



Office of Inspector General | United States Postal Service

Audit Report

Opioid Safety Preparedness

Report Number HR-AR-18-006 | June 18, 2018



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Highlights

Objective

This report responds to a request from the U.S. House Committee on Oversight and Government Reform to review measures the U.S. Postal Service has implemented regarding opioid safety preparedness. Specifically, the congressional inquiry focused on Postal Service procedures, training, and communications related to employee exposure risks to synthetic opioids and opioid overdose medication.

Our objective was to assess measures the Postal Service has implemented to prepare its workforce for the risks posed by shipments of synthetic opioids.

Opioids are substances that produce morphine-like effects and are primarily used for pain relief. Synthetic opioids are man-made drugs that mimic the effects of natural opioids. There has been a dramatic increase in the availability of dangerous synthetic opioids, with a majority being structural derivatives of the synthetic drug fentanyl.

There has also been increased congressional interest in the flow of opioids through the U.S. mail system, both internationally and domestically. Consequently, any mailpiece containing synthetic opioids is a potential danger to those who are involved in the acceptance, processing, and delivery of mail.

What the OIG Found

The Postal Service has not implemented specific measures to prepare its entire workforce for risks posed by synthetic opioids shipped through the mail. The Postal Service generally considers these risks to fall within its established

“There has been a dramatic increase in the availability of dangerous synthetic opioids, with a majority being structural derivatives of the synthetic drug fentanyl.”

suspicious mail protocols. However, different types of substances, such as synthetic opioids, can pose differing levels of risk. Considering the national concern associated with the opioid epidemic, we believe opportunities exist to increase employee awareness of risks associated with opioid exposure and the importance of adhering to established suspicious mail protocols.

While there have been specific measures implemented to educate and protect U.S. Postal Inspection Service inspectors regarding synthetic opioid exposure, the Postal Service has not provided specific synthetic opioid information to all of its employees. Employees are also not always adhering to existing protocols when handling hazardous or suspicious mail. We found indications of deviation from proper suspicious mail handling procedures in 18 of 97 incident documentation forms reviewed. One incident involved an unidentified white powder that leaked from the mail onto processing equipment. The supervisor reportedly instructed employees to continue running the equipment without properly responding to the powder.

Further, we were not able to validate that mandatory stand-up talks specific to suspicious mail protocols were completed for all employees for fiscal years 2016 and 2017. Additionally, no Postal Service employees, other than select inspectors, were provided opioid overdose medication and it has not been made available at any Postal Service facility. However, at the exit conference in May 2018, the Postal Service provided its plan to deploy opioid overdose medication at 705 facilities nationwide.

Finally, there is a need to promote awareness of the Postal Service’s packaging requirements for hazardous items among law enforcement agencies and others who are approved to ship controlled substances through the mailstream.

These conditions occurred because management has not addressed opioids as a stand-alone threat and contends that their established protocols are sufficient to cover all unknown powders and substances, including synthetic opioids. In addition, employees may not fully understand hazardous and suspicious mail protocols or the potential consequences of noncompliance.

Further, there was no formal guidance communicating mandatory requirements to conduct suspicious mail stand-up talks at a prescribed frequency, no method for identifying who should receive the stand-up talk, and no formal procedure for certifying completion of stand-up talks.

Without a strategic approach to addressing the risks of exposure to opioids in the mail—including clear, specific communication, education, and training—the Postal Service is not taking every precaution to ensure the safety and health of its employees.

What the OIG Recommended

We recommended management communicate to all employees information specific to synthetic opioids, identify which learning management system courses should be mandatory, and formally document the prescribed frequency for conducting suspicious mail stand-up talks. We also recommended management execute the deployment strategy for opioid overdose medication; develop a communication strategy to increase awareness of *Publication 52: Hazardous, Restricted, and Perishable Mail* to approved mailers; and assess package marking requirements for controlled substances.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

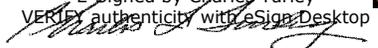
June 18, 2018

MEMORANDUM FOR: GUY COTTRELL
CHIEF POSTAL INSPECTOR

DAVID E. WILLIAMS, JR.
CHIEF OPERATING OFFICER AND
EXECUTIVE VICE PRESIDENT

JEFFREY WILLIAMSON
CHIEF HUMAN RESOURCES OFFICER AND
EXECUTIVE VICE PRESIDENT

E-Signed by Charles Turley
VERIFY authenticity with eSign Desktop



FROM: Charles L. Turley
Deputy Assistant Inspector General
for Supply Management & Human Resources

SUBJECT: Audit Report – Opioid Safety Preparedness
(Project Number 18SMG002HR000)

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

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our audit of the U.S. Postal Service's opioid safety preparedness (Project Number 18SMG002HR000). This report responds to a request from the U.S. House Committee on Oversight and Government Reform to review measures the Postal Service has implemented regarding opioid safety preparedness. Our objective was to assess measures the Postal Service has implemented to prepare its workforce for the risks posed by shipments of synthetic opioids through the mail. Specifically, the congressional request inquired about:

- Procedures, training materials, and communication plans in place to help postal employees and inspectors at international mail centers, in domestic processing centers, and on mail delivery routes identify and protect themselves from synthetic opioids (see [Finding 1](#) for response).
- Documents referring or relating to the availability of naloxone or other opioid overdose medication for employees at international mail centers, in domestic processing centers, and on mail delivery routes, including the type of products available and the actual or estimated overall and per unit costs of supplying such medications (see [Finding 3](#) for response).
- Documents referring or relating to procedures the Postal Service implemented following the 2001 anthrax attack available to protect employees from synthetic opioids (see [Other Matters](#) for response).

Background

In October 2017, the President of the U.S. declared opioids to be “a national health emergency under federal law.”¹ In addition, there has been increased congressional interest in the flow of opioids through the U.S. mail system, both internationally and domestically.

The majority of illicit fentanyl is produced in other countries (such as China) and trafficked to the U.S. through Postal Service International Service Centers

(ISC), express consignment carrier facilities (e.g., FedEx and UPS), or points of entry along the southern land border. During fiscal year (FY) 2017, the U.S. Postal Inspection Service (USPIS)² seized 11,992 packages containing drugs, 289 of which contained drugs which were suspected to be fentanyl or a fentanyl analogue.

Opioids

Opioids are substances that produce morphine-like effects and are primarily used for pain relief. Synthetic opioids are man-made drugs that mimic the effects of natural opioids. Semi-synthetic and synthetic opioids include hydrocodone, oxycodone and fentanyl, and antagonist drugs (antidotes) such as naloxone. There has been a dramatic increase in the availability of dangerous synthetic opioids, with the majority being structural derivatives of the synthetic drug fentanyl.

In its pure powder form, fentanyl, which is odorless, is about 50-100 times more powerful than morphine. Fentanyl is available in pill form, as a film that dissolves in the mouth, a transdermal patch which delivers the drug directly through the skin, and even in lollipop form. Some synthetic opioids are more potent than others. For example, carfentanil, an analogue of fentanyl, is up to 10,000 times more potent than morphine.

Exposure Risk

Drugs absorbed through the skin can have the same effect as taking them in more conventional ways, causing inebriation, health problems, overdose, and even death.³ Exposure to fentanyl may be fatal. Fentanyl can be absorbed into the body via inhalation of airborne powder, oral exposure or ingestion, and through a mucous membrane or skin contact. It is not known whether fentanyl can be absorbed systemically through the eye. Inhalation of airborne powder is most likely to lead to harmful effects, but may be less likely to occur than skin contact.

¹ Merica, Dan, October 26, 2017, *Trump Declares Opioid Epidemic a National Public Health Emergency*.

² The U.S. Postal Inspection Service is a federal law enforcement, crime prevention, and security arm of the Postal Service.

³ Burgess, Beth, *Can You Accidentally Overdose on Drugs Just by Touching Them?*

Any of these exposure routes could potentially result in a variety of symptoms, including disorientation, coughing, or sedation. Respiratory distress or cardiac arrest could occur within seconds of exposure. Brief skin contact with fentanyl or its analogues is not expected to lead to toxic effects if any visible contamination is promptly removed. This level of contact is also not likely to lead to overdose unless large volumes of highly concentrated powder are encountered over an extended period of time.⁴ However, skin contact could potentially lead to inhalation or ingestion, if a person who experienced skin exposure touches their nose or mouth.

Experts agree that the powerful synthetic opioid fentanyl and its even deadlier relatives pose potential hazards to anyone who comes in contact with the drugs; however, there is also concern that the risks have been overstated, potentially creating unnecessary stress for emergency workers. For example, the Drug Enforcement Administration (DEA) declares that “it would only take 2 to 3 milligrams of fentanyl to induce respiratory depression, arrest, and possibly death.”⁵ As Dr. Andrew Stolbach, an emergency physician and medical toxicologist,⁶ agreed that this amount would be sufficient to make most people stop breathing, he also asserted that fentanyl is not absorbed through skin into your blood quickly or efficiently enough to make this kind of dose possible from incidental contact. He further stated that fentanyl is absorbed much better by inhalation and through mucous membranes.⁷ To date, there are no established federal or consensus occupational exposure limits for fentanyl or its analogues.

Under any circumstance, one should take precautions to reduce the risk of exposure to any suspected drug when handling hazardous substances, regardless of whether or not it is suspected of containing fentanyl.

Postal Service Network

The Postal Service delivers mail to more addresses in a larger geographical area than any other post in the world. On average, the Postal Service processes and delivers about 506.4 million mailpieces per day. The Postal Service leverages a

vast resource pool and network infrastructure to deliver to every residential and business address in the nation (see [Appendix B](#) for mail flow overview).

As of FY 2017, the Postal Service facility network consisted of more than 35,000 facilities, including more than 300 processing facilities, five ISCs, and one mail recovery center. Key Postal Service facts are included in Table 1.

Table 1. FY 2017 Postal Service Facts

Resources	
Employees	644,124
Facilities	
Processing Facilities	306
Offices, Stations, and Branches	35,005
International Service Centers	5
Mail Recovery Center	1
Mail Volume	
International	1,003,000,000
Domestic	148,488,000,000

Source: U.S. Postal Service Office of Inspector General (OIG) analysis.

Any mailpiece containing synthetic opioids is a potential danger to those who are involved in accepting, processing, delivering, and receiving the mail. Postal Service management must demonstrate a commitment to providing a safe and healthy working environment in all of its facilities. The Postal Service’s safety philosophy⁸ states that supervisors and managers have primary responsibility for the well-being of employees and that:

4 The National Institute for Occupational Safety and Health, *Fentanyl: Preventing Occupational Exposure to Emergency Responders*.

5 U.S. DEA, *A Briefing Guide for First Responders*.

6 Dr. Andrew Stolbach is board certified in emergency medicine and medical toxicology. He leads the toxicology training curricula and works clinically at the Johns Hopkins Hospital.

7 McCullough, Marie, *Overdose Just By Touching Fentanyl? Highly Unlikely, Experts Say*, July 2, 2017.

8 *Employee and Labor Relations Manual (ELM)*, Issue 43, Section 811.24, dated September 2017.

- “Any occupational injury or illness can be prevented.”
- “Management, which encompasses all levels including the first-line supervisor, is responsible and accountable for the prevention of accidents and control of resultant losses.”
- “It is possible to safeguard against all operating exposures that can result in accidents, injuries, and illnesses. It is preferable to eliminate the sources of danger.”
- “All employees must be trained in proper work procedures and must be educated to work safely and to understand that they are responsible for doing so. Management is responsible for the adequate safety training and education of employees. However, all employees are responsible for working safely, and in doing so, they benefit not only themselves but also their organization.”

Finding #1: Communication on Synthetic Opioids

The Postal Service has not communicated information specifically related to synthetic opioids to all of its employees. Management has decided to increase communication on current hazardous and suspicious mail protocols rather than communicate information specifically related to synthetic opioids. The USPIS is the only Postal Service function that has issued any specific communications or guidance to its own employees regarding synthetic opioids.

Within the USPIS, management has revised its Dangerous Mail Investigations and Prohibited Mailing Narcotics program to include specific communication and protocols on the risks associated with, and handling of, synthetic opioids.

The communications addressed the following areas:

- Personal Protective Equipment (PPE)
- Field Testing Controlled Deliveries and Building Entries
- Naloxone
- First-Aid Procedures

With regards to all other Postal Service employees, management has determined that synthetic opioids fall within current hazardous and suspicious mail protocols. In a December 20, 2017, response to a stakeholder inquiry regarding the Postal Service’s strategy to address the dangers of opioids in the mail, the Vice President, Labor Relations, stated, “the best course of action for our employees is to refrain from opening or unnecessarily handling suspicious packages and follow the Postal Service’s well-established protocol.”

As such, to reiterate the risks associated with exposure to and handling of any potential suspicious mail, management began the process of reinforcing awareness of current protocols via stand-up talks and posters. Additionally, during the holiday season when mail volume typically increases, management mailed postcards to all employees providing an overview of current hazardous and suspicious mail protocols. Those protocols include:

1. Leaving the mail item or substance where it was and not disturbing it or trying to clean it up.
2. Clearing people from the immediate area and keeping others away.
3. Instructing anyone who may have had contact with the item or substance to wash hands and other exposed skin with soap and water.
4. Shutting down all equipment in the immediate area as well as all heating, ventilation, and air conditioning systems.
5. Calling the USPIS.

In the past, the Postal Service has communicated the risks of specific hazardous and suspicious mail contents. In response to the 2001 anthrax attacks, the Postal Service issued a memorandum of policy (MOP)⁹ that communicated specific instructions for employees on the workroom floor and included awareness documents¹⁰ to be used as guides for stand-up talks. The communications provided employees with key information about the definition, symptoms, and treatment of anthrax exposure. Also, in 2013, management held a stand-up talk for employees that specifically referenced a hazardous material

⁹ *Anthrax Awareness, Protection and Reporting*, dated October 24, 2001.

¹⁰ Mandatory safety talk on anthrax and anthrax talking points.

— ricin — which had travelled through the mailstream.¹¹ These are examples of management specifically identifying a risk or threat and communicating related information to employees.

Additionally, in its 2004 report on the Postal Service’s response to the anthrax contamination,¹² the Government Accountability Office (GAO) stated that a key lesson from that experience is that it is important for agencies to err on the side of caution when considering taking action to protect people from uncertain and potentially life-threatening health risks. That report further indicated that the key lesson of sharing information in a timely manner is critical to an effective response.

Without specific communication related to synthetic opioids, employees may not be fully aware of the risks presented by or signs of this increasing threat. In addition, communication gaps can lead to increased likelihood of employees not understanding and/or adhering to policy or protocols.

Recommendation #1

The Chief Operating Officer and Executive Vice President, in coordination with the Chief Human Resources Officer and Executive Vice President, reinforce current suspicious mail protocols and issue communication specific to synthetic opioids to all employees.

Finding #2: Adherence to Suspicious Mail and Unknown Powders or Substances Protocols

Postal Service employees are not always adhering to protocols when handling hazardous or suspicious mail. The Postal Service has multiple tools and avenues for reporting and tracking incidents related to suspicious mail and unknown powders or substances. These tools include:

- **Mail Incident Report Tool (MIRT):**
A tool for reporting leaks or spills from mailpieces, non-mailable items, and/or air carrier returns.
- **Postal Alert Notification System (PANS):**
A system that enables real-time data entry, analysis, and response to natural and man-made emergency incidents.
- **Inspection Service Watch Desk:**
Information alerts about critical events that may have national implications and require immediate action.
- **PS Form 1767, Report of Hazard, Unsafe Condition or Practice:** Form that captures the employee’s description of a hazard or unsafe practice they observed and the supervisor’s response.

“Many of the deviations related to suspicious or leaking packages being moved, not immediately being isolated, or employees attempting to clean an unknown substance.”

To assess the type of incidents reported and documented, we reviewed¹³ PS Forms 1767 entered into the Safety Toolkit¹⁴ during FYs 2016 and 2017. Of the 32,194 records in the Safety Toolkit for these two years, we identified 313 that may have involved suspicious mail and unknown powders and substances, based on a keyword search in the Hazard Description field. We reviewed 97¹⁵ randomly selected records to review handling of suspicious mail and unknown powders or substances. Of these, 18 (or 19 percent) documented a deviation from proper procedures regarding suspicious mail. Many of the deviations related to suspicious or leaking packages being moved, not immediately being isolated, or employees attempting to clean an unknown substance. Examples of incidents documented on PS Forms 1767 include:

11 Mandatory stand-up talk, *Employee Safety Paramount Following Suspicious Letter Report*, dated May 15, 2013.

12 Report Number GAO-04-239, *Better Guidance Is Needed to Ensure an Appropriate Response to Anthrax Contamination*, dated September 2004.

13 The American Postal Workers’ Union (APWU) also communicated concerns related to PS Form 1767 to the OIG during this audit.

14 A web application designed to assist Postal Service safety personnel in the collection, tracking, analysis, and reporting of safety and health-related information.

15 We randomly selected 123 of the 313 records to identify reported incidents. Twenty-six of these forms did not pertain to incidents involving suspicious mail and unknown powders or substances, so we reviewed 97 PS Forms 1767.

- On July 13, 2017, a liquid was leaking onto several parcels. The supervisor was informed and instructed the clerk to put on gloves and place the damaged parcels in a bag.
- On July 7, 2017, an unidentified white powder leaked from the mail onto processing equipment. After being informed, the supervisor reportedly instructed employees to continue running the equipment without properly responding to the powder.
- On October 7, 2016, an employee reported finding Mail Transport Equipment (MTE) with some white substance on the bottom and informed the supervisor. The next day the employee reported seeing the same MTE with the same white substance on it.
- On November 6, 2016, employees reported an unknown powder to the supervisor. The maintenance supervisor reportedly investigated the incident by smelling the powder and blowing the substance onto the floor.

In addition, in three of the 18 incidents, employees reported having come in direct contact with a suspicious powder or substance, including:

- On March 11, 2017, an employee at the Reno, NV, Post Office needed to reach a supervisor because powder from a leaking letter had leaked onto the employee's face, hands, arm, and leg. The employee reportedly did not receive an immediate response and had to call two supervisors' cell phones before reaching anyone.
- On May 13, 2016, an employee at the Cincinnati Network Distribution Center reported having come into contact with an unknown brown liquid leaking from a damaged box.
- On March 31, 2017, an employee at the Frederick, MD, Post Office lifted a package leaking an unknown substance and the liquid spilled on the employee's pants.

Postal Service policy states that, "all employees must be trained in proper work procedures and educated to work safely and to understand that they are

responsible for doing so. Management is responsible for the adequate safety training and education of employees; however, all employees are responsible for working safely and, by doing so, they benefit both themselves and the organization."¹⁶ Additionally, Postal Service policy instructs employees not to handle any suspicious letter or package. When an employee encounters any suspicious mail and unknown powder or substance, facility management must isolate the mail item or substance, clear people away from the area, and contact the USPS for response.

These issues may have occurred due to employees not fully understanding hazardous and suspicious mail protocols or the potential consequences of noncompliance. During an assessment of trainings available to employees through the Postal Service's Learning Management System (LMS), we identified that employees are underusing the training in this tool. As part of this audit, management identified 16 LMS courses related to suspicious, anonymous, or dangerous mail. Of 208 randomly selected employees, only 20 had completed any of the courses within the last five years. See [Appendix C](#) for a description of the 16 LMS courses.

When employees do not follow proper protocols for handling hazardous or suspicious mail, specially unknown powders or substances, there is an increased risk to the safety of that employee and others. The most severe risk impact could result in serious injury to or death of an employee.

Recommendation #2

The Chief Human Resources Officer and Executive Vice President identify which hazardous and suspicious mail Learning Management System courses should be mandatory, and promote completion to intended employee audiences to reinforce compliance with protocols.

Finding 3: Stand-Up Talks

The Postal Service cannot validate that stand-up talks specific to suspicious mail were completed for all employees for FYs 2016 and 2017.

¹⁶ ELM, Issue 43, Section 811.24d, dated September 2017.

Stand-up talks are a tool the Postal Service uses to reinforce employee understanding and awareness of key topics, including safety. Typically upon completion of a stand-up talk, there is a certification process to ensure the facility provided the talk and that all employees received it. Currently, there is a stand-up talk specific to recognizing and handling suspicious mail that must be conducted.¹⁷ However, there was no required frequency for giving these stand-up talks and certification of suspicious mail stand-up talks was not formally or consistently tracked prior to November 2017.

We found multiple instances of correspondence sent to field management by headquarters regarding conducting the suspicious mail stand-up talk. Between January 2017 and February 2018, headquarters operations personnel sent a series of emails¹⁸ to field management instructing them to deliver the suspicious mail stand-up talk, with the expectation that they would do so soon after receiving the email. One of the email distribution lists included only mail processing plant management and the other five email distribution lists included more broad management groups, to include area vice presidents.

In these communications, headquarters only required mail processing plant management to certify completion of the stand-up talk and did not require any certification for the remaining five groups who were instructed to conduct stand-up talks.

In the email that was distributed only to mail processing plant managers, headquarters operations required them to certify the stand-up talk was completed and that all employees attended. The email included an online survey tool to track certification. The email was sent to 246 mail processing facilities and all 246 plant managers certified the stand-up talk was conducted and all employees attended; however, headquarters operations did not require plant management to retain supporting documentation, such as sign-in sheets, to verify employee attendance.

Notwithstanding the certification process that applied only to the stand-up talk for processing plants, we identified other facilities that used the Safety Toolkit to

assign¹⁹ and track completion of hazardous and suspicious mail stand-up talks in FY 2018. As of January 31, 2018, we identified:

- There were 1,244 suspicious mail stand-up talks that had been assigned in the Safety Toolkit at 1,121 facilities.
 - Of those, 990 were assigned by districts as mandatory and 713 were completed.
 - The remaining 254 were assigned by facilities as non-mandatory and all were completed.

Postal Service policy does not provide guidance on the required frequency for conducting the hazardous or suspicious mail stand-up talk; however, in response to an APWU inquiry, management indicated that, “At minimum twice a year, the Postal Service requires a mandatory stand-up talk to be provided at all facilities regarding the proper treatment of suspicious mail...The stand-up talk covers awareness of a variety of suspicious mail and unknown powders or substances that could be found in the mail.”

The Postal Service’s inability to validate that stand-up talks specific to suspicious mail were completed for all employees occurred because there was not a requirement to conduct suspicious mail stand-up talks at a prescribed frequency, a way to identify employees who received the stand-up talk, or a formal process to certify completion of stand-up talks.

Without clear guidance on stand-up talk requirements, there is an increased likelihood that the stand-up talk will not be conducted or will not reach the intended audience. If management is not reinforcing awareness in the area of suspicious or hazardous mail through stand-up talks, the most severe risk impact could result in serious injury to or death of an employee.

In March 2018, management indicated they would standardize the issuance and tracking of the suspicious mail stand-up talks by using the Safety Toolkit to assign

¹⁷ Mandatory stand-up talk, *Recognizing and Handling Suspicious Mail*.

¹⁸ Instructions were provided to recipients via six separate email distributions.

¹⁹ As of February 23, 2018, the suspicious mail stand-up talk was added to the Safety Toolkit library and assigned as mandatory at the district, area, and national levels.

and track certification of completion for all facilities. During the May 3, 2018, exit conference,²⁰ management stated they had directed all facilities to provide the suspicious mail stand-up talks in March. An overview of the process includes:

- Management enhanced the Safety Toolkit by creating the functionality of assigning mandatory safety talks at the district, area and national levels and added the suspicious mail stand-up talk to the Safety Toolkit library.²¹
- Beginning in March 2018, headquarters safety management will issue the suspicious mail stand-up talk as a mandatory talk twice a year at all facilities, regardless of size or function. Each facility head will be required to give the stand-up talk to all employees, certify completion of the stand-up talk, and retain supporting documentation.
- On March 20, 2018, headquarters safety officials notified, via an email, field management that the suspicious mail stand-up talk had been assigned at the national level as a mandatory talk.

The new process will be administered by the Safety and OSHA Compliance Program, which has oversight of the Safety Toolkit. As management indicated the suspicious mail stand-up talk should be given twice a year, the Safety Toolkit only indicates it as mandatory, with no prescribed frequency. Management asserted they would provide communication as to when the suspicious mail stand-up talk should be conducted; however, no formal documentation was provided to support the twice a year assertion.

Subsequent to the exit conference, we validated that as of May 4, 2018, there were 31,198 facilities that had certified completion of the suspicious mail stand-up talk in the Safety Toolkit.

Recommendation #3

The Chief Human Resources Officer should formally document the prescribed frequency of twice per year for the Recognizing and Handling Suspicious Mail Stand-up Talk to be conducted.

Finding #4: Availability of Opioid Overdose Medication

The Postal Service has provided Naloxone (Narcan) kits and associated education to select USPIS employees; however, it did not provide other Postal Service employees with the kits or associated education. Narcan has also not been made available at any Postal Service facility, ISC²², mail processing center, or the mail recovery center.

Narcan is an antidote that can be administered to reverse an accidental overdose of opioids or fentanyl exposure. Narcan is as non-toxic as water and has no potential for addiction, nor does it have any effect on a person who has not used heroin or other opioids.

In 2017, the USPIS deployed Narcan to select inspectors as part of its revised Prohibited Mailing Narcotics program. Based on the associated risk of opioids and fentanyl and the nature of its work, USPIS has implemented the following measures pertaining to fentanyl education and the administration of Narcan:

- Developed formal guidelines for handling fentanyl consistent with procedures established by other agencies, including the DEA, Centers for Disease Control and Prevention, and the White House Office of National Drug Control Policy.
- Deployed Narcan to its 17 division offices,²³ Postal Service ISCs, and USPIS forensic lab. During FY 2017, the USPIS purchased 492 Narcan kits, at \$75 per unit, for a total cost of \$37,087, and budgeted to purchase an additional 260 kits for \$19,599 in FY 2018. The Narcan kits each have a shelf life of about 18 months and must be replaced as they expire.

²⁰ The purpose of the exit conference is to communicate audit results to management to: ensure the accuracy of information used to develop findings, recommendations, and potential monetary benefits; resolve matters that are in dispute before the draft report is issued; and, provide added assurance that management and OIG positions are clearly understood for inclusion in the draft report.

²¹ Contains a comprehensive listing of safety talks within the Safety Toolkit that have been approved by headquarters safety personnel.

²² USPIS made Narcan available to inspectors located at ISCs.

²³ Narcan was further distributed to inspectors who were part of the Prohibited Mailing Narcotics (PMI) program.

- Implemented required online training on the use of Narcan for select inspectors. As of October 2017, training logs indicate that 1,152 inspectors have completed the required training.

The Postal Service's safety philosophy²⁴ is that supervisors and managers have primary responsibility for the well-being of employees and, therefore, must demonstrate a commitment to providing a safe and healthy working environment for all facilities. Management has not distributed Narcan kits to facilities or to all employees because they decided to rely on current suspicious mail protocols while assessing whether supplementary actions and protocols would be necessary.

Without Narcan being accessible to all employees or at facilities, the antidote will not be available to employees in the case of a synthetic opioid exposure. The most severe risk impact of this lack of availability could result in serious injury to or death of an employee.

On May 3, 2018, during the exit conference, the Postal Service first discussed their plan to deploy Narcan nasal spray as an emergency first response measure to complement existing protocols regarding suspicious mail and hazardous substances. Subsequent to the exit conference, management provided the details of the plan to include:

- Purchasing 2,820 boxes of Narcan, each containing two doses, for about \$200,000. The Postal Service will deploy the medication to 705 postal facilities nationwide including mail processing facilities, large post offices, stations, and branches.²⁵ Each facility will receive four boxes for a total of eight doses per location. Deployment is tentatively scheduled for June through August 2018.

- Prior to deployment, employees in the targeted locations will be trained on how to properly use Narcan via mandatory participation in a newly developed stand-up talk titled *Narcan® Nasal Spray Distribution*, and completion of a new LMS course titled *Narcan Responder Training*.

Recommendation #4

The Chief Operating Officer and Executive Vice President, in coordination with the Chief Human Resources Officer and Executive Vice President, should execute Narcan deployment strategy as planned, and assess whether Narcan should be deployed at additional facilities.

Finding #5: Shipping Controlled Substances

Although controlled substances,²⁶ including (synthetic) opioids, flowing through the mailstream pose a safety risk for Postal Service employees, there are circumstances when controlled substances may legally be transported through the mailstream. For controlled substances to legally be transported through the mailstream, the Postal Service has prescribed conditions and requirements, outlined in its *Publication 52: Hazardous, Restricted, and Perishable Mail*,²⁷ that should be met.

The purpose of Publication 52²⁸ is to provide information and guidance for mailing potentially hazardous, restricted, or perishable matter to domestic and international destinations.

²⁴ ELM Issue 43, Sections 811.21a and 811.24a, dated September 2017.

²⁵ The larger facilities were selected based on First Handling Pieces (FHP), which is mail volume recorded in the operation where it receives first distribution handling.

²⁶ A controlled substance is any anabolic steroid, narcotic, hallucinogenic, stimulant, or depressant drug identified in Schedules I through V of the Controlled Substances Act in 21 U.S.C. 801 and the implementing regulations in 21 CFR 1300.

²⁷ Section 453, Controlled Substances and Drugs.

²⁸ This guidance is publicly available on the U.S. Postal Services website at <https://pe.usps.com/text/pub52/welcome.htm>.

The publication communicates to mailers the following key guidance related to shipping controlled substances:

<p>Mailer Responsibility</p>	<p>When shipping controlled substances, mailers must comply with Postal Service regulations and other federal laws and regulations, such as the Poison Prevention Packaging Act and the Consumer Product Safety Act. In addition, mailers must be aware of substance characteristics that may affect mailability²⁹ — such as flammable, toxic, or corrosive features.</p>
<p>Mailability</p>	<p>For mailable controlled substances, generally both the mailer and addressee must either be registered with the DEA, or be exempted from DEA registration, such as military, civil defense, and law enforcement personnel, in performing official duties. In addition, mailers conducting mail-back programs, and drug manufacturers or their registered agents, pharmacies, medical practitioners, or other authorized dispensers may also mail controlled substances.</p>
<p>Packaging and Marking Requirements</p>	<p>Mailers must securely package all drugs so that the contents cannot become damaged or dislodged during mailing. Mailers must also mark and seal the inner packaging in accordance with the applicable provisions and regulations of the Controlled Substances Act. For controlled substances, no markings of any kind that indicate the nature of the contents may appear on the outside of the mailpiece.</p>

In addition to Postal Service guidance, other entities that are legally allowed to transport controlled substances have prescribed policies and procedures to safeguard the package and mitigate potential safety exposure risk. For example:

- The USPIS has prescribed policies and procedures²⁹ for transporting controlled substances related to property/evidence (PE). Per policy:

■ [REDACTED]

■ [REDACTED]

- Federal and state forensic laboratories maintain evidence submission procedures that apply to the law enforcement agencies they service. For example:
 - The FBI's Laboratory Division instructs agencies submitting evidence to place it in a clean, dry, and previously unused inner container, seal the inner container with tamper-evident or filament tape, and ship the evidence by Registered Mail, UPS, or FedEx.
 - The Georgia Bureau of Investigations, Division of Forensic Sciences, requires evidence containers to be appropriately selected for each evidence type, adequately labeled, securely closed, and sealed, and suggests Certified or Registered mail for shipping.

The opioids epidemic has increased the likelihood of these substances being transported through the mailstream for legitimate law enforcement purposes. Law enforcement agencies often ship these substances to forensic laboratories for identification. According to the most recent Bureau of Justice Statistics data, there were 17,985 state and local law enforcement agencies as of 2008,³⁰ and 409 publicly funded forensic crime laboratories as of 2014.³¹ More than eight in 10 (81 percent) laboratories handled the identification of illegal drugs and other controlled substances, which could potentially have been shipped via the Postal Service.

In conclusion, there are circumstances in which controlled substances can legally travel through the mailstream. To help mitigate the risk associated with

²⁹ *Inspection Service Manual*, Chapter 8, Property/Evidence.

³⁰ Bureau of Justice Statistics, *Census of State and Local Law Enforcement Agencies*, 2008.

³¹ Bureau of Justice Statistics, *Publicly Funded Forensic Crime Laboratories: Resources and Services*, dated 2014.

these packages, the Postal Service has prescribed policies and procedures in its Publication 52. The Postal Service can further mitigate this risk through outreach and targeted communication of these requirements. If Publication 52 is not adhered to, controlled substances may not be properly packaged for flow through the mailstream, thus increasing the safety risk for Postal Service employees. Additionally, unmarked packages containing controlled substances transported via the mailstream may increase the safety risk for Postal Service employees. As entities responsible for shipping controlled substances through the mailstream will develop their own policies and procedures, compliance with Publication 52 is still required.

Recommendation #5

The Chief Operating Officer and Executive Vice President, in coordination with the Chief Postal Inspector, develop a communication strategy to ensure approved mailers of controlled substances are aware of Postal Service Publication 52: *Hazardous, Restricted, and Perishable Mail*.

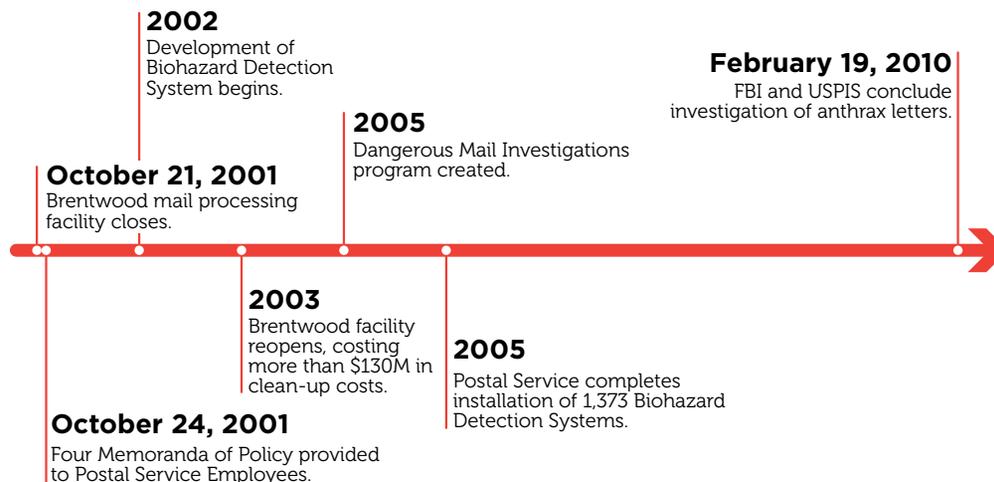
Recommendation #6

The Chief Operating Officer and Executive Vice President, in coordination with the Chief Postal Inspector, reassess the markings (on the outside of the package) requirements in Postal Service Publication 52: *Hazardous, Restricted, and Perishable Mail*, to determine if controlled substances should have specific prescribed markings.

Other Matters – Lessons Learned from the Anthrax Attacks

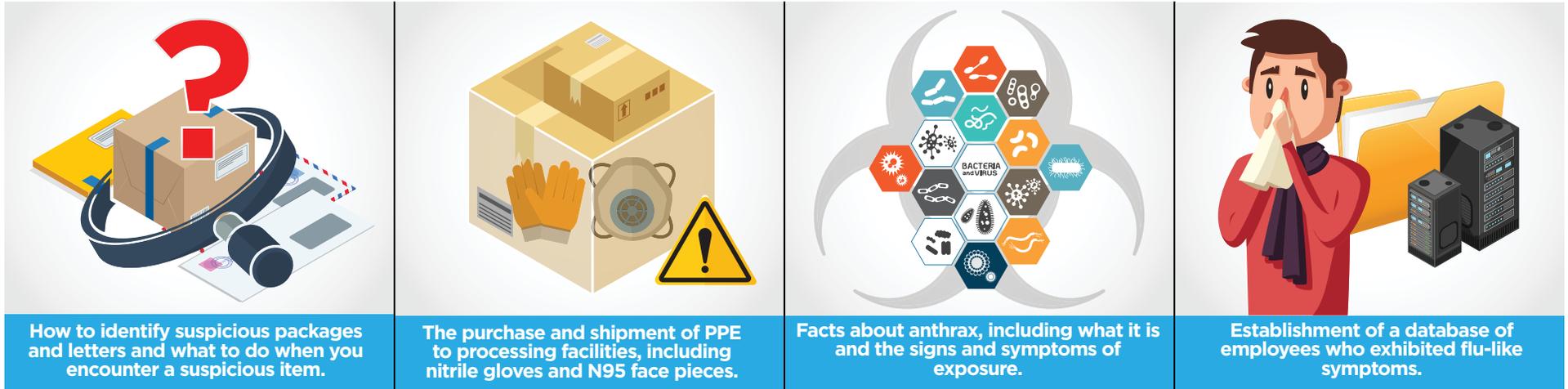
In September 2001, anonymous letters laced with deadly anthrax spores began arriving at various U.S. locations through the mail, ultimately resulting in deaths that included two Postal Service employees. The Postal Service took specific action as a result of these attacks in the areas of communication, education, policy changes, and investments in special equipment. Figure 1 provides a high-level overview of key Postal Service events related to anthrax.

Figure 1. Timeline of Events Following the 2001 Anthrax Attacks



Source: OIG analysis.

Immediately following the anthrax exposure and subsequent death of two Postal Service employees at a mail processing facility in Washington, D.C, the Postal Service issued a total of four memoranda of policy (MOP). The MOPs communicated the risks and symptoms associated with anthrax exposure and increased employee awareness of safety measures implemented to mitigate those risks. Specifically, the MOPs addressed:



In addition, Postal Service Headquarters issued a mandatory stand-up talk specifically related to anthrax. The stand-up talk explained what anthrax is, possible methods of exposure, and how to recognize a suspicious item, and detailed how supervisors and managers should respond when employees encounter suspicious mailpieces.

Furthermore, the Postal Service invested \$523 million to install Biological Detection Systems (BDS) at mail processing facilities. The BDS tests air quality and provides an early warning systems for the presence of dangerous biologicals. Since the inception of BDS, more than 7 million tests have been conducted at mail processing facilities.

Finally, as a response to the anthrax risk, the USPIS created the DMI Program. The DMI Program provides protocols designed to increase the safety of its employees when identifying and detecting suspicious substances and packages in the mailstream.

Since 2001, the policies and protocols implemented in response to the anthrax attacks have evolved and remain as guidance for today's employees. The Postal Service is leveraging these policies and protocols to address the risks associated with all suspicious mail, including synthetic opioids. Also, while BDS units are still operational at mail processing facilities, they are not a viable option for detecting synthetic opioids.

Management's Comments

Management disagreed with the overall findings, which they feel imply that the Postal Service does not have a strategic approach to addressing the risks of exposure to opioids in the mail. Management agreed with recommendation 6 and implied agreement with recommendations 3, 4, and 5 via their planned actions and target implementation dates; however, they disagreed with recommendations 1 and 2.

Regarding the findings, management stated that existing suspicious mail protocols are designed to prevent exposure to any hazardous material in the mail, regardless of source, and that those protocols prevent potential injury and illness by focusing on leaving the mail item or substance where it was found. They further stated that our assertion that specific measures have been implemented to educate and protect USPIS inspectors regarding synthetic opioids while the Postal Service has not done so for all employees ignores the fact that inspectors may open suspicious packages to determine the contents during investigation. As a result, management contends the potential risk of exposure to synthetic opioids is significantly increased for inspectors.

Management further stated that during the course of the audit they advised the OIG that PS Form 1767 was not the appropriate way for employees to respond to spills, leaks, or suspicious packages. Management reiterated that they provided the OIG with documentation showing that seven of the 18 PS Form 1767 incidents we reference in the report could not be disputed, leaving 11 incidents open for dispute.

Management stated that our report implies that management did not implement LMS training and stand-up talks in a way that ensured employees received adequate training on suspicious mail. They asserted that the Postal Service requires annual suspicious mail training for all employees, either through the Strategic Training Initiative process or documented safety talks. In addition, each facility posts information in the form of posters designed by the Inspection Service.

Regarding recommendation 1, management stated that the Postal Service has an existing robust process for identifying and responding to suspicious mail and

packages, regardless of the content. They further stated that they reinforced these protocols annually, as needed, or at the request of the Postal Inspection Service. Therefore, management disagreed that their existing protocols require additional reinforcement.

Regarding recommendation 2, management stated that the Postal Service currently has a variety of courses in LMS that address hazardous mail and other safety-related risks associated with packages — including two courses that are required as part of their existing Strategic Training Initiative. Another mandatory course will be required for all facility management personnel who deploy Narcan by June 30, 2018.

Regarding recommendation 3, management agreed to increase the annual requirement for the suspicious mail stand-up talk to twice a year, with additional distributions possible as circumstances require. Headquarters Safety personnel will issue the talk through the Safety Toolkit. The target implementation for the next suspicious mail stand-up talk is September 1, 2018.

Regarding recommendation 4, management stated that the Postal Service began an effort to deploy Narcan to about 700 locations, including major processing facilities, before the start of the audit. As part of the deployment strategy, specific communications, training regarding how to use Narcan, and information on specific dangers related to unintentional exposure to synthetic opioids has already been developed. Management stated that purchase of the product is complete and once training is documented, they will distribute Narcan. They further stated that this was a Phase 1 deployment and they anticipate further consideration of expansion. The target implementation date is September 30, 2018.

Regarding recommendation 5, management stated they will issue an announcement in seven publications reminding all HAZMAT mailers of the controlled substances mailing regulations. In subsequent correspondence, management provided a target implementation date of July 31, 2018.

Regarding recommendation 6, management stated they reassessed the external package markings requirements and determined that current Publication 52 requirements are sufficient. Management concluded that placing additional markings or identification on the external package would increase the risk of theft

and/or pilfering of such packages, which could result in potential exposure of additional employees to controlled substances and/or increase the potential risk to carriers while on their routes. Management further asserted that only mailers legally shipping controlled substances would use the new safety protocols, not those sending illegal shipments.

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

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendations 3, 4, 5, and 6 and their planned actions should resolve the issues identified; however, management's comments to recommendations 1 and 2 are nonresponsive.

With regard to management's disagreement with our overall finding that the Postal Service does not have a strategic approach to addressing the risks of exposure to opioids in the mail, the objective of our audit was to assess measures the Postal Service has implemented to prepare its workforce for the risks posed by shipments of synthetic opioids. Our results concluded that the Postal Service does not have a strategic approach and we uphold this conclusion. During audit fieldwork (October 2017 through May 2018), management did not provide any information on specific actions, taken or planned, regarding a strategic approach to addressing the risks of opioids exposure in the mail for all Postal Service employees. While management provided their plan to deploy Narcan during the exit conference (May 3, 2018), we contend this action does not constitute a strategic approach to addressing the issue, but rather should be considered an integral part of a more comprehensive strategy.

In our report, we stated that only the USPIS has taken specific measures to educate and protect inspectors regarding synthetic opioids exposure. Management's comment that we ignored the fact that inspectors are tasked with investigating suspicious packages and may open them is inaccurate. We acknowledge management's assertion that inspectors are authorized to open suspicious packages as part of their investigations, therefore could be at a higher risk of exposure. However, a mailpiece containing synthetic opioids is a potential danger to anyone involved in accepting, processing, delivering, and

receiving the mail. Additionally, there are personnel at postal facilities who are tasked with opening the mail, such as the MRC, and mail may be inadvertently damaged, exposing the contents to employees; therefore, communication to all Postal Service employees regarding the specific dangers posed by synthetic opioids could help mitigate the impact of these risks.

Regarding management's comment that they advised the OIG that using a PS Form 1767 was not the appropriate way for employees to respond to suspicious packages, we acknowledge this communication. However, as noted in our report, this form is a tool that employees can and are using to capture a hazard or unsafe practice at a postal facility — even if it is not required as part of the suspicious mail protocol. As the report concluded, there were employees who used PS Form 1767 to report incidents involving unknown powders and substances leaking from mailpieces. The report also concludes that employees are using PS Forms 1767 to document actions not compliant with suspicious mail protocols; therefore, employee awareness of exposure to unknown substances and subsequent reporting of them is relevant regardless of the mechanism used to do so. Regarding the documentation management provided related to the 18 PS Form 1767 incidents, they only provided a spreadsheet summary of follow-up they conducted but no supporting documentation to validate that these actions occurred.

Regarding management's comment that the report implies LMS training and stand-up talks were not implemented to ensure employees received adequate training on suspicious mail, this is inaccurate. The report includes 16 LMS courses identified by headquarters management, which include the two mandatory courses management referenced in their comments, and we determined that only 20 of 208 randomly selected employees had completed any of the courses during the last five years. Based on this, we concluded that employees are underusing available training and management should determine which courses should be mandatory and promote completion of them. Concerning the suspicious mail stand-up talk, our report does not conclude whether or not the suspicious mail stand-up talks were actually conducted during our audit scope of FYs 2016 and 2017. Rather, we concluded that we could not

validate that the talks were completed for all employees at all facilities for that time period due to gaps in the process for administering and tracking them.

Regarding management's disagreement with recommendation 1 to reinforce current suspicious mail protocols and issue communication specific to synthetic opioids to all employees, we believe communicating potential risks associated with opioid exposure to all employees could help mitigate the impact of these risks. Without specific communication related to synthetic opioids, employees may not be fully aware of the risks presented by, or signs of, this increasing threat. In addition, communication gaps can lead to the increased likelihood of employees not understanding and/or adhering to policy or protocols. Therefore, as recommended, management should reinforce current suspicious mail protocols and issue specific communication on synthetic opioids to all employees.

Regarding management's disagreement with recommendation 2 to identify which LMS courses should be mandatory and promote completion of them, we acknowledge there are a variety of courses in LMS that address hazardous and suspicious mail. However, only 20 of 208 selected employees had completed any of those courses during the last five years. While management stated that two of

the courses are mandatory, they did not address whether the other 14 courses they identified should be mandatory or whether they will promote completion of those courses. When employees do not follow proper protocols for handling hazardous or suspicious mail, there is an increased risk to the safety of that employee and others. Identification and promotion of relevant LMS courses would help mitigate these risks.

Regarding recommendation 6, management's meeting to reassess current Publication 52 requirements satisfies the recommendation.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations 3, 4, and 5 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 consider recommendation 6 closed with the issuance of this report. We view the disagreements on recommendations 1 and 2 as unresolved; therefore, the recommendations will remain open as we coordinate resolution with management.

Appendices

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Appendix A: Additional Information

Scope and Methodology

The scope of our audit included any existing or planned procedures, training, and communication regarding mitigation of the risk of Postal Service employee exposure to synthetic opioids, particularly fentanyl. We did not assess the effectiveness and efficiency of investigative operations of the USPIS or any other law enforcement agency to combat the shipment and trafficking of illicit synthetic opioids.

To accomplish our objective we:

- Interviewed appropriate Postal Service officials, including headquarters and USPIS officials.
- Interviewed appropriate officials from other relevant organizations, such as the Customs and Border Protection (CBP) and DEA, and obtained their existing procedures and protocols for comparison to those of the Postal Service.
- Analyzed relevant available data regarding reported cases of Postal Service employees encountering synthetic opioids.
- Observed damaged mail repackaging operations, the stock of personal protective equipment and the presence of relevant posters, and interviewed management at select Postal Service facilities in Atlanta.
- Reviewed documentation relevant to existing Postal Service procedures and training programs regarding opioid safety preparedness, including the cost and availability of opioid overdose medications.
- Reviewed applicable procedures implemented after the 2001 anthrax attack.
- Obtained the number of packages containing synthetic opioids seized by CBP and the USPIS during FY 2017.
- Interviewed applicable APWU officials regarding labor concerns associated with opioid safety.

- Extracted from the Postal Service Enterprise Data Warehouse (EDW) completion records for 16 training courses relevant to suspicious mail and unknown powders and substances procedures for FYs 2013 through 2017 to determine whether 208 randomly selected employees had completed the courses between FYs 2013 through 2017.
- Extracted from the Postal Service Safety Toolkit data from PS Forms 1767 for FYs 2016 and 2017:
 - There were 32,194 PS Forms 1767 entered into the Safety Toolkit during FYs 2016 and 2017.
 - Of the 32,194 records, we identified 313 that may have involved suspicious mail and unknown powders and substances, based on a keyword search in the Hazard Description field.
 - Of the 313, we reviewed 97³² randomly selected records to review handling of suspicious mail and unknown powders or substances.

We conducted this performance audit from October 2017 through June 2018, 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 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 May 3, 2018, and included their comments where appropriate.

We assessed the reliability of training completion records by reviewing existing information about the EDW system and comparing completion records of select courses to training records obtained by Employee Identification Number. We assessed the reliability of PS Form 1767 data by reviewing existing information

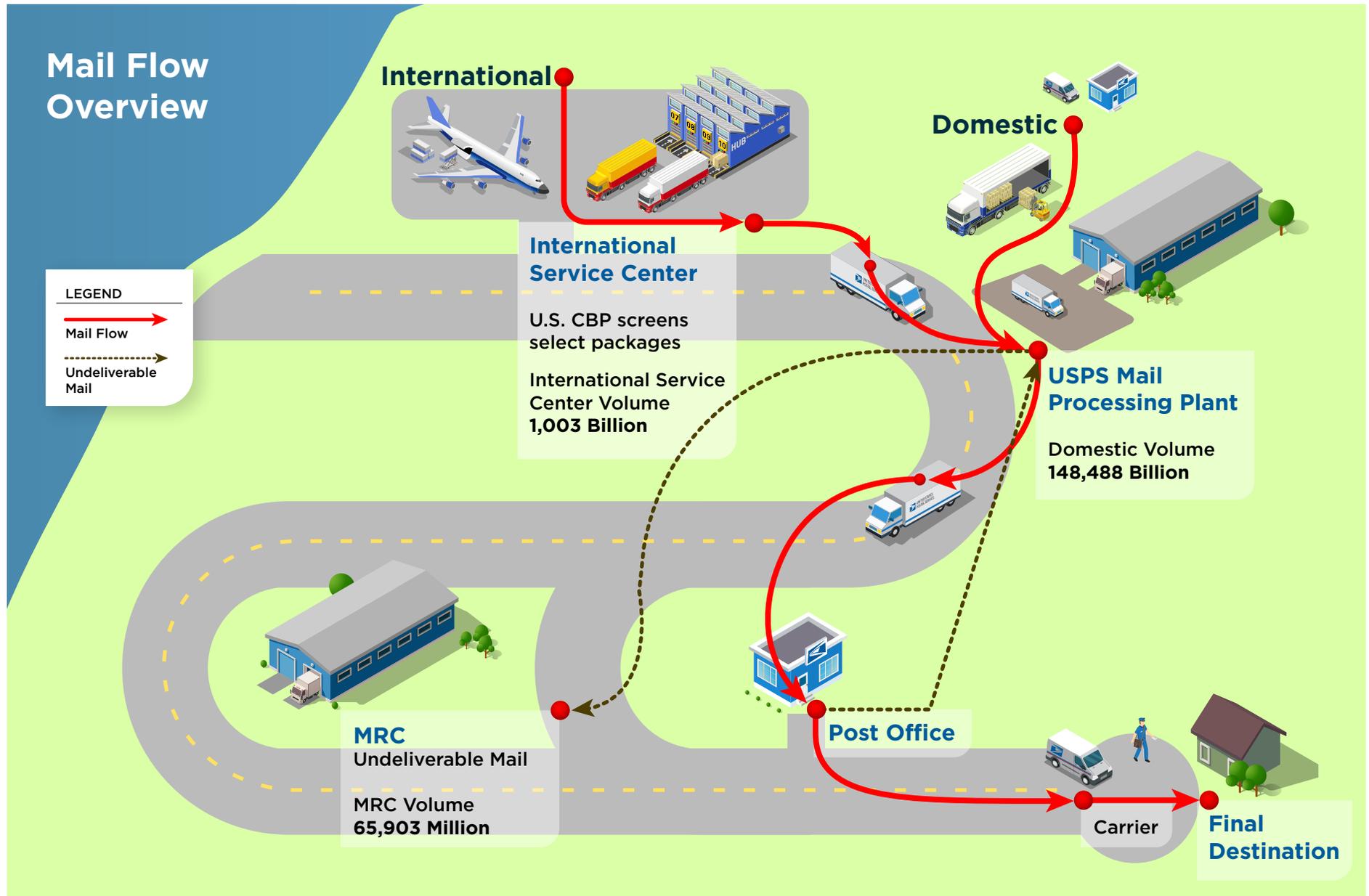
³² We randomly selected 123 of the 313 records to identify reported incidents. Twenty-six of these forms did not pertain to incidents involving suspicious mail and unknown powders or substances, so we reviewed 97 PS Forms 1767.

about the Safety Toolkit system and interviewing Postal Service officials knowledgeable about the system and the PS Form 1767 process. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Packages Suspected of Containing Marijuana</i>	Assess the Postal Inspection Service's and Postal Service's handling of packages suspected of containing marijuana.	HR-AR-17-001	10/12/2016	None

Appendix B: Mail Flow Overview



Source: OIG analysis.

Appendix C: Learning Management System Courses

Course Title	Course Number	Course Description
Anonymous Mail	10020997	An overview of Anonymous Mail and the process Sales and Services associates must use to identify, accept, and handle these items as they are encountered at the retail window.
Anonymous Mail Delivery Craft: EAS	2550101	Proper procedures for carriers to follow when accepting and collecting mail.
Anonymous Mail Plant: Craft: EAS	2550102	Proper procedures for processing employees to follow regarding anonymous mail.
Workplace Security Awareness	10022515	Awareness-level orientation of basic workplace security fundamentals and appropriate action for workers to take in the event of potential threat situations that may be encountered in the workplace, including mail tampering, biological threats, chemical threats, explosions, nuclear blasts, and radiation threats.
Suspicious Mail Awareness: Package, People	1920193	A series of three 10-minute service talks designed for supervisors to deliver to their employees.
Anonymous Mail Retail: Craft: EAS	2550103	Proper procedures for retail employees to follow regarding anonymous mail.
All Eyes on Suspicious Mail	19K0168HR19	Proper response to suspicious mail and powder spills based on decision trees issued through the <i>Suspicious Powder Spill Tabletop Exercise Guide</i> and other national guidelines.
Anonymous Mail Unit	10017233	Aviation Mail Unit employees' understanding of the Anonymous Mail Unit components and operation.
FY18: Dangerous Goods: Acceptance Personnel	10026826	Identification of dangerous goods in the mailstream as it relates to international export to comply with Federal Aviation Administration (FAA) requirements.
FY18: Dangerous Goods: Non-Acceptance Personnel	10026827	Identification of dangerous goods in the mailstream as it relates to international export to comply with FAA requirements.
Hazard Class Identification/Classification	10022980	Requirements of the International Air Transport Association's Hazardous Materials Regulations, including definitions, an introduction to the hazard classes, and the list of dangerous goods.
International Maritime Dangerous Goods (IMDG) 3: Packaging, Marking, Labeling, Placarding, and Documentation	10023288	The IMDG code is the recognized code of practice for safe carriage of dangerous goods by sea.
International Air Transport Association (IATA) 3: Packaging	10022930	Packaging requirements of the IATA's dangerous goods regulations.

Course Title	Course Number	Course Description
International Maritime Dangerous Goods (IMDG) 2: Dangerous Goods List, Special Provisions and Exceptions	10023287	The IMDG code is the recognized code of practice for safe carriage of dangerous goods by sea.
Department of Transportation (DOT) 2: Packaging, Labeling, Marking, and Placarding	10022939	Requirements of the DOT's hazardous materials regulations, including packaging, labeling, marking, and placarding.
Aviation Security Anonymous Mail Procedures and Performance Measurement	540127	Customer Service overview, processing facility audit performance, requirements and criteria.

Source: LMS.

Appendix D: Management's Comments



June 4, 2018

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Opioid Safety Awareness Report Number [HR-AR-18-DRAFT]

The Postal Service is aware of the serious risks associated with exposure to opioids, and as more fully outlined below, has taken and will continue to take important steps to address these risks. Thus, the Postal Service disagrees with the overall findings contained in this report that imply that the Postal Service does not have a strategic approach to addressing the risks of exposure to opioids in the mail. In fact, the Postal Service asserts that the allegation made in the report that the Postal Service does not have a strategic approach to address the risk of exposure to opioids in the mail is based on an incomplete audit process undertaken by the OIG and is inaccurate for the following reasons.

First, the OIG's report indicates that the Postal Service believes its existing Suspicious Mail protocols provide a safeguard for employees against all potential dangerous material in the mail. It is more than a belief. The protocols in place are designed to prevent exposure to any hazardous material contained in the mail, regardless of source. Our records indicate that these protocols prevent potential injury and illness through the focus on leaving the mail item or substance where it was found. The guidance is to not disturb or try to clean up the substance. We require that all people are cleared from the immediate area. The area is to be cordoned off and all equipment, including heating, ventilation, and air conditioning systems are to be shut down. In all instances, the facility is to contact the US Postal Inspection Service. The Inspection Service is qualified to investigate the situation and respond as appropriate according to what the investigation reveals.

Second, the OIG's report indicates that specific measures have been implemented to educate and protect US Postal Inspection Service inspectors regarding synthetic opioid exposure, but that the Postal Service has not provided specific information to all of its employees regarding the risks associated with exposure to opioids. However, this comparison ignores that Inspection Service inspectors are tasked with investigating suspicious packages and may open suspicious packages pursuant to regulations in order to determine the contents. Employees are not authorized to open packages. As a result, the potential risk of exposure to synthetic opioids is significantly increased with the Inspection Service.

Third, the OIG's report indicates that it reviewed 97 PS Form 1767s and found that 18 documented a deviation from proper procedures regarding suspicious mail. However,

during the course of this audit, the Postal Service repeatedly advised the OIG that the PS 1767 Notification of Hazard process was *not* the appropriate procedure for employees to respond to spills, leaks, or suspicious packages. Following the cautionary measures taken to clear the immediate area, the installation head will escalate as deemed necessary after conferring with the Inspection Service and higher level managers. Moreover, the Postal Service requested a list of these 18 incidents referenced and provided a response. Based on its review, the Postal Service and the Inspection Service advised the OIG and provided documentation showing that only 7 of the 18 incidents could not be disputed. However, the report was not amended to reflect this information.

Finally, the OIG's report implies that the Postal Service's Learning Management System training and stand-up talks were not implemented in a way to ensure that employees received adequate training on suspicious mail. However, the Postal Service annually requires suspicious mail training for all employees through either the Strategic Training Initiative process or through documented safety talks. In addition, each facility posts information in the form of posters designed by the Inspection Service. Indeed, as acknowledged by the OIG report, 31,198 facilities had certified completion of the suspicious mail stand-up talk subsequent to the exit conference.

The Postal Service's specific responses to the OIG report's recommendations are set forth below.

Recommendation # 1: The Chief Operating Officer and Executive Vice President, in coordination with the Chief Human Resources Officer and Executive Vice President, reinforce current suspicious mail protocols and issue communication specific to synthetic opioids to all employees.

Management Response/Action Plan:

Management disagrees with this recommendation. The United States Postal Service has an existing robust process for identifying and responding to suspicious mail and packages, regardless of the contents. These protocols are consistently reinforced on an annual basis or as needed, or at the request of the United States Postal Inspection Service. Accordingly, the Postal Service disagrees with any recommendation that our existing protocols require additional reinforcement.

Recommendation #2: The Chief Human Resources Officer and Executive Vice President identify which hazardous and suspicious mail Learning Management System courses should be mandatory, and promote completion to intended employee audiences to reinforce compliance with protocols.

Management Response/Action Plan:

Management disagrees with this recommendation. The Postal Service currently has a variety of courses available in the Learning Management System that address hazardous mail and other safety related risks associated with packages. Each year, the following mandatory courses are required as part of our existing Strategic Training Initiative (STI) process:

Course Name: FY18: Dangerous Goods: Acceptance Personnel WBT
Course Number: 10026826

Course Description:

This course focuses on the identification of Dangerous Goods in the mail stream as it relates to international export to comply with FAA requirements. The training also focuses on export monitoring to improve USPS processes for export controls. The focus is in three key areas:

acceptance scans, electronic customs manifest data collection and distribution, and package identification to meet regulations of various agencies (OFAC, BIS, Census) responsible for enforcing federal export control laws. The International Civil Aviation Organization (ICAO) requires the Postal Service to obtain certification from the Federal Aviation Administration for the international air transport of mailable dangerous goods.

Course Name: FY18: Dangerous Goods: Non-Acceptance Personnel
Course Number: 10026827

Course Description:

This course focuses on the identification of Dangerous Goods in the mail stream as it relates to international export to comply with FAA requirements. The training also focuses on export monitoring to improve USPS processes for export controls. The focus is in three key areas:

acceptance scans, electronic customs manifest data collection and distribution, and package identification to meet regulations of various agencies (OFAC, BIS, Census) responsible for enforcing federal export control laws. The International Civil Aviation Organization (ICAO) requires the Postal Service to obtain certification from the Federal Aviation Administration for the international air transport of mailable dangerous goods.

There is also a mandatory course that will be required of all management personnel in facilities that deploy NARCAN®, which is used to counteract the effects of opioid exposure pending the arrival of emergency medical personnel.

Course Name: Narcan Responder Training
Course Number: 10027028

Course Description:

The Narcan Responder Training course equips lay responders with the ability to treat employees in an unlikely opioid contamination event from damaged letters or packages. Upon completion, learners will be able to correctly identify signs of a potential opioid overdose and administer NARCAN®. This course will emphasize that use of NARCAN® is not intended to replace the need to contact 911 in these type of exposure situations.

Target Implementation Date:

June 2018

Recommendation #3: The Chief Human Resources Officer should formally document the prescribed frequency of twice per year for the Recognizing and Handling Suspicious Mail Stand-up Talk to be conducted.

Manage Management Response/Action Plan:

Suspicious Mail mandatory talks have been issued annually and at any other time requested by the US Postal Inspection Service for many years. The Postal Service agrees to increase the annual requirement to twice a year, with additional distributions possible as circumstances requires. The Suspicious Mail Stand-Up talk will be issued twice a year by Headquarters Safety through the Safety Toolkit. Documentation that the standup talk was delivered to all employees, on all tours, in all facilities completed will be entered into the safety toolkit.

As shared with the OIG, the Suspicious Mail Stand-Up talk was issued March 15, 2018, and was documented as completed in the Safety Toolkit April 10, 2018. The next Suspicious Mail Stand-Up talk is scheduled for September 1, 2018.

Target Implementation Date:

September 1, 2018, for second issue of the Recognizing and Handling Suspicious Mail mandatory Stand-Up talk.

Responsible Official:

Ms. Linda DeCarlo, Mgr. Safety & OSHA Compliance HQ

Recommendation #4: The **Chief Operating Officer and Executive Vice President, in coordination with the Chief Human Resources Officer and Executive Vice President**, should execute Narcan deployment strategy as planned, and assess whether Narcan should be deployed at additional facilities.

Management Response/Action Plan:

The Postal Service began an effort to deploy NARCAN® to approximately 700 locations, as the OIG is aware, including our major processing facilities, well before the start of this audit. As part of the deployment strategy, specific communications, training regarding how to use NARCAN®, and information regarding the specific dangers related to unintentional exposure to synthetic opioids has already been developed. As discussed, the Article 19 Process, as required by our Collective Bargaining Agreements with its unions, concluded on April 30, 2018. The purchase of the product is complete and once training is documented, the NARCAN® will be distributed. It should also be noted that in our prior discussions with the OIG regarding this deployment, the Postal Service made it clear that this was a phase 1 deployment and that further consideration of expansion was anticipated. Accordingly, the Postal Service does not believe that any further action is required at this time to address this Recommendation.

Target Implementation Date:

September 2018

Responsible Official:

Mr. Roger Collado, Mgr. Injury Compensation & Medical HQ

Recommendation #5: The **Chief Operating Officer and Executive Vice President, in coordination with the Chief Postal Inspector**, develop a communication strategy to

ensure approved mailers of controlled substances are aware of Postal Service Publication 52: *Hazardous, Restricted, and Perishable Mail*.

Management Response/Action Plan:

The USPS will issue an announcement in the following publications reminding all HAZMAT mailers of the controlled substances mailing regulations:

	Name of Publication	Responsible Business Unit	Publication Target Date
1	DMM Advisory	Product Classification	TBD
2	Industry Alert	Industry Eng & Outreach	TBD
3	Postal Bulletin	Product Classification	TBD
4	PostalPro	MEPT	TBD
5	PCC Insider	Industry Eng & Outreach	TBD
6	MTAC Advisory	Industry Eng & Outreach	TBD
7	Customer Letter	Local BMEU	TBD

Recommendation #6: The **Chief Operating Officer and Executive Vice President, in coordination with the Chief Postal Inspector**, reassess the markings (on the outside of the package) requirements in Postal Service Publication 52: *Hazardous, Restricted, and Perishable Mail*, to determine if controlled substances should have specific prescribed markings

Management Response/Action Plan:

The Chief Postal Inspector in consultation with the Chief Operating Officer and Executive Vice President reassessed the external package markings requirements. Pursuant to a May 30, 2018 meeting regarding this recommendation, which included Criminal Investigations Group, Security Group, and the Prohibited Mail/Narcotics Team, management determined the current Publication 52 requirements are sufficient. Publication 52 prescribes safety precautions which require controlled substances be contained in a marked and sealed inner package (section 453.4.a). Management concluded placing additional markings or identification on the external package would increase the risk of theft and/or pilfering of such packages, which could result in potential exposure of the controlled substances to additional employees internally and/or increase the potential risk to our carriers while on their routes. Additionally, management determined new safety protocols would only be used by mailers legally shipping controlled substances, not those sending illegal shipments.



Guy J. Cottrell
Chief Postal Inspector



David E. Williams, Jr.
Chief Operating Officer and Executive Vice President



Jeffrey C. Williamson
Chief Human Resources Officer and Executive Vice President

cc: Manager, Corporate Audit Response Management



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