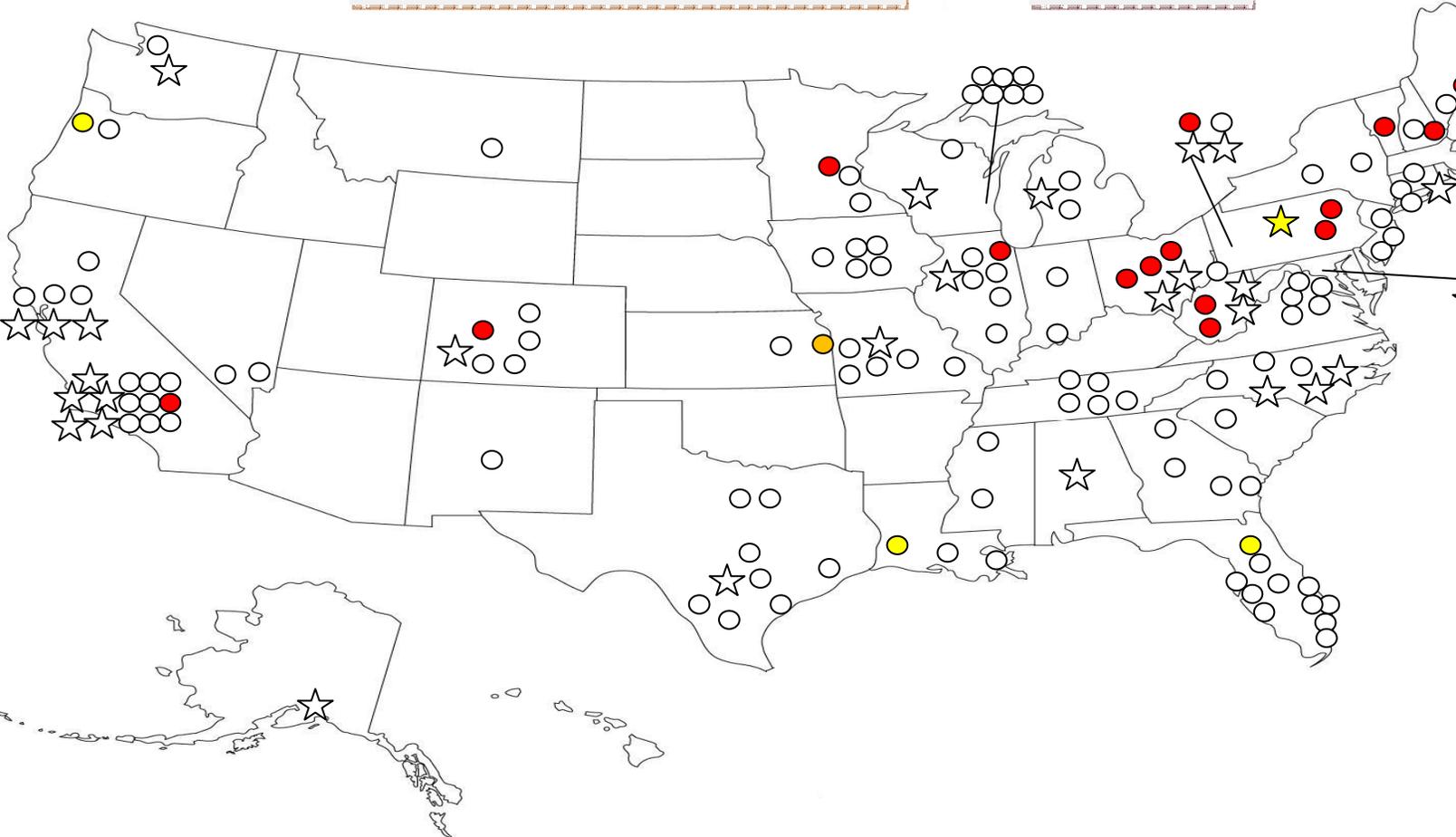
\$50,001 - \$125,000

\$125,001 - \$200,000

Over \$200,000

Contains Recordkeeping - ☆

Other - ○



APPENDIX E: MANAGEMENT'S COMMENTS

DEBORAH GIANNONI-JACKSON
VICE PRESIDENT
EMPLOYEE RESOURCE MANAGEMENT



May 5, 2011

LUCINE WILLIS
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Compliance with Occupational Safety and Health Administration
Recordkeeping Requirements (Report Number [xx-xx-xx-DRAFT])

Management generally agrees with the recommendations in the report, however, was not able to review the sample of Occupational Safety and Health Administration (OSHA) Forms 300 and 301 that were analyzed by the Office of the Inspector General (OIG). Management was not able to confirm the information that was relied upon to rule data elements as "incomplete," "accurate," or "inaccurate." Management acknowledges that the OIG found examples of incomplete and possibly inaccurate data that could lead to potential citations.

Recommendation 1:

Enhance procedures to ensure Human Resource Management, Safety, and facility officials are appropriately identifying, classifying, recording, and communicating Occupational Safety and Health Administration injuries.

Management Response/Action Plan:

Management believes that USPS has adequate policies, procedures, reference materials, and programs to assist the field in accurately reporting OSHA injuries, and that they were already taking proactive measures to improve in this area. For the FY 2011 Pay for Performance process, the USPS set a required core goal for all Safety Specialists to conduct OSHA recordkeeping reviews. Management will monitor the effectiveness of this requirement in Quarters 3 and 4, and consider retaining this requirement in the future.

Target Implementation Date:

Quarter 4 FY 2011

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Responsible Official:

Robert J. Brant, Manager, Safety and OSHA Compliance Programs

Recommendation 2:

Revise the Postal Service OSHA Recordable Date policy letter to better clarify how to determine Occupational Safety and Health Administration recordable dates when they differ from the initial injury or illness date.

Management Response/Action Plan:

Management believes that USPS issued an adequate policy in February 2010 in response to the Hawkeye citation. However, the OIG audit noted that it is not consistently understood and applied at all facilities.

Prior to the initiation of this audit, Management was developing a web based training program on OSHA recordkeeping. Based on the feedback from the OIG the content of the training will be strengthened to include material for the field Health and Resource Management (HRM) processes and give examples of how to handle differences between recordable and initial injury or illness dates.

Target Implementation Date:

Quarter 4 FY 2011

Responsible Official:

Robert Brant, Manager, Safety and OSHA Compliance Programs

Recommendation 3:

Complete the automation capability of the OSHA Form 300, Log of Work-Related Injuries and Illnesses, in the Employee Health and Safety (EHS) system, and require all facilities to generate the automated form to validate them with the corresponding manual versions.

Management Response/Action Plan:

Management agrees with the recommendation. The functionality of generating the OSHA 300 log through EHS was pushed to production the weekend of April 9. Headquarters Safety is conducting a national effort to have every facility generate an EHS OSHA 300 log for fiscal year (FY) 2010, and conduct a validation between the automated and the manual form. A process will be outlined for the field to determine between user error and application error, and feedback will be collected nationally to finalize the ability to go forward with the automated forms.

Target Implementation Date:

Quarter 4 FY 2011

Responsible Official:

Robert Brant, Manager Safety Programs and OSHA Compliance

Recommendation 4:

Establish mandatory training for officials responsible for determining OSHA recordable cases and completing related forms.

Management Response/Action Plan:

Management generally agrees with the recommendation. As mentioned in the response to recommendation 2 above, Management is working to deploy a web based training course on OSHA recordkeeping in Quarter 4 FY 2011. The OSHA Recordkeeping course will be required in FY 2012 under the national Strategic Training Initiative for all Facility Safety Coordinators, Safety Specialists, and Safety Managers.

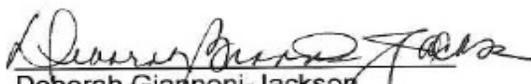
Target Implementation Date:

Quarter 1 FY 2012

Responsible Official:

Robert Brant, Manager, Safety and OSHA Compliance Programs

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


Deborah Giannoni-Jackson
Vice President, Employee Resource Management