



# OFFICE OF INSPECTOR GENERAL

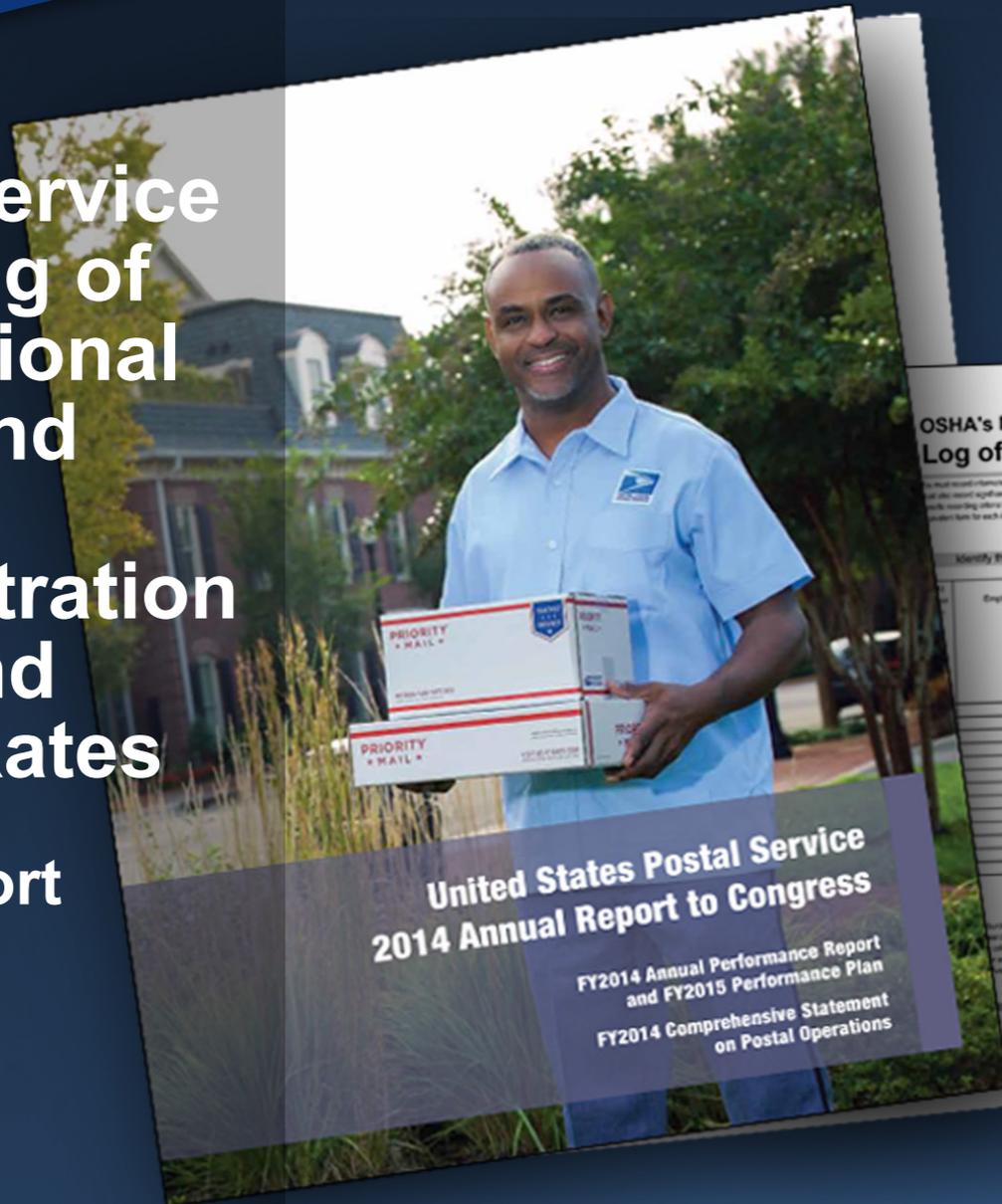
## UNITED STATES POSTAL SERVICE

# Postal Service Reporting of Occupational Safety and Health Administration Injury and Illness Rates

## Audit Report

Report Number  
HR-AR-16-003

April 29, 2016



United States Postal Service  
2014 Annual Report to Congress

FY2014 Annual Performance Report  
and FY2015 Performance Plan  
FY2014 Comprehensive Statement  
on Postal Operations

OSHA's Form 300 (Rev. 01/2004)  
**Log of Work-Related Injuries and Illnesses**

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year \_\_\_\_\_  
U.S. Department of Labor  
Occupational Safety and Health Administration  
Form approved OSHA no. 1218-0178

Establishment Name \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_

Identify the person		Describe the case			Classify the case					Enter the number of days the injured or ill worker was out of work					Check the "Injury" column or check one type of illness					
(1) Employee's Name	(2) Job Title (e.g., Worker)	(3) Date of injury or onset of illness (m/d/yyyy)	(4) Where the event occurred (e.g., Loading dock north end)	(5) Describe injury or illness, parts of body affected, and approximate date that injury occurred or onset of illness (e.g., Second degree burn on right forearm from scald/steaming liquid)	CHECK ONLY ONE box for each case based on the most serious outcome for that case															
					Death	Days away from work	Job transfer or restriction	Other recordable cases	Days From Work (Days)	Days transfer or restriction (Days)	Days lost (Days)	Days lost (Days)	Days lost (Days)	Days lost (Days)	Days lost (Days)	Days lost (Days)	Days lost (Days)	Days lost (Days)	Days lost (Days)	Days lost (Days)
Page Totals																				

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# OFFICE OF INSPECTOR GENERAL

## UNITED STATES POSTAL SERVICE

## Highlights

***The Postal Service's  
OSHA I&I incident rate is  
one of several performance  
indicators in its NPA.***

### Background

The Occupational Safety and Health Administration (OSHA) requires covered employers, including the U.S. Postal Service, to record information about every work-related injury or illness that involves medical treatment beyond first aid, days away from work, or death. OSHA also provides an OSHA injury and illness (I&I) rate that employers use to determine problem areas and progress in preventing work-related injuries, illnesses, and deaths. Employers calculate the OSHA I&I rate as the number of recordable injuries and illnesses occurring among a given number of full-time employees over a given period of time.

The Postal Service's OSHA I&I incident rate is one of several performance indicators in its National Performance Assessment (NPA), the national report card that measures progress toward achieving performance goals.

The Postal Service Safety and OSHA Compliance Program, the rate indicator sponsor, is responsible for calculating and validating the OSHA I&I rate. The target rate is established each fiscal year and a snapshot of the actual rate is taken at the end of the fiscal year to determine if the performance goal was met.

The Strategic Business Planning group is responsible for compiling and publishing several operational and performance statistics in the Postal Service's annual report to Congress, which includes the OSHA I&I target and actual rates.

This report responds to a request from Senator Charles Grassley of Iowa to review the Postal Service's reporting of OSHA I&I rates and whether it had an impact on employees' performance bonuses for fiscal years (FY) 2010 and 2012. Our objectives were to evaluate the accuracy of OSHA I&I rates reported to Congress and the impact of any errors on salary increases and lump sum payments. We also evaluated the Postal Service's actions on recommendations from our previous audit report on OSHA recordkeeping.

### What The OIG Found

The Postal Service published incorrect OSHA I&I target and actual rates in its annual report to Congress. Specifically, the reports for FYs 2010 through 2014 included incorrect target rates and the reports for FYs 2013 and 2014 included incorrect actual rates. The Strategic Business Planning personnel relied on statistics previously published in the reports to Congress and not the finalized NPA rates. Publishing incorrect rates in the reports gave the appearance that the Postal Service awarded salary increases and lump sum payments based on the revised rates. The Postal Service did not award salary increases and lump sum payments for FYs 2011, 2012, and 2013 due to financial difficulties. The Postal Service did award salary increases and lump sum payments in FY 2010 and 2014, based on numerous NPA goals, which included actual OSHA I&I rates and not the statistics published in the reports to Congress. We validated the accuracy of the NPA data and determined the data were sufficiently accurate.



# OFFICE OF INSPECTOR GENERAL

## UNITED STATES POSTAL SERVICE

***We found that 136 of a sample of 153 employees (89 percent) did not complete the online courses.***

Although, the Postal Service's I&I rates were used as one of various factors to address performance, the indicators that were used were accurate and not the same erroneous rates used in the reports to Congress. Thus, these erroneous rates did not impact salary increases and lump sum payments.

The incorrect statistics published in the reports to Congress occurred because the Postal Service did not have written processes to ensure accurate data collection, validation, and reporting. Specifically, Strategic Business Planning officials and Safety and OSHA Compliance officials did not verify the accuracy of the rates before the reports were published. Publishing incorrect rates in reports to Congress could impact the Postal Service's goodwill and public credibility.

Finally, although officials established online training for personnel responsible for determining OSHA recordable cases and completing related forms to implement our previous audit

recommendation, they did not make the training mandatory to ensure appropriate personnel completed the training. We found that 136 of a sample of 153 employees (89 percent) did not complete the online courses. Insufficient training could prevent personnel from effectively performing their OSHA recordkeeping responsibilities and result in citations and significant penalties to the Postal Service.

### **What The OIG Recommended**

We recommended management establish a process to ensure the accuracy of OSHA I&I statistics reported in public documents. We also recommended management require that personnel with OSHA recordkeeping responsibilities complete the online training.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

April 29, 2016

**MEMORANDUM FOR:** NANCY RETTINHOUSE  
VICE PRESIDENT, EMPLOYEE RESOURCE MANAGEMENT

EMIL DZURAY  
DIRECTOR, STRATEGIC PLANNING

E-Signed by Janet Sorensen   
VERIFY authenticity with e-Sign  


**FROM:** Janet M. Sorensen  
Deputy Assistant Inspector General  
for Revenue, Delivery, and Marketing

**SUBJECT:** Audit Report – Postal Service Reporting of Occupational  
Safety and Health Administration Injury and Illness Rates  
(Report Number HR-AR-16-003)

This report presents the results of our audit of Postal Service Reporting of Occupational Safety and Health Administration Injury and Illness Rates (Project Number 15RG023HR000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Monique P. Colter, director, Human Resources and Support, or me at 703-248-2100.

Attachment

cc: Corporate Audit and Response Management

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# Findings

***The OSHA I&I rate can determine problem areas and progress in preventing work-related injuries, illnesses, and deaths.***

***The Postal Service published incorrect OSHA I&I target and actual rates in its annual reports to Congress.***

## Introduction

This report presents the results of our audit of the U.S. Postal Service reporting of Occupational Safety and Health Administration (OSHA) injury and illness (I&I) rates (Project Number 15RG023HR000). This report responds to a request from Senator Charles Grassley of Iowa to review the Postal Service's reporting of these rates and related performance bonuses for fiscal years (FY) 2010 and 2012. Our objectives were to evaluate the accuracy of OSHA I&I rates reported to Congress and the impact of any errors on salary increases and lump sum payments. We also evaluated the Postal Service's actions on recommendations from a previous audit report on OSHA recordkeeping.<sup>1</sup> See [Appendix A](#) for additional information about this audit.

OSHA<sup>2</sup> requires covered<sup>3</sup> employers to record information about every work-related I&I that involves medical treatment beyond first aid, days away from work, or death. Employers calculate the OSHA I&I rate as the number of recordable<sup>4</sup> injuries and illnesses occurring among a given number of full-time employees over a given period of time. The OSHA I&I rate can determine problem areas and progress in preventing work-related injuries, illnesses, and deaths. OSHA provides the following formula to calculate the rate:

$$\frac{\text{Total Number of Injuries and Illnesses X 200,000}}{\text{Number of Hours Worked by All Employees}}$$

The Postal Service's OSHA I&I incident rate is one of several performance indicators in its National Performance Assessment (NPA), the national report card that measures progress toward achieving performance goals. The Postal Service Safety and OSHA Compliance Program, the rate indicator sponsor, is responsible for calculating and validating the OSHA I&I rate.<sup>5</sup> The target rate is established each fiscal year and a snapshot of the actual rate is taken at the end of the fiscal year to determine if the performance goal was met.<sup>6</sup>

The Strategic Business Planning group at headquarters compiles and publishes several operational and performance statistics in the Postal Service's annual report to Congress,<sup>7</sup> including OSHA's I&I target and actual rates.

## Summary

The Postal Service published incorrect OSHA I&I target and actual rates in its annual reports to Congress. Specifically, the reports for FYs 2010 through 2014 included incorrect target rates and the reports for FYs 2013 and 2014 included incorrect actual rates. The Strategic Business Planning personnel relied on statistics previously published in the reports to Congress and not the finalized NPA rates. The publishing of incorrect rates in the reports to Congress gave the appearance that the Postal Service awarded salary increases and lump sum payments on the revised rates.

<sup>1</sup> *Compliance with Occupational Safety and Health Administration Recordkeeping Requirements* (Report Number HR-AR-11-004, dated, May 27, 2011).

<sup>2</sup> In 1998, the Postal Employees Safety Enhancement Act (PESEA) required the Postal Service to comply fully with the OSH Act.

<sup>3</sup> Covered employers represent all employers covered by Title 29, Subtitle B, Chapter XVII, Part 1904.

<sup>4</sup> A recordable injury involves death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness. It also includes significant I&I diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

<sup>5</sup> The OSHA I&I target rate is established at the beginning of each fiscal year and approved by the Postal Service's Executive Leadership Team and Board of Governors.

<sup>6</sup> The annual snapshot of the OSHA I&I actual rate is taken in October, following the end of each fiscal year. A snapshot is used because the actual OSHA I&I rate changes often due to the employee's right to report a work-related injury within 3 years.

<sup>7</sup> Title 39, Section 2402, *Annual Report*.

***In the reports to Congress for FYs 2010 through 2014, the Postal Service published incorrect OSHA I&I target rates, which were inconsistent with rates reported by NPA.***

The Postal Service did not award salary increases and lump sum payments for FYs 2011, 2012, and 2013 due to financial difficulties. The Postal Service did award salary increases and lump sum payments in FY 2010 and 2014 that were based on numerous NPA goals, which included OSHA I&I rates and not statistics published in the reports to Congress. We validated the accuracy of the NPA data and determined the data was sufficiently accurate.

Although, the Postal Service I&I rates were used as one of various factors to address performance, the indicators that were used were accurate and were not the same erroneous rates used in the reports to Congress. Thus, these erroneous rates in the reports to Congress did not impact these salary increases and lump sum payments.

The incorrect statistics published in the reports to Congress occurred because the Postal Service did not have written processes to ensure accurate data collection, validation, and reporting. Specifically, Strategic Business Planning officials and the Safety and OSHA Compliance officials did not verify the accuracy of the rates before the reports were published. The publishing of incorrect rates in the reports to Congress could impact the Postal Service's goodwill and public credibility.

Finally, although officials established online training for personnel responsible for determining OSHA recordable cases and completing related forms to implement our previous audit recommendation, they did not make the training mandatory to ensure appropriate personnel completed the training. We found that 136 of a sample of 153 employees (89 percent) did not complete the online courses. Insufficient training could prevent personnel from effectively performing their OSHA recordkeeping responsibilities and result in citations and significant penalties to the Postal Service.

## **Reporting Occupational Safety and Health Administration Injury and Illness Target and Actual Rates**

The Postal Service published incorrect OSHA I&I target rates in its FY 2010 through 2014 annual reports to Congress and incorrect actual rates in its FY 2013 and 2014 reports. The incorrect statistics published in the reports to Congress occurred because the Postal Service did not have written processes to ensure accurate data collection, validation, and reporting. Specifically, Strategic Business Planning officials, who are required to report OSHA I&I target and actual rates in the reports to Congress, and the Safety and OSHA Compliance officials, who are responsible for OSHA I&I rate, did not verify the accuracy of the rates before the reports were published.

The incorrect rates published in the reports to Congress gave the appearance that salary increases and lump sum payments were given based on revised OSHA I&I target and actual rates. The publishing of incorrect rates in the reports could impact the Postal Service's goodwill and public credibility.

### **Target Rates**

In the reports to Congress for FYs 2010 through 2014, the Postal Service published incorrect OSHA I&I target rates, which were inconsistent with rates reported by NPA, as depicted in [Table 1](#). In the following fiscal years, incorrect target rates were published as follows:

- The FY 2010 report published the target rate for FY 2010 as 5.52; however, NPA FY 2010 target rate was 5.23.
- The FY 2011 report published the target rate for FY 2012 as 5.57; however, NPA FY 2012 target rate was 5.72.

**The report for FYs 2013 and 2014 contained OSHA I&I actual rates for FY 2010 through FY 2014 that were incorrect and inconsistent with actual rates reported by NPA**

- The FY 2012 report published the target rate for FY 2013 as 5.44; however, NPA FY 2013 target rate was 5.20.
- The FY 2013 report published the target rates for FYs 2013 and 2014 as 5.72 and 5.55, respectively; however NPA target rates were 5.20 and 5.10, respectively.
- The FY 2014 report published the target rates for FYs 2012, 2013, and 2014 as 5.57, 5.72, and 5.55, respectively; however, the NPA target rates were 5.72, 5.20, and 5.10, respectively.

**Table 1. NPA and Report to Congress OSHA I&I Target Rates For FY 2010 Through FY 2014**

		Target Rate Provided by NPA								
		FY2010 Target	FY2011 Target	FY2012 Target	FY2013 Target	FY2014 Target				
Target Rate Published in Report to Congress During Fiscal Year	Single Piece First Class Mail									
	Overnight	N/A	95.55	96.50	96.50	96.54	96.70	96.48	96.85	
	Next Day	94.50	93.25	94.50	94.50	94.50	95.25	95.10	94.94	94.15
	Three to Five Day	95.25	79.50	95.25	87.75	95.25	91.80	95.00	92.25	92.85
	Priority First Class Mail									
	Overnight	96.80	95.74	96.80	97.00	96.80	97.20	96.70	96.80	N/A
	Next Day	95.50	93.50	95.50	96.40	95.50	97.00	95.10	95.70	N/A
	Three to Five Day	95.25	87.75	95.25	87.25	95.25	95.50	95.00	95.10	N/A
	Customer Impact	95.70	95.70	95.70	Baseline	Baseline	N/A	N/A	N/A	N/A
	Business Services Network (BSN)	N/A	94.50	N/A	Baseline	Baseline	N/A	N/A	N/A	N/A
Point of Sale (POS)	N/A	95.25	N/A	Baseline	Baseline	N/A	N/A	N/A	N/A	
Delivery	N/A	77.40	N/A	Baseline	Baseline	N/A	N/A	N/A	N/A	
Customer Care Center	N/A	71.70	N/A	Baseline	Baseline	N/A	N/A	N/A	N/A	
OSHA Injuries and Illness (I&I)	5.20	5.49	5.39	6.03	5.57	5.78	5.72	5.61	5.55	
Value of the Employee Survey (%)	N/A	N/A	65.10	65.01	65.10	64.70	64.95	64.70	64.90	
Deliveries per Hour (calculated rate)	42.00	41.50	42.40	42.00	42.90	41.80	42.70	41.00	42.20	
Net Contributable Income (Loss)	0.10	1.19	1.10	1.35	1.10	(1.00)	(2.00)	(2.40)	(3.00)	

Source: NPA.

**Actual Rates**

In FYs 2010, 2011, and 2012, the Postal Service published correct OSHA I&I actual rates in the reports to Congress. However, the report for FYs 2013 and 2014 contained OSHA I&I actual rates for FY 2010 through FY 2014 that were incorrect and inconsistent with actual rates reported by NPA, as depicted in Table 2. In the following fiscal years, incorrect actual rates were published as follows:

- The 2013 report published the actual rates for FYs 2010, 2011, 2012, and 2013 as 5.76, 6.03, 5.78, and 5.61, respectively; however, NPA actual rates were 5.49, 5.67, 5.44, and 5.63, respectively.
- The 2014 report published the actual rates for FYs 2011, 2012, 2013, and 2014 as 6.03, 5.78, 5.61, and 6.32, respectively; however, NPA actual rates were 5.67, 5.44, 5.63, and 6.34, respectively.

**The Postal Service did not meet its OSHA I&I national performance goal for FY 2010 and FY 2014.**

**Table 2. NPA and Report to Congress OSHA I&I Actual Rates for FY 2010 Through FY 2014**

		Target Rate Provided by NPA								
		FY2010 Actual	FY2011 Actual	FY2012 Actual	FY2013 Actual	FY2014 Actual				
Actual Rate Published in Report to Congress During Fiscal Year	Single Class First Class Mail									
	Overage <sup>1</sup>	NA	95.55	95.80	95.80	95.14	95.70	95.48	95.85	
	Service	95.50	93.28	95.50	94.90	95.50	95.28	95.10	94.94	94.15
	Time to Post Office	95.25	93.14	95.25	97.71	95.25	97.81	95.10	97.21	97.11
	Prepaid First Class Mail									
	Overage <sup>1</sup>	96.80	95.74	96.80	97.00	96.80	97.20	96.70	96.80	NA
	Service	96.10	93.14	96.10	96.40	96.10	97.10	95.10	95.70	NA
	Time to Post Office	95.25	97.26	95.25	92.20	95.25	95.10	95.00	95.10	NA
	Customer Support	95.10	95.10	95.10	95.10	95.10	95.10	95.10	95.10	95.10
	Business Service Network (BSN)	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Point of Sale (POS)	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Delivery	NA	77.40	NA	NA	NA	NA	NA	NA	NA
	Customer Care Center	NA	78.00	NA	NA	NA	NA	NA	NA	NA
	OSHA OSHA and Injury Rate <sup>2</sup>	5.23	5.49	5.28	6.01	5.57	5.78	5.72	6.01	5.88
Value of the Employee Survey (%)	NA	NA	65.10	65.01	65.10	64.70	64.95	64.70	64.80	

Source: NPA.

Officials stated the OSHA I&I target and actual rates for the FY 2014 *Report to Congress* were obtained from previously published reports.

### National Performance Assessment

The Postal Service did not award salary increases and lump sum payments for FYs 2011, 2012, and 2013 due to financial difficulties. It did award salary increases and lump sum payments in FYs 2010 and 2014, but they were based on achieving numerous NPA goals, which included OSHA I&I and not statistics published in the reports. The NPA reported the OSHA I&I target and actual rates, which were used to determine if goals were met and whether salary increases and lump sum payments were warranted.

The Postal Service did not meet its OSHA I&I national performance goal for FYs 2010 and FY 2014 because its actuals exceeded the target. In FY 2010, the target and actual rates were 5.23 and 5.49, respectively, and in FY 2014, the target and actual rates were 5.10 and 6.34, respectively.

Although, the Postal Service did not achieve its national performance goal for OSHA I&I for FYs 2010 and 2014, OSHA I&I was a small factor in determining salary increases and lump sum payments to recognize individual units' performance in comparison to its prior year OSHA I&I rate. In FY 2010, OSHA I&I was one of 16 national performance indicators with an allocated weight of 10 percent. Also, in FY 2014, OSHA I&I was one of 11 national performance indicators with an allocated weight of 7.5 percent. The Postal Service's erroneous OSHA I&I rates in the reports to Congress did not impact these salary increases and lump sum payments.

### Status of Prior Recommendations

Postal Service management addressed two of the four prior audit recommendations<sup>8</sup> involving compliance with OSHA recordkeeping requirements. Specifically, management updated OSHA recordkeeping procedures and automated OSHA Form 300, Log of Work-Related Injuries and Illnesses, which is required to report incidents to OSHA. However, the Postal Service stated it did not fully implement the remaining two recommendations (to establish mandatory training for officials responsible for determining OSHA recordable cases and completing related forms) because it lacked funding. Instead, it developed suggested courses online called OSHA 300 Recordkeeping and OSHA Recordkeeping Requirements.

We judgmentally reviewed training records for 153 Postal Service employees responsible for OSHA recordkeeping and found that 136 employees (89 percent) did not complete OSHA recordkeeping online courses. While online courses were developed, attendance was low. Although officials established online training for personnel responsible for determining OSHA recordable cases and completing related forms to implement our previous audit recommendation, they did not make the training mandatory to ensure appropriate personnel completed the training. Insufficient training could prevent personnel from effectively carrying out their OSHA recordkeeping responsibilities and result in citations and significant penalties to the Postal Service.

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<sup>8</sup> *Occupational Safety and Health Administration Recordkeeping Requirements* (Report Number HR-AR-11-004, dated May 27, 2011).

# Recommendations

***We recommend management establish a process to ensure that OSHA I&I statistics are accurately reported in public documents.***

We recommend the director, Strategic Planning, in coordination with the vice president, Employee Resource Management:

1. Establish a process to ensure that Occupational Safety and Health Administration Injury and Illness statistics are accurately reported in public documents.

We recommend the vice president, Employee Resource Management:

2. Require responsible personnel to complete online training for Occupational Safety and Health Administration (OSHA) 300 recordkeeping and OSHA recordkeeping requirements to ensure they are sufficiently trained to identify recordable cases and complete related OSHA forms.

## Management's Comments

Management agreed with the findings and recommendations in the report.

Regarding recommendation 1, management stated that they implemented new processes in the summer of 2015 to ensure the accuracy of all NPA metrics in the *Annual Report*. Management stated that all NPA metrics, including the OSHA I&I statistics, are accurate in the FY 2015 *Annual Report* as a result of the process changes implemented last year. The process changes included a review and validation of data in partnership with the Postal Service's External Reporting team.

Regarding recommendation 2, management agreed to require all occupational codes associated with Safety and Injury Compensation positions to complete the OSHA 300 Recordkeeping course which has been added to the required training. The target completion date is August 31, 2016.

See [Appendix C](#) for management's comments in their entirety.

## Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations and corrective actions should resolve the issues identified in the report.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendation 1 should be closed with issuance of this report since corrective actions were completed. Recommendation 2 should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed.

# Appendices

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## Appendix A: Additional Information

### Background

The Postal Service — with over 600,000 employees at over 31,000 facilities must comply with the Occupational Safety and Health Act (OSH Act). The OSH Act of 1970, administered by the OSHA, established a nationwide federal program to protect workers from job-related injury, illness, and death. The OSHA ensures these conditions by setting and enforcing standards; and providing training, education, and assistance.

Postal Service officials are required to accurately and timely prepare and maintain records<sup>9</sup> of work-related injuries, illnesses, and deaths.<sup>10</sup> The Postal Service uses OSHA I&I rates<sup>11</sup> to evaluate progress towards accomplishing one of several national performance goals. The NPA is a national report card that measures a Postal Service unit's actual corporate and unit performance against standardized, predefined, weighted indicators.<sup>12</sup> Performance indicators are defined for each level at the beginning of the year. The NPA provides the target or pre-established score marking the threshold of performance for a performance indicator.

The OSHA I&I target rate is established using historical data provided by the NPA. The annual OSHA I&I target is then approved by the Postal Service's Executive Leadership Team and the Board of Governors. The Safety and OSHA Compliance Program, the OSHA I&I indicator sponsor, is responsible for providing the NPA with monthly OSHA I&I actual rates. The NPA then compiles the actual and target I&I rates to publish on its website.

The Postal Service is required by law<sup>13</sup> to publish an annual report for the president and Congress. The Strategic Business Planning group is responsible for compiling various Postal Service operational and performance statistics in the report,<sup>14</sup> which includes the OSHA I&I target and actual rates.

### Objectives, Scope, and Methodology

Our objectives were to evaluate the accuracy of OSHA I&I rates reported to Congress and the impact of any errors on salary increases and lump sum payments and follow up on recommendations from the prior OIG report, *Compliance with Occupational Safety and Health Administration Recordkeeping Requirements* (Report Number HR-AR-11-004, dated May 27, 2011).

To accomplish our objectives we:

- Reviewed applicable policies and procedures related to OSHA I&I recording and reporting requirements.
- Interviewed Postal Service officials responsible for OSHA I&I data collection, validation, and reporting to gain an understanding of their roles and responsibilities.
- Identified the processes and procedures used to change previously reported OSHA I&I data.

9 OSHA 300A - Annual Summary Form; OSHA 301- Injury and Illness Incident Report; CA-1 - Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation; CA-2 - Notice of Occupational Disease and Claim for Compensation; and CA-7 -Claim for Compensation on Account of Traumatic Injury or Occupational Disease.

10 Recording an injury or illness neither affects a person's entitlement to workers' compensation nor proves violation of an OSHA rule.

11 The Postal Service uses "exposure" hours to calculate I&I rates in lieu of workhours because they exclude paid workhours, such as annual or sick leave.

12 Established measurement at the corporate, unit, or core requirements level. Targets are defined for each level and communicated to all employees at the beginning of the year and tracked via NPA.

13 Title 39, Section 2402 Annual Report.

14 Prior to FY 2011, the Postal Service issued two separate reports: *Report to Congress* and the *Comprehensive Statement on Postal Operations*. Beginning in FY 2011, the Postal Service incorporated its *Comprehensive Statement on Postal Operations* into the *Report to Congress* to reduce redundancy.

- Analyzed *Program Evaluation Guide* (PEG) safety reports on the Safety Toolkit to validate whether PEG was revised to include a “Recordkeeping” category.
- Reviewed the annual OSHA I&I performance goal setting process.
- Reviewed national level pay for performance payouts for FY 2010 through FY 2014 to determine when salary increases and lump sum payments were paid.
- Validated the NPA calculation of OSHA target and actual I&I rates using documentation provided by the Postal Service.
- Compared OSHA target and actual I&I rates published in the FY 2010 through FY 2014 reports to Congress to NPA.
- Assessed workhour data by comparing workhours published in the 10K report and exposure hours in the Postal Services Enterprise Data Warehouse (EDW) for FYs 2010 through 2014.
- Validated the number of incidents used for NPA by comparing the NPA validation templates to the number of incidents in EDW FYs 2010 through 2014.
- Interviewed Postal Regulatory Commission personnel to discuss its July 7, 2014, report, *Review of Postal Service FY 2013 Performance Report and FY 2014 Performance Plan*.
- Validated the implementation of recommendations issued in the *Compliance with Occupational Safety and Health Administration Recordkeeping Requirements* (Report Number HR-AR-11-004 date May 27, 2011).

We conducted this performance audit from March 2015 through April 2016, 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management on March 31, 2016, and included their comments where appropriate.

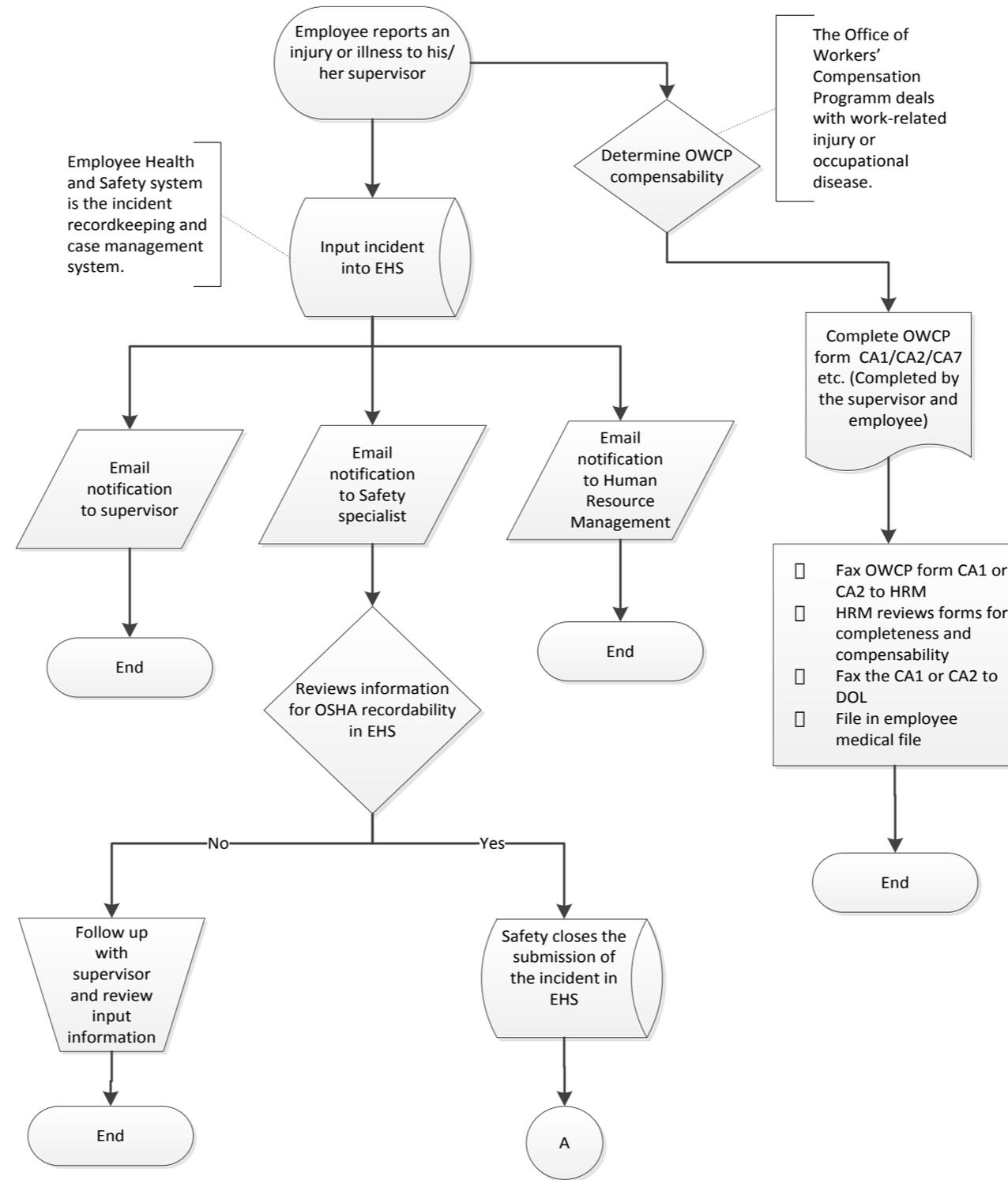
We assessed the reliability of NPA target and actual OSHA I&I rates by reviewing NPA scorecards and interviewing agency officials knowledgeable about the data. We also assessed the reliability of Postal Service workhour data by comparing data published in the 10K report and data retrieved from the EDW. We determined the NPA data and workhour data were sufficiently reliable to support the findings in this report.

## Prior Audit Coverage

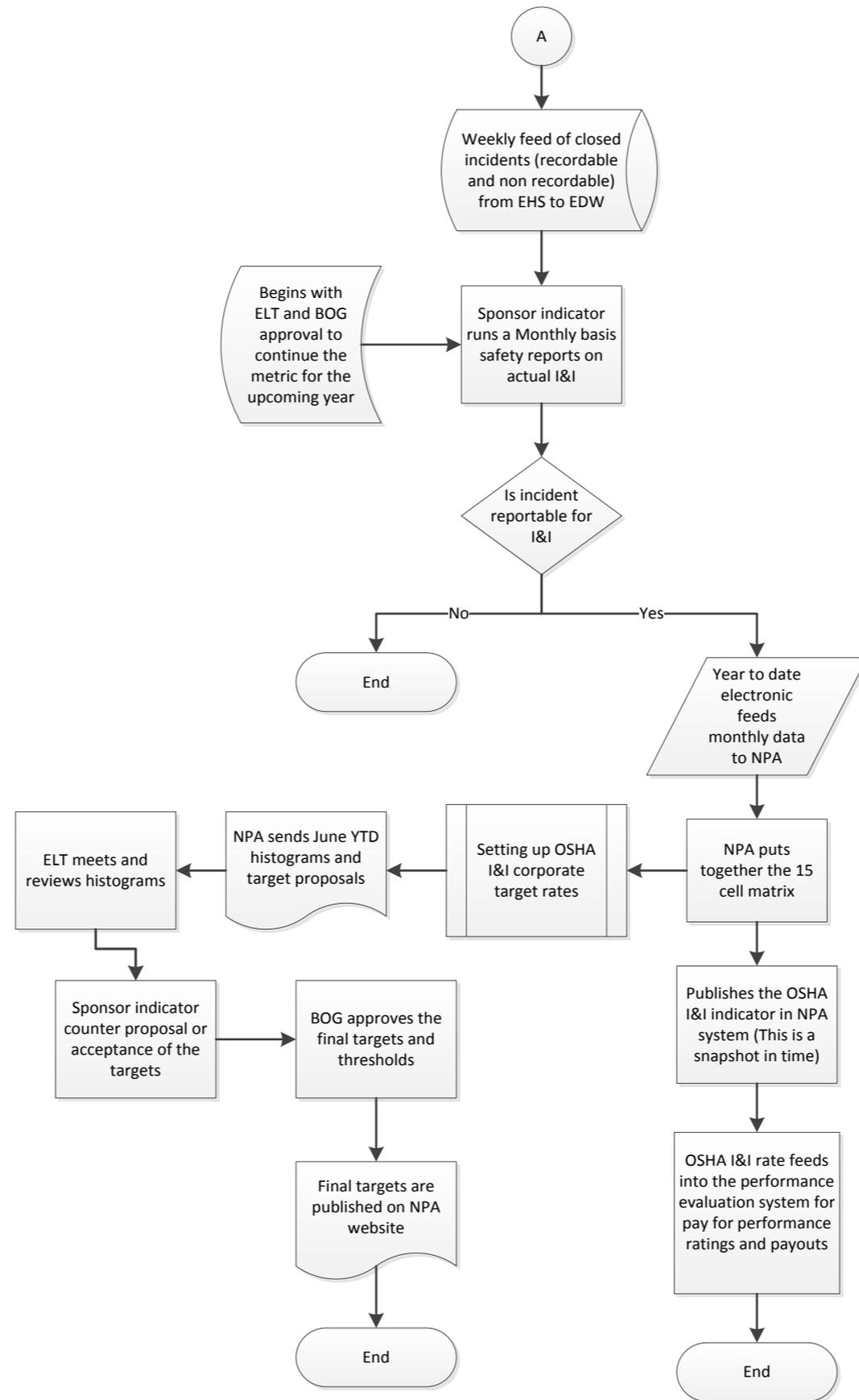
The OIG issued *Compliance with Occupational Safety and Health Administration Recordkeeping Requirements* (Report Number HR-AR-11-004, dated May 27, 2011), and found the Postal Service did not always record and report injuries and illnesses in accordance with OSHA requirements. Potential OSHA recordkeeping violations were found at 23 of 24 facilities reviewed (96 percent). OSHA Forms 300 and 301 reviewed for each facility for years 2009 and 2010 were not always complete or accurate. Specifically, 43 of 48 OSHA Forms 300 (90 percent) and 12 of 48 OSHA Forms 301 (25 percent) contained errors or were incomplete.

We recommended the Postal Service enhance procedures to ensure officials are appropriately identifying, classifying, recording, and communicating OSHA injuries; revise the Postal Service's OSHA Recordable Date policy to clarify how to determine recordable dates when they differ from the initial injury or illness date; complete the automation capability for Form 300 in the Employee Health and Safety system; and establish mandatory training for officials responsible for determining OSHA recordable cases and completing related forms. Management agreed with the findings and recommendations.

# Appendix B: Occupational Safety and Health Administration Injury & Illness Incident Reporting Process<sup>15</sup>



<sup>15</sup> CA-1, Notice of Traumatic Injury, is completed for job-related traumatic injuries, including first-aid cases; CA-2, Notice of Occupational Disease, is completed for occupational diseases and illnesses, such as carpal tunnel; and CA-7, Claim for Compensation, is used to claim compensation when the employee loses wages due to the work injury.



## Appendix C: Management's Comments



April 19, 2016

LORI LAU DILLARD  
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Postal Service Reporting of Occupational Safety and Health  
Administration Injury and Illness Rates (Project Number  
15RG023HR00)

Please see below the comments in response to your draft report titled Postal Service Reporting of Occupational Safety and Health Administration Injury and Illness Rates. The USPS offices of Strategic Planning and Employee Resource Management appreciate the opportunity to review and provide comments to this draft report.

We have no fundamental disagreements with any of the findings or recommendations.

**Recommendation 1:**

*The OIG recommends that the Director, Strategic Planning, in coordination with the Vice President, Employee Resource Management:*

*Establish a process to ensure Occupational Safety and Health Administration Injury and Illness statistics are accurately reported in public documents.*

**Management Response:** Management agrees with the recommendation and the Director of Strategic Planning, in coordination with the functional leads of the VP, Employee Resource Management, implemented new processes in the summer of 2015 to ensure the accuracy of all National Performance Assessment (NPA) metrics in the Annual Report (*the Annual Report includes these documents: The Annual Report to Congress, The Annual Performance Report, The Annual Performance Plan, and The Comprehensive Statement on Postal Operations*). All NPA metrics, including the Occupational Safety and Health Administration Injury and Illness statistics, are accurate in the Fiscal year 2015 Annual Report as a result of the process changes implemented last year. These process changes include a review and validation of data in partnership with the USPS External Reporting team. No further action is required.

**Target Implementation Date:**

Completed

**Responsible Official:**

N/A

**Recommendation 2:**

*The OIG recommends that the VP, Employee Resource Management:*

*Require responsible personnel to complete the online training for Occupational Safety and Health Administration (OSHA) 300 recordkeeping and OSHA recordkeeping requirements to ensure they are sufficiently trained to identify recordable case and complete related OSHA forms.*

**Management Response/Action Plan:**

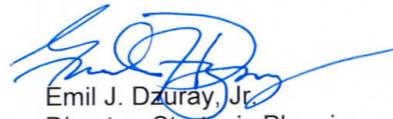
LMS Course #10021643 (OSHA 300 Recordkeeping) is being required of all occupation codes associated with Safety and Injury Compensation positions. The course has been added to the required training of these employees with a completion date of August 31, 2016.

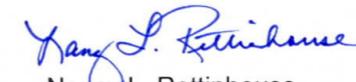
**Target Implementation Date:**

August 31, 2016

**Responsible Official:**

Manager, Safety and OSHA Compliance

  
Emil J. Dzuray, Jr.  
Director, Strategic Planning

  
Nancy L. Rettinhouse  
VP, Employee Resource Management

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