



Office of Inspector General | United States Postal Service

Audit Report

Postal Service Accident Safety Policies and Procedures - Great Lakes Area

Report Number HR-AR-18-010 | September 17, 2018



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Highlights

Objective

Our objective was to determine whether the U.S. Postal Service adhered to safety policies and procedures related to accidents in the Great Lakes Area.

The Postal Service's accident frequency rate measures the estimated annual accident frequency per 100 employees. During fiscal years (FY) 2016 and 2017, the Great Lakes Area had the highest average accident frequency rate of all seven Postal Service areas. Their average accident frequency rate of 17.9 exceeded both the organization's goal of 15 and the national average of 15.7.

“During fiscal years (FY) 2016 and 2017, the Great Lakes Area had the highest average accident frequency rate of all seven Postal Service areas.”

The Postal Service categorizes accidents by serious and general. A serious accident results in death, inpatient hospitalization, property damage exceeding \$100,000, amputation, or loss of vision; whereas, a general accident is all other accidents that do not meet the serious accident criteria.

We visited 14 facilities in the Great Lakes Area, and reviewed all 26,051 accidents, including all 95 serious accidents for FYs 2016 and 2017.

We also reviewed employee participation in the Counseling At Risk Employees (CARE) program, which was established to engage employees in accident prevention using accident statistics, root cause analyses, and action plans.

What the OIG Found

The Great Lakes Area did not consistently adhere to safety compliance and reporting requirements related to accidents. Specifically:

- Thirty-five percent (33 of 95) of all serious accident investigative reports were not completed within the 15-day requirement, incomplete, or not completed at all.
- Sixty-nine percent (11,618 of 16,913) of all eligible employees were not identified to participate in the mandatory CARE program.
- Thirty-eight percent (10,021 of 26,051) of total accidents did not have an Occupational Safety and Health Administration (OSHA) Form 301, Injury and Illness Incident Report, created in the Employee Health and Safety system within 24 hours.

Additionally, of the fourteen facilities we visited:

- Twenty-nine percent (four of 14) did not post OSHA Form 300A, Summary of Work-Related Injuries and Illnesses as required. Facility management took corrective action by displaying the form in a visible location on the workroom floor.
- Fourteen percent (two of 14) did not retain OSHA Forms 300, Log of Work-Related Injuries and Illnesses as required.

These issues occurred because the current serious accident review reporting process does not include oversight from the area regarding timeliness compliance. In addition, the Postal Service Headquarters Safety and OSHA Compliance Office is not ensuring the CARE Tracking Tool system is updated to reflect eligible CARE program participants. Lastly, facility managers are not taking advantage of available OSHA recordkeeping training.

As a result, the Great Lakes Area is not fully meeting serious accident investigative reporting requirements, which may lead to information not being available or visible for identifying accident root causes; existing safety measures may not be adequately assessed for effectiveness; eligible employees are not participating in the CARE program; and noncompliance of recordkeeping requirements could lead to OSHA citations and penalties.

What the OIG Recommended

We recommended management incorporate an area oversight mechanism in the review process to promote transparency in the timeliness of report completion and include additional comprehensive data in the Human Resources Safety Dashboard related to serious accident reporting timeliness and causality of accidents.

We also recommended management ensure eligible employees are included in the CARE program by reconciling employee data, and assess available OSHA safety and health training regarding safety recordkeeping practices to provide applicable refresher training to facility managers in the Great Lakes Area.

Transmittal Letter



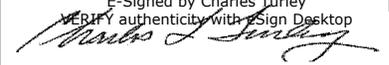
OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

September 17, 2018

MEMORANDUM FOR: SIMON M. STOREY
VICE PRESIDENT, EMPLOYEE RESOURCE
MANAGEMENT

ERICA A. BRIX
VICE PRESIDENT (A), AREA OPERATIONS -
GREAT LAKES AREA

E-Signed by Charles Turley
VERIFY authenticity with Sign Desktop



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

SUBJECT: Audit Report – Postal Service Accident Safety Policies
and Procedures – Great Lakes Area
(Report Number HR-AR-18-010)

This report presents the results of our audit of the Postal Service Accident Safety Policies and Procedures – Great Lakes Area (Project Number 18SMG014HR000).

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 & 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 self-initiated audit of the U.S. Postal Service's Safety Procedures in the Great Lakes Area (Project Number 18SMG014HR000). Our objective was to determine whether the Postal Service adhered to safety policies and procedures related to accidents in the Great Lakes Area.

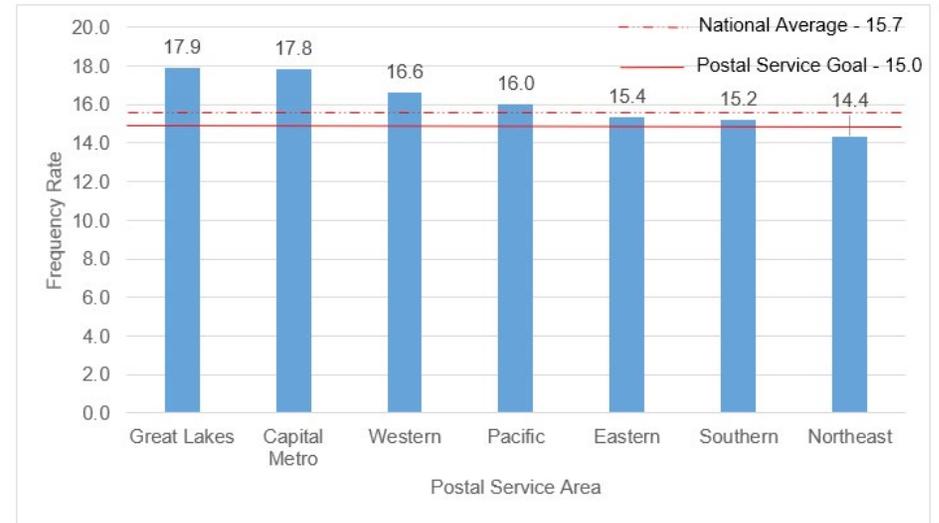
To accomplish our objective, we reviewed all 26,051 accidents, including all 95 serious accidents, in the Great Lakes Area for fiscal years (FY) 2016 and 2017. In addition, we visited 14 facilities in the area — two sites in each of the area's seven districts.

Background

The Postal Service's accident frequency rate measures the estimated annual accident frequency per 100 employees. During FYs 2016 and 2017, the Great Lakes Area had the highest average accident frequency rate of all seven Postal Service areas. Its average accident frequency rate of 17.9 exceeded both the organization's goal of 15 and the national average of 15.7 (see Figure 1).

“The Postal Service's accident frequency rate measures the estimated annual accident frequency per 100 employees.”

Figure 1: Average Accident Frequency Rate by Postal Service Area FYs 2016 - 2017

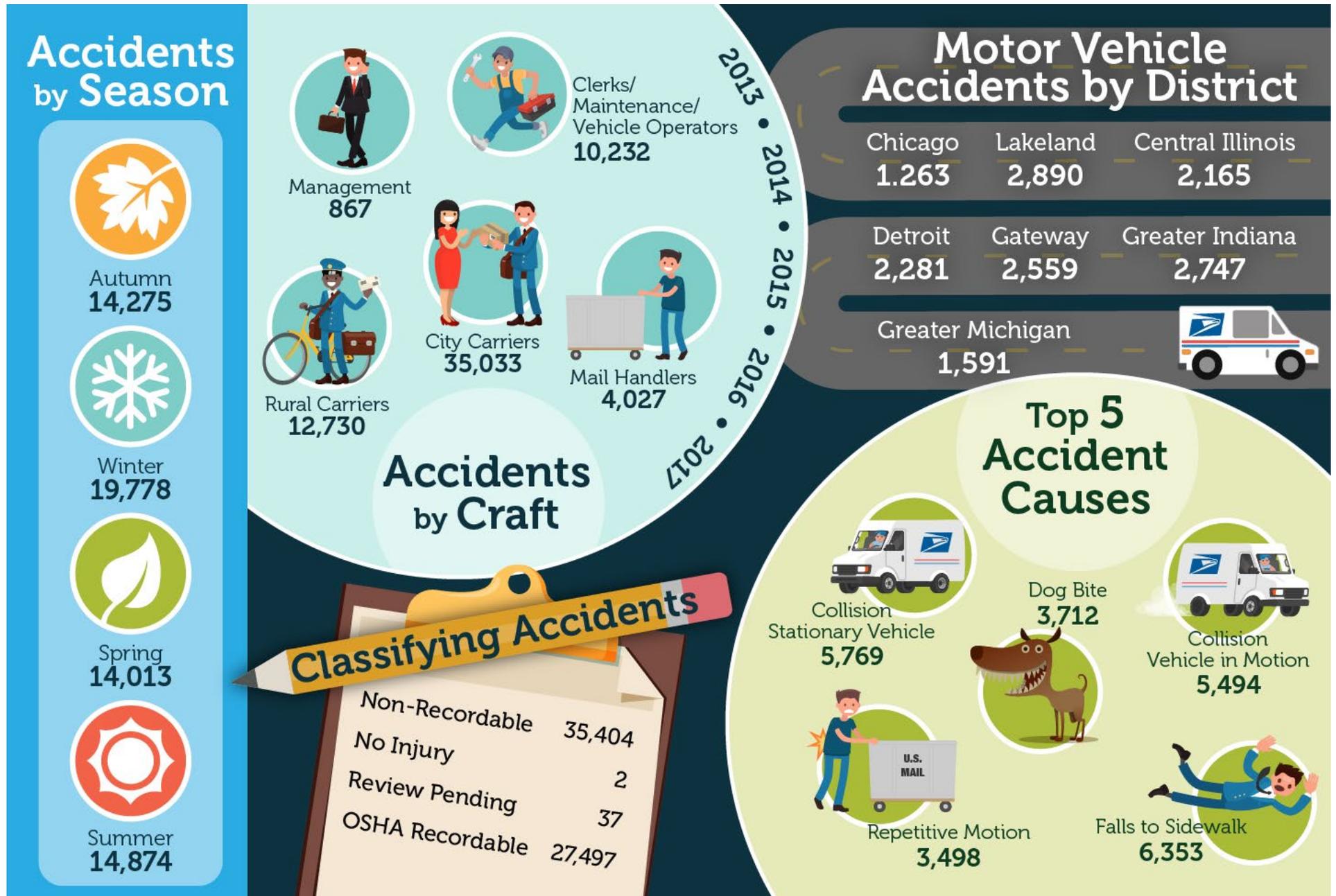


Source: National Performance Assessment corporate accident data obtained from the Enterprise Data Warehouse (EDW).

Great Lakes Area Accident Statistics

From FYs 2013 through 2017, the Great Lakes Area had a total of 62,940 accidents involving 39,049 employees. For additional information on Great Lakes Area accidents during this period see [Figure 2](#).

Figure 2: Great Lakes Area Accidents Infographic, FYs 2013 - 2017



Source: EDW.

- Thirty-one percent of accidents occurred during the winter season.
- Fifty-six percent of accidents occurred among the city carriers craft.
- Ten percent of accidents were caused by falls to the sidewalk.
- Forty-four percent of accidents were OSHA recordable.

In 1998 as a result of the Postal Employees Safety Enhancement Act, the Postal Service, consistent with most private sector employers in the U.S. became fully subject to the Occupational Safety and Health Act of 1970. Accordingly, the Occupational Safety and Health Administration (OSHA) has jurisdiction over the Postal Service in matters relating to employee safety and health and the Postal Service must comply with the OSHA Act and OSHA standards and regulations. If a violation occurs, the Postal Service may be cited, fined, and in extreme cases, referred for criminal prosecution by OSHA. During FYs 2016 and 2017, OSHA levied fines totaling \$397,858 against the Great Lakes Area for violations such as hazardous conditions and accident recordkeeping; however, the Postal Service’s actual payments totaled \$74,336 after abatements.

Finding #1: Serious Accidents Investigative Reporting

Of the 95 serious accidents¹ in the Great Lakes Area for FYs 2016 and 2017, 35 percent (or 33) of the serious accident investigative reports² were late, incomplete, or not completed at all (see Table 1). Specifically, for the 33 exceptions:

- Twenty-six reports (or 27 percent) were not completed within the prescribed 15-day requirement.³
- Five reports (or 5 percent) were not completed at all.⁴

“Twenty-six reports (or 27 percent) were not completed within the prescribed 15-day requirement.”

1 Occupational accident, illness, or disease resulting in death, inpatient hospitalization, property damage exceeding \$100,000, amputation, or loss of vision.
 2 A report prepared by a Postal Service management board that identifies root causes of accidents and contains recommendations to prevent accident recurrence.
 3 Employee Labor Manual (ELM), Issue 43, Section 822.225.
 4 ELM, Issue 43, Section 822.221.

- Two reports (or 2 percent) were incomplete, missing key dates to determine if the report was completed within the requirement.

Table 1: Serious Accident Investigative Report Analysis

	FY 2016	FY 2017	Total
Late Investigative Reports	15	11	26
No Investigative Reports	5	0	5
Incomplete Investigative Reports	1	1	2
Total	21	12	33

Source: Safety Toolkit system.

The Great Lakes Area uses the Human Resources Safety Dashboard, which is generated by headquarters, to track accidents and provide weekly scorecards to their districts. This dashboard provides combined data for general accidents and serious accidents, but does not segregate this data accordingly. As headquarters monitors serious accident investigative reports that are late, the area does not have visibility, via the dashboard, to this data.

Management did not complete serious accident investigative reports at all or did not complete them timely because the current serious accident review reporting process does not include oversight from the area regarding timeliness compliance. As such, area Human Resources management communicated during interviews that they were unaware of the total number of serious accidents that occurred in the area during FYs 2016 and 2017.

By not including area management in the serious accident review reporting process, the area is not fully meeting the prescribed serious accident investigative reporting requirements. When serious accident investigative reports are not completed timely, information may not be available or visible to identify accident

root causes and existing safety measures may not be adequately assessed for effectiveness. This could potentially impact the Postal Service's ability to implement preventive or mitigating actions regarding potential future accidents.

Recommendation #1

The **Acting Vice President, Area Operations, Great Lakes Area**, incorporate an area oversight mechanism in the review process to promote compliance and transparency in the timeliness of serious accident investigative report completion.

Recommendation #2

The **Vice President, Employee Resource Management**, in coordination with the **Acting Vice President, Area Operations, Great Lakes Area**, include additional data in the Human Resources Safety Dashboard related to serious accident reporting timeliness, and causality of accidents.

Finding #2: Counseling at Risk Employees

Employees were not identified for participation in the mandatory Counseling At Risk Employees (CARE) program in the Great Lakes Area. Of the 16,913⁵ eligible employees, 69 percent (or 11,618) did not participate in the program. Specifically, we identified employees involved in recent accidents who were not included in the program, and employees with less than two years of service who were not included until after an accident occurred.

The CARE program was established in FY 2016 to engage employees in accident prevention using accident statistics, root cause analyses, and action plans. The CARE team will meet quarterly for employees with two or less years of service and employees with recent accidents and/or a history of having one or more accidents (avoidable or not) in the past two years.⁶

⁵ We removed employees who no longer work for the Postal Service.

⁶ *Counseling At Risk Employees*, Section C, November 2015.

⁷ ELM, Issue 43, Section 821.121a.

Employees are not participating in the CARE program as required because Postal Service Headquarters Safety and OSHA Compliance Office is not ensuring the CARE Tracking Tool system is updated to reflect eligible CARE program participants. As such, facility managers are not aware of which employees are required to participate in the program.

When eligible employees do not participate in the CARE program, those employees will not be engaged in this accident prevention avenue, potentially reducing the number of accidents.

Recommendation #3

The **Vice President, Employee Resource Management**, ensure the Counseling At Risk Employees Tracking Tool system includes all eligible employees by conducting periodic reconciliations of employees who meet the program participation criteria with employees who participated in the program.

Finding #3: Accident Reporting Compliance

The Great Lakes Area did not consistently comply with Postal Service requirements for OSHA-related accident reporting. Specifically, of the 26,051 accidents, 38 percent (or 10,021) did not have an OSHA Form 301, Injury and Illness Incident Report, created in the Employee Health and Safety (EHS) system within 24 hours, as required.⁷

“The Great Lakes Area did not consistently comply with Postal Service requirements for OSHA-related accident reporting.”

In addition to the OSHA Form 301 review, we visited 14 facilities to assess whether each facility maintained required OSHA forms and determined that:

- Twenty-nine percent (four of 14) did not have the required OSHA Form 300A, Summary of Work-Related Injuries and Illnesses, posted.⁸
- Fourteen percent (two of 14) did not adequately retain OSHA Forms 300, Log of Work-Related Injuries and Illnesses.⁹

Facility supervisors may not be creating OSHA Forms 301 in EHS within the prescribed time, or maintaining required OSHA forms due to training. During interviews, management communicated that additional training for both supervisors and acting 204b supervisors related to safety recordkeeping requirements/practices could be beneficial in helping meeting compliance. Although not comprehensive, we identified several Learning Management System¹⁰ courses related to general OSHA awareness and recordkeeping. Although not mandatory, there was a low supervisor¹¹ participation rate for FYs 2016 and 2017 for these courses (see Table 2).

Table 2: Safety Training - Supervisor Participation FYs 2016 - 2017

Training Course	Participants	Percentage of Supervisors Participating ¹²
300 Recordkeeping (#10021643)	45	1.00%
OSHA Safety Awareness (#10013759)	16	.35%
OSHA Safety (#10003394)	4	.09%
OSHA Recordkeeping (#10001301)	3	.07%
OSHA General Safety Talks (#10012021)	3	.07%
OSHA Compliance (#10009136)	1	.02%

Source: EDW.

⁸ ELM, Issue 43, Section 821.142.

⁹ ELM, Issue 43, Section 821.141.

¹⁰ A system that allows employees access to on-line training courses.

¹¹ As of September 29, 2017, the Great Lakes Area employed about 4,578 supervisors. This total does not include acting supervisors (204b) because EDW does not specifically identify them in the system.

¹² This percentage does not include acting supervisors (204b).

By not creating an OSHA Form 301 in EHS within 24 hours, or maintaining OSHA Forms 300A and 300, management is not in compliance with the policy; therefore, not meeting the intent of timely and accurate recordkeeping practices. These recordkeeping deficiencies could misrepresent the actual number of accidents, which could impact reporting and management decision-making regarding safety programs. In addition, noncompliance with accident reporting requirements could result in recordkeeping violations, citations, and penalties from OSHA.

Facility management at the four facilities that did not have OSHA Form 300A posted took corrective action by displaying the form in a visible location on the workroom floor. Therefore, we are not making any recommendation regarding this matter.

Recommendation #4

The **Acting Vice President, Area Operations, Great Lakes Area**, should assess the available Occupational Safety and Health Administration safety and health training available regarding safety recordkeeping practices and provide applicable refresher training to facility managers in the Great Lakes Area.

Management's Comments

Management agreed in part with recommendations 1 and 2; however, did not agree with recommendations 3 and 4. Management did not explicitly state agreement or disagreement with the findings.

Regarding recommendation 1, management agreed in part that Serious Accident Reporting (SAR) and the investigative processes were not completed within 15 working days as stated in policy. Management indicated that in some instances, especially involving fatalities, police, autopsy, and toxicology issues, other pertinent documentation is not readily available within the 15-day time

period. Without the necessary documents, the Serious Accident Review Board is unable to objectively review the evidence and render sound recommendations. Moving forward, area oversight will be provided through a process that monitors serious accidents from point of notification to submission of the Serious Accident Review Board recommendations. Area management will use the SAR status report and SAR Missing Required Information report in the safety toolkit to track and follow-up with districts for compliance. This will be conducted on a weekly basis. The target implementation date is September 17, 2018.

Regarding recommendation 2, management intends to modify a different system to comply with the recommendation. The headquarters Safety Office will arrange to enhance the existing SAR module within the Safety Toolkit. This module already gathers all the required data needed to notify OSHA of qualifying serious accidents. The vendor who supports the safety toolkit will complete the enhancements before the end of FY 2018. Management will update the current user guide for the SAR module to include information on the new functionality and give a demonstration to all district and area safety managers. The target implementation date is October 31, 2018.

Regarding recommendation 3, management disagreed stating the CARE Tracking Tool is populated with data from the EDW after the end of each quarter and loaded into the CARE application. Data pulled from the EDW include employees having been with the Postal Service for less than two years and employees involved in more than one accident in the last two years. Users also have the option of adding employees to the CARE data. As such the data is reconciled every quarter.

Regarding recommendation 4, management did not agree that each facility does not adequately maintain OSHA Forms 300 and 300A. OSHA Forms 300A are stored electronically in EHS. Each facility has the ability to extract the OSHA Forms 300 and 300A when required and can do so within the four-hour OSHA requirement. However, management agreed that a percentage of accidents are not being entered into EHS within the required 24 hours. Management also agreed that supervisors and 204b supervisors could benefit from refresher training; however, the Learning Management System is currently evolving into a new system so management is unable to determine which course(s) will be

available after this transition. Once the Postal Service fully implements the new system, management will assess the available courses and launch a training initiative for supervisors and 204b supervisors in each district. Training is to be completed in FY 2019.

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

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendations 1, 2, and 4, and planned actions should resolve the issues identified in the report; however, we consider management's comments regarding recommendation 3 to be unresponsive.

Regarding management's disagreement with recommendation 3, as indicated in the report, we identified that not all eligible employees were included in the CARE program. Of the eligible employees, including employees involved in recent accidents and employees with fewer than two years of service, 69 percent did not participate in the program.

Regarding management's disagreement with recommendation 4, we acknowledge that OSHA Forms 300A are stored electronically in EHS; however, policy also requires the forms to be posted in a conspicuous place at every establishment where employees work or report to work during February 1 through April 30 each year. We identified 29 percent of facilities (four of 14) that did not have the form posted. Additionally, two facilities did not provide OSHA Form 300, which must also be maintained at each facility. While management disagreed with recommendation 4, their intended action to launch a training initiative for supervisors and 204b supervisors satisfies the intent of the recommendation.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations 1, 2, and 4 should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed. We view the disagreement on recommendation 3 as unresolved; therefore, the recommendation will remain open as we coordinate resolution with management.

Appendices

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Appendix A: Additional Information

Scope and Methodology

We decided to assess the Great Lakes Area due to it having the highest average accident frequency rate during FYs 2016 and 2017. We reviewed 26,051 accidents, including all 95 serious accidents. In addition, we visited 14 facilities in the Great Lakes Area, which included 409 of the total accidents.

To accomplish our objective, we:

- Conducted site visits at two facilities in each district in the Great Lakes Area and:¹³
 - Obtained OSHA Forms 300 and 300A at facilities visited for calendar years 2016 through 2017 to ensure OSHA compliance.
 - Obtained OSHA Forms 301 at facilities visited for FYs 2016 through 2017 to ensure OSHA compliance.
 - Determined if the Postal Service conducted safety inspections at the facilities visited (as required) and documented safety findings in the appropriate system.
 - Identified hazardous conditions at the facilities that could lead to injury or illness.
 - Interviewed Postal Service officials responsible for recording and reporting OSHA injury and illness data into EHS.
- Obtained and analyzed EDW and Safety Toolkit system accident data to identify potential issues or trends.

- Obtained and analyzed Enterprise Resource Management system data to identify the number of continuation of pay hours used when serious accidents occurred.
- Met with Postal Service Headquarters personnel to discuss potential issues with systems used to track safety training and oversight.
- Compared CARE program data with EDW data to identify which employees with accidents were included in the CARE program.

We conducted this performance audit from February through September 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on August 6, 2018, and included their comments where appropriate.

We assessed the reliability of EDW data by validating accident log data against the incident log data obtained from EHS. We randomly selected twenty employees in EDW and traced the data to individual OSHA Forms 301. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

The OIG did not identify any prior audits or reviews related to the objective of this audit issued during the last five years.

¹³ Chicago Central Annex, Robert Leflore Station, Lombard Post Office, Dundee Post Office, Jennings Branch, Washington Post Office, Zionsville Post Office, Speedway Branch, Rockford Post Office, Greenville Post Office, Novi Post Office, Saline Post Office, Mount Prospect Post Office, and West Allis Branch.

Appendix B: Management's Comments



August 31, 2018

RICK POLAND
A/DIRECTOR, AUDIT OPERATIONS

SUBJECT: Postal Service Accident Safety Policies and Procedures – Great
Lakes Area (Report Number [HR-AR-18-DRAFT])

Management agrees in part with Recommendation #1, agrees with
Recommendation #2, however, does not agree with Recommendation #3 or #4.
Our disagreements are outlined in each Recommendation response below.

Recommendation [#1]:

"The Vice President, Area Operations, Great Lakes Area, incorporate an area oversight mechanism in the review process to promote compliance and transparency in the timeliness of serious accident investigative report completion."

Management Response/Action Plan:

The Great Lakes Area, agrees in part that Serious Accident Reporting (SAR), and the investigative processes were not completed within 15 working days as stated in ELM 820. However, in some instances; especially with fatalities, police, autopsy, toxicology, and other pertinent documentation is not readily available within the 15 day time period. Without the necessary documents the Serious Accident Review Board is unable to objectively review the evidence and render sound recommendations. However the Great Lakes Area recognizes the need for compliance, transparency and timeliness in serious accident investigation and completion. Moving forward Area oversight will be provided by building a process to monitor serious accidents from the point of notification to the submission of the Serious Accident Review Boards Recommendations. Area will use the SAR Status Report, and SAR Missing Required Information report in the STK to track and follow-up with districts for compliance. This will be conducted on a weekly basis.

Target Implementation Date:

September 17, 2018

Responsible Official:

Area Manager, Human Resources

Recommendation [#2]:

"The Vice President, Employee Resource Management, in coordination with the Vice President, Area Operations, Great Lakes Area, include additional data in the Human Resources Safety Dashboard related to serious accident reporting timeliness, and causality of accidents."

Management Response/Action Plan:

Management agrees with the recommendation; however intends to modify a different system to comply. The Human Resources Safety Dashboard does not contain specific information regarding Serious Accidents. It is intended as a high level view of all accidents and top causes. To comply with the recommendation of the OIG, Headquarters Safety will arrange to enhance the existing Serious Accident Reporting module within the Safety Toolkit. This module already gathers all the required data needed to notify OSHA of qualifying Serious Accidents. The vendor who supports the Safety Toolkit has been asked to provide the following fields:

- Time of day that the managing official was notified of the event;
- Time of day that OSHA was notified of the event;
- Check box to indicate that the office is awaiting documentation from another agency or entity; and
- Date the Board findings were presented to the District Manager, Area Vice President and Installation Head;

The vendor will complete the enhancements before the end of FY 18 with a planned rollout within the first Quarter of FY 19 where it will be available to all field staff. The current user guide for the Serious Accident Report Module will be updated to include information on the new functionality and a demonstration will be shown to all District and Area Safety Managers.

Target Implementation Date:

October 31, 2018

Responsible Official:

Manager, Safety & OSHA Compliance, HQ

Recommendation [#3]:

The Vice President, Employee Resource Management, ensure the Counseling At Risk Employees Tracking Tool system includes all eligible employees by conducting periodic reconciliations of employees who meet the program participation criteria with employees who participated in the program.”

Management Response/Action Plan:

Management disagrees with this recommendation. The Counseling At Risk Employee Tracking Tool is populated with data from EDW (Teradata) after the end of each quarter and loaded into the CARE application. The current quarter’s data is archived in a table in the CARE database. The data pulled from Teradata includes employees with the Postal Service for less than 2 years and employees with more than one accident in the last two years. User’s also have the option to add employees to the CARE data for the current quarter as Employees with Less Than 2 Years, Employees with Deficiencies or Accident Repeaters. As such the data is reconciled every quarter. In addition, reports are available at any time for the field users to document compliance and for field safety or operations personnel to audit discussion dates and high level content.

Target Implementation Date:

N/A

Responsible Official:

N/A

Recommendation [#4]:

“The Vice President, Area Operations, Great Lakes Area, should assess the available Occupational Safety and Health Administration safety and health training available regarding safety recordkeeping practices and provide applicable refresher training to facility manager in the Great Lakes Area.”

Management Response/Action Plan:

The Great Lakes Area does not agree that OSHA 300 and 300As are not adequately maintained in each facility. OSHA 300 and OSHA 300A are stored electronically in EHS. This electronic management system was specifically put in place to ensure copies are maintained and readily available in each unit. Upon request OSHA provides a 4 hour timeframe to provide OSHA 300 and 300A. Each facility has the ability to extract the OSHA 300 and 300A when required and within

- 4 -

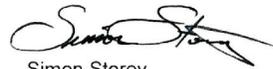
the 4 hour OSHA requirement. However, The Great Lakes Area does agree that a percentage of accidents are not being entered in EHS within 24 hours as required. The Great Lakes Area also agrees that supervisors and 204b supervisors could benefit from refresher training. Unfortunately the Learning Management System (LMS) is currently evolving into a new system called HERO. At this time we are unable to determine which course(s) will be available after this transition. Once HERO is fully implemented the Great Lakes Area will assess the available courses and launch a training initiative for supervisors and 204b supervisors in each district. Training is to be completed in FY 19.

Target Implementation Date:

To Be Determined based on release of safety recordkeeping courses available in HERO.

Responsible Official:

Area Manager, Human Resources



Simon Storey
Vice President
Employee Resource Management



Erica A. Brix
Vice President
Great Lakes Area



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