



OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Facility Condition Reviews – Northeast Area

Audit Report

Report Number
SM-AR-17-001

November 9, 2016

Post Office





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UNITED STATES POSTAL SERVICE

Highlights

***Twenty-three (74 percent)
retail facilities had potential
OSHA violations***

Background

The U.S. Postal Service has more than 30,000 leased and owned retail facilities nationwide. About 3,851 of these facilities are in the Northeast Area. The Post Office lobby is the principal business office of the Postal Service. The lobby's appearance directly affects the Postal Service's image because it is the only close-up view of postal operations for many customers. The Postal Service must maintain a safe environment for employees and customers and follow safety laws set forth by the Occupational Safety and Health Administration (OSHA).

Our objective was to determine if Postal Service management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities. We reviewed 31 facilities in the Northeast Area and assessed items related to building safety, security, appearance, customer complaints, workplace environment, and workplace violence. We also assessed whether each facility was handicap accessible.

This is the third in a series of audits assessing retail facility conditions nationwide.

What The OIG Found

The Postal Service must improve adherence to building maintenance, safety and security standards, and employee working condition requirements at its retail facilities. We reviewed 31 facilities and found:

- Sixteen (52 percent) had building safety and security issues;
- Seventeen (55 percent) had building maintenance issues;
- Twenty-four (77 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved;
- Twenty-nine (94 percent) did not display workplace environment posters, such as those that inform employees what to do when injured at work;
- Sixteen (52 percent) did not display workplace violence posters, such as *Zero Tolerance Policy and Reporting Procedures*;
- Twenty-three (74 percent) had potential OSHA violations related to building safety and security; and
- One (3 percent) did not provide handicap accessibility.

Conditions related to building safety, security, and maintenance occurred because of competing priorities and local management's failure to focus on cleaning and general maintenance and repairs. In addition, employees of one district office did not use a safety checklist as required and no district office conducted facility security checks. Management did not address other deficiencies due to budget constraints or the lessor's refusal to perform requested repairs.



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Based on potentially finable OSHA violations found at statistically sampled facilities, we estimated the monetary value of these violations at retail facilities across the Northeast Area would be \$10.6 million.

Attention to these areas will reduce the Postal Service's exposure to OSHA fines and penalties; poor employee morale and increased turnover; risk of injuries to customers and employees; and related costs such as workers' compensation claims, loss of work and productivity, and lawsuits. Poorly maintained and unappealing lobbies can also reduce brand loyalty, which impacts revenue.

Local management began taking corrective action by immediately addressing certain deficiencies brought to their attention during site visits, such as displaying missing posters, unblocking exits, and securing unlocked vehicles.

What The OIG Recommended

We recommended management develop an action plan to address all building maintenance, safety, security, workplace environment, and workplace violence policy issues identified during our audit; and provide training to improve building maintenance, housekeeping, safety and security standards, management of local customer complaints, and the display of required posters.

In previous reports on facility conditions in the Capital Metro and Great Lakes areas, we recommended management develop a process to improve coordination among Facilities personnel, managers, and lessors to timely resolve repair issues; reassess the safety inspection process to include an assessment of facility security, repair, and cleanliness issues; and enforce the requirement to have facility personnel perform housekeeping inspections. Therefore, we are not making recommendations to address these issues in this report.

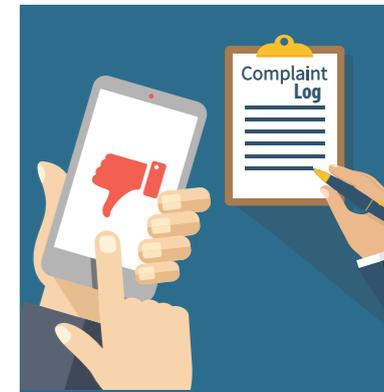
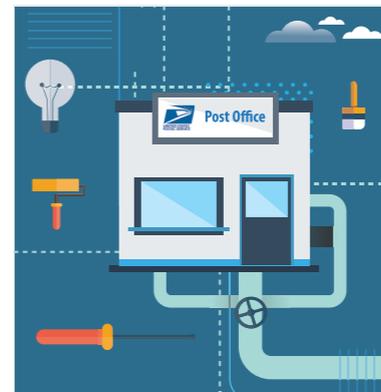


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We Reviewed
31 Facilities
And Found:

[CLICK THE ICONS](#) ▶



Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

November 9, 2016

MEMORANDUM FOR: EDWARD PHELAN, JR.
VICE PRESIDENT, NORTHEAST AREA

TOM A. SAMRA
VICE PRESIDENT, FACILITIES

NANCY L. RETTINHOUSE
VICE PRESIDENT, EMPLOYEE RESOURCE MANAGEMENT

E-Signed by Charles Turley 
VERIFY authenticity with eSign Desktop

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

SUBJECT: Audit Report – Facility Condition Reviews – Northeast Area
(Report Number SM-AR-17-001)

This report presents the results of Facility Condition Reviews – Northeast Area
(Project Number 16SMG001SM000).

We appreciate the cooperation and courtesies provided by your staff. If you have any
questions or need additional information, please contact Keshia L. Trafton, director,
Supply Management and Facilities, or me at 703-248-2100.

Attachment

cc: Corporate Audit and Response Management

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Findings

The Post Office lobby is the principal business office of the Postal Service and is the only close-up view of postal operations for most customers. Therefore, its appearance directly affects the Postal Service's public image. The Postal Service must maintain a safe environment for both employees and customers.

Introduction

This report presents the results of our self-initiated audit of facility condition reviews in the Northeast Area (Project Number 16SMG001SM000). Our objective was to determine if U.S. Postal Service management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities. See [Appendix A](#) for additional information about this audit.

The Post Office lobby is the principal business office of the Postal Service and is the only close-up view of postal operations for most customers. Therefore, its appearance directly affects the Postal Service's public image. The Postal Service must maintain a safe environment for both employees and customers. It must also follow federal safety laws set forth by the Occupational Safety and Health Administration (OSHA). The Postal Service also follows general policies and procedures regarding safety and security and the appearance of lobbies and facilities. As of May 2016, it had more than 30,000 leased and owned retail facilities nationwide, 3,851 of which are in the Northeast Area.

In September 2015, the U.S. Postal Service Office of Inspector General (OIG) reported on poor working conditions at a Post Office in New Mexico.¹ As a result of the unacceptable conditions found at this office, the OIG is conducting a national series of audits that focus on conditions related to building appearance; safety and security; customer complaints; workplace environment and violence; and handicap accessibility. As part of this audit – the third in the series – we visited 23 statistically sampled and eight judgmentally selected facilities.²

Summary

The Postal Service must improve adherence to building maintenance, safety and security standards, and employee working condition requirements at retail facilities. During our facility reviews, we found the following conditions:³

- Sixteen facilities (52 percent) had building security and safety issues;
- Seventeen facilities (55 percent) had building maintenance issues;
- Twenty-four facilities (77 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved;
- Twenty-nine facilities (74 percent) did not display workplace environment posters such as those that inform employees what to do when injured at work;
- Sixteen facilities (52 percent) did not display workplace violence posters, such as *Zero Tolerance Policy and Reporting Procedures*;
- Twenty-three facilities (74 percent) had potential OSHA violations; and
- One facility (3 percent) did not provide handicap accessibility.

¹ *Working Conditions at the Jal Post Office* (Report Number [HR-MA-15-004](#), dated September 2, 2015).

² We judgmentally selected eight facilities based on referrals from employees and customers, hotline complaints, or work performed by other OIG teams.

³ Some facilities may have more than one issue cited.

Conditions related to building safety, security, and maintenance occurred because of competing priorities and local management's failure to focus on cleaning, general maintenance, and repairs.

Conditions related to building safety, security, and maintenance occurred because of competing priorities and local management's failure to focus on cleaning, general maintenance, and repairs. In addition, employees at one district office did not use a safety checklist as required and, instead, used a maintenance checklist for facilities, while no district office conducted facility security checks. Management did not address other deficiencies due to budget constraints or the lessor's refusal to perform requested repairs.

Based on potentially finable OSHA violations found at statistically sampled facilities, we estimated the monetary value of these violations at retail facilities across the Northeast Area would be \$10.6 million.

Attention to these areas would improve employee morale and reduce employee turnover. It would also reduce the risk of injuries to customers and employees and related costs, such as workers' compensation claims, loss of work and productivity, lawsuits, and OSHA fines and penalties. Poorly maintained and unappealing lobbies can also reduce brand loyalty, which impacts revenue.

Local management began taking corrective action by immediately addressing certain deficiencies brought to their attention during site visits, such as displaying missing posters, unblocking exits, and securing unlocked vehicles.

Building Security, Safety, and Maintenance

The Postal Service must improve the security, safety, and maintenance of its retail facilities in the Northeast Area. During our site visits, we assessed the exterior and interior of 31 postal facilities and observed the following:

Building Security

The Postal Service must improve security at its retail facilities based on observations at seven of the 31 facilities we reviewed:⁴

- These seven facilities (23 percent) did not have secured doors or locks for work areas and vehicles.
 - Three vehicles were unlocked during business hours and not secured in a gated parking area – two at one facility and one at another – but neither of them contained mail (see [Figure 1](#)).
 - OIG auditors were able to access unauthorized areas of three facilities – one through the rear of the building, one through a side entrance, and another through a lobby door that connected the customer space and employee work areas. At one location, the supervisor stated that a driver had just left and neglected to ensure the door was locked.
 - At one facility, three secure area doors were unlocked and open. The OIG, U.S. Postal Inspection Service, and postmasters have access to these areas; however, the postmaster did not ensure the doors were locked.⁵
 - At another facility, the employee work and lobby areas had cameras that did not function properly. The facility has three levels with security cameras to ensure no one accessed the area from a lower level. Office management submitted a work order in February 2016 to fix the system; however, the cameras were still inoperable during our April 2016 site visit.

⁴ Some facilities had multiple building security issues.

⁵ The Postal Service OIG and Postal Inspection Service have keys to access the secure inspection areas for their duties. Each facility postmaster also has a key for maintenance of the inspection area. They must notify the OIG and Postal Inspection Service when maintenance is performed and is responsible for ensuring doors remain locked.

Management is responsible for providing maximum protection for Postal Service employees, funds, and property.

Figure 1. Unlocked Mail Truck



Source: OIG photograph taken May 16, 2016, at the Main Office – Totowa, NJ.

Management is responsible for providing maximum protection for Postal Service employees, funds, and property. Postal Service policy states that employees must firmly adhere to the door locking policy.⁶

Building Safety

Based on observations at 16 of the 31 facilities we reviewed, we found the Postal Service can improve the safety of its retail facilities. Specifically:⁷

- Seven facilities (23 percent) had safety hazards such as blocked doors and trip hazards.
- Seven facilities (23 percent) had blocked exits, although signage on the door and floor indicated the area should be kept clear (see [Figure 2](#)).
- Four facilities (13 percent) had fire extinguishers that were not serviced monthly, as required.⁸ Eight fire extinguishers had not undergone monthly inspection and were missing monthly inspection tags and two of the eight had been significantly discharged and were not functional (see [Figure 3](#)).

⁶ Handbook PO-209, *Retail Operations Handbook*, dated October 2012, Section 6-11.3.6.1, Securing Doors, requires employees to firmly adhere to the policy of locking doors. Management is responsible for ensuring compliance to protect Postal Service employees, funds, and property.

⁷ Some facilities had multiple building safety issues.

⁸ Occupational Safety and Health Standards, 1910.157 – Portable Fire Extinguishers.

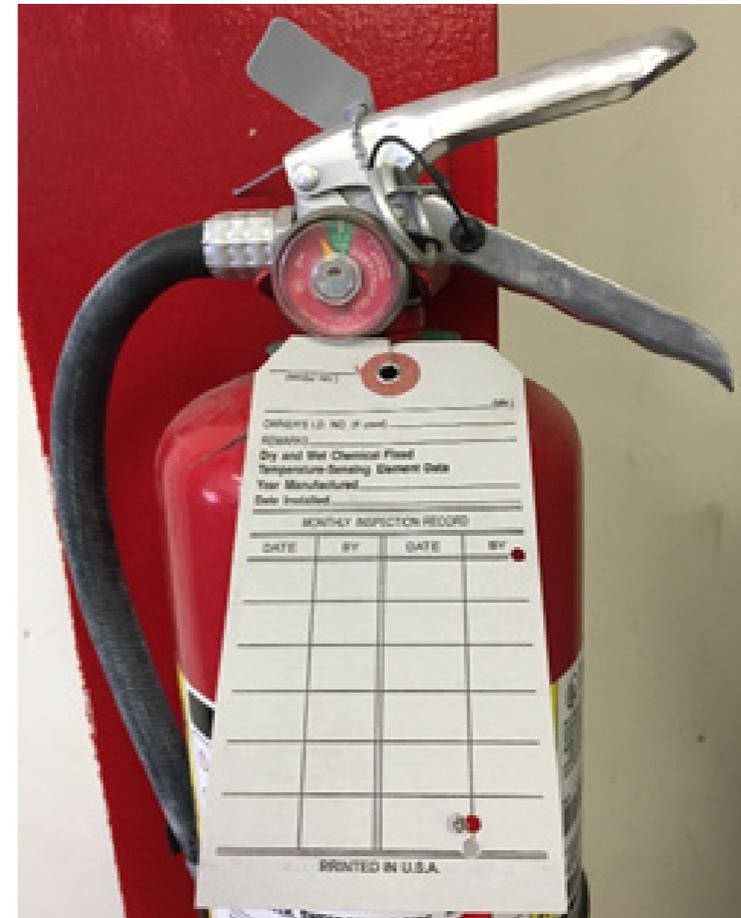
- One facility (3 percent) had a smoke detector that was covered by plastic, impacting its ability to detect smoke. The supervisor on duty stated he did not know why the smoke detector was covered (see [Figure 4](#)).
- Four facilities (13 percent) had potential asbestos issues, each facility had several cracked and broken tiles labeled for asbestos, and one facility had broken tiles that were covered by a rug instead of replaced.
- One facility (3 percent) had equipment that was powered on and missing the cover, exposing the electrical components inside.
- Two facilities (6 percent) had missing wall plates for outlets⁹ (see [Figure 5](#)).

Figure 2: Blocked Exit Door



Source: OIG photograph taken May 17, 2016, at Main Office – Jersey City, NJ.

Figure 3: Discharged and Unserviced Fire Extinguisher



Source: OIG photograph taken May 17, 2016, at Main Office – Jersey City, NJ.

⁹ Handbook AS 503, *Standard Design Criteria*, Section 5-3.1.3, July 17, 2010; and Handbook RE-5, *Building and Site Security*, Section 2-3.2.1, September 2009.

We found 44 potentially finable OSHA violations at 23 of the 31 facilities we visited.

Figure 4: Covered Smoke Detector



Source: OIG photograph taken April 27, 2016, at Greely Square – Brooklyn, NY.

Figure 5: Exposed Electrical Outlet



Source: OIG photograph taken May 16, 2016, at the Main Office – Totowa, NJ.

We found 44 potentially finable OSHA violations¹⁰ at 23 of the 31 facilities we visited. These violations included:

- Locked or blocked emergency exits;
- Sanitary issues relating to leaking plumbing fixtures and roofs;
- Trip hazards;
- Potential asbestos;
- Exposed electrical outlets and electrical boxes;
- Fire extinguishers not serviced monthly;

¹⁰ This footnote is for all bulleted items. Occupational Safety and Health Standards, General Industry – Section 1910; Exits - Section 1910.35; Sanitation – Section 1910.141; Trip Hazards – Section 1910.22; Asbestos and Mold – Sections 1910.1001 and 1910.1000; Electrical and Lighting – Section 1910.303; Fire Extinguishers – Section 1910.157; HVAC/Furnace – Section 1910.269; OSHA posters – Section 1910.1200(a).

Fifteen facilities (48 percent) needed repair and maintenance of paint, plaster, walls, floors, and ceilings.

- Discharged fire extinguishers; and
- Missing required OSHA posters.

The Postal Service is required to maintain a safe environment for both employees and customers. In addition, OSHA requires employers to provide a safe and healthful workplace free of recognized hazards. Postal facilities with OSHA violations may jeopardize the health, safety, and well-being of postal employees and customers. It is the responsibility of the postmaster or postal facility manager to ensure that custodial maintenance is satisfactory.¹¹

Based on the 34 potentially finable OSHA violations we found at 18 of the 23 statistically selected facilities,¹² we projected there are 5,693 potentially finable violations across the 3,851 retail facilities in the Northeast Area. If the violations we found at the sampled facilities were found at the other retail facilities in the Northeast Area, the potential expected monetary value of these violations for the entire area, at the average fine of \$1,867¹³ per incident, would be \$10,628,425.

Building Maintenance

We determined the Postal Service must improve the maintenance of its retail facilities based on the following observations at 17 facilities:¹⁴

- Nine facilities (29 percent) had missing or burned out bulbs or exposed wires.
- Six facilities (19 percent) did not have appealing lobbies. The lobby areas of these facilities had overflowing trash cans, debris on the floor, holes in the walls or dirty walls, inoperable lights, missing cabinet doors, and stained or missing ceiling tiles (see [Figure 6](#)).
- Ten facilities (32 percent) did not have a clean or well-maintained building. Issues included unsanitary conditions; the appearance of mold; poor landscaping; dust on fixtures (such as ceiling fans and lights); uneven sidewalks; and inoperable or stained toilets and sinks (see [Figure 7](#)).
- Fifteen facilities (48 percent) needed repair and maintenance of paint, plaster, walls, floors, and ceilings. Other issues included roof leaks; walls that were either partially painted, stained from a roof leak, or had chipped paint, plaster, or holes; ceiling tiles that were stained, missing, or damaged; and floors that needed to be repaired, cleaned, or polished (see [Figure 8](#)).
- Parking spaces at five facilities (17 percent) were not clearly marked and facility signage was not visible. At one facility the “Reserved for Handicapped,” parking sign was on the ground (see [Figure 9](#)).

¹¹ Handbook MS-47, *Housekeeping Postal Facilities*, Section 111, June 1, 1983.

¹² We did not include the 10 potentially finable OSHA violations we found at our judgmentally selected sites.

¹³ The average fine amount the Postal Service paid for OSHA violations from 2012 to 2015.

¹⁴ Some facilities had multiple building maintenance issues.

Figure 6: Lobby Trash



Source: OIG photograph taken April 28, 2016, at the Bushwick Retail Facility – Brooklyn, NY.

Figure 7: Stained Sink



Source: OIG photograph taken May 26, 2016, at the Main Office – Norwich, CT.

Figure 8: Damaged and Stained Ceiling Tiles



Source: OIG photograph taken May 26, 2016, at the Main Office – Norwich, CT.

Figure 9: Handicap Parking Sign



Source: OIG photograph taken May 18, 2016, at the Main Office – Montague, NJ.

We found that employees at 24 facilities (77 percent) did not maintain a customer complaint log or monitor the timeliness of responses to customers.

The conditions related to building safety, security, and maintenance occurred because:

- District offices used several checklists to inspect safety and maintenance concerns depending on the type of facility and building age. Employees at one district office did not use a safety checklist as required but, instead, used a maintenance checklist for facilities. However, the maintenance checklist did not cover safety inspection areas, which placed facilities in that district at risk of unresolved safety issues. None of the districts used checklists that addressed security concerns.
- Some maintenance deficiencies at Postal Service owned and leased facilities were previously reported in the electronic Facility Maintenance System (eFMS).¹⁵ However, they were not addressed due to budget constraints and uncertainty as to whether the lessor or the Postal Service was responsible for repairs. In addition, repairs needed at owned facilities may not have been approved if they did not meet the criteria of safety, security, or serviceability.¹⁶
- Maintenance, safety, and security deficiencies were not always reported in the Facilities Single Source Provider (FSSP)¹⁷ system as required. Specifically, only eight of 46 deficiencies (17 percent) were reported in FSSP.¹⁸ Of the eight requests reported in the system, none were repaired at the time our review. Postal Service policy requires repair work to be input into FSSP for tracking through the project manager, regardless of the dollar amount or the responsibility.¹⁹
- Due to the limited hours of operation and lack of custodial services at remotely managed post offices (RMPO), employees did not always maintain a clean work environment. RMPOs are budgeted hours to clean the facility each week, while, depending on the size of the facility, hours of operation can range from one to eight per week. RMPO managers focused more on service than facility conditions and did not always ensure the facilities were clean.

The Post Office lobby provides customers with their first and most lasting impression of the Postal Service; therefore, its appearance, convenience, and efficiency directly affect the Postal Service's public image. In addition, Postal Service guidance instructs employees to promote housekeeping throughout the building and the surrounding area.

In our prior reports on facility condition reviews in the Capital Metro and Great Lakes areas, we recommended management revise current policies to improve coordination among Facilities personnel, facility managers, and lessors to resolve issues and make timely repairs before they escalate; reassess the safety inspection process to include an assessment of facility security, repair, and cleanliness issues; and enforce the requirement that all facility personnel perform housekeeping inspections, as required in Handbook MS-47, *Housekeeping Postal Facilities*. These recommendations are still open; therefore, we will not make recommendations to address these areas in this report.

Customer Complaints

The Postal Service needs to improve procedures for monitoring local customer complaints. We found that employees at 24 facilities (77 percent) did not maintain a customer complaint log or monitor the timeliness of responses to customers. Specifically, employees at 22 facilities (71 percent) did not maintain a customer complaint log and employees at three facilities (10 percent)

¹⁵ A Postal Service system used to report maintenance issues.

¹⁶ Criteria used by the Repairs and Alterations group to effectively identify and prioritize workload to develop timely, quality, and cost-effective solutions in meeting postal operations' needs.

¹⁷ Postal Service system used to centralize and track the status of all repair and alteration requests within Facilities.

¹⁸ Deficiencies we identified in the building security, safety, and maintenance sections that should have been reported through the FSSP system.

¹⁹ *Standard Operating Procedure for HUB Repairs and Alterations*, Section 1.3, dated January 2014.

Twenty-nine facilities (94 percent) did not display workplace environment posters and 16 (52 percent) did not display workplace violence posters.

did not monitor the timeliness of initial contact with or final responses to customers. These deficiencies occurred because staff members could not locate the customer complaint log or were unaware of the requirement to maintain a log and resolve complaints within 3 business days. In addition, personnel at some facilities claimed they did not receive any customer complaints and that the RMPO staff forwarded complaints to management at the Administrative Post Office.²⁰

Postal Service standards require facilities' personnel to maintain a customer complaint log and respond to complaints within a specified timeframe.²¹ Without a log, it is difficult to ensure that management addresses and resolves customer complaints in a timely manner, or at all. This could negatively impact the Postal Service's goodwill and brand.

A previous OIG report²² noted that Consumer and Industry Affairs²³ does not have visibility into customer complaints made at local post offices because postmasters are not required to record local complaints in the Enterprise Customer Care (eCC) database²⁴ and are responsible for addressing complaints made directly to their facilities. We recommended management update the policy to require local postmasters to record local complaints in the eCC database and include that information in customer complaint performance reports.

Management planned to address the recommendation by piloting a program whereby a local Post Office would enter customer complaints into the eCC database using a tablet. They planned to develop a business case for senior management to review and decide on the next steps, with a target implementation date of September 30, 2015. However, in June 2016, the OIG closed the recommendation as not implemented because the Postal Service, instead, distributed a management instruction to require customer complaints presented at a Post Office, station, or branch via walk-in to be documented on the customer complaint control log.

Workplace Environment and Workplace Violence Policies

The Postal Service must improve its display of required information related to workplace environment, violence, and emergency preparedness policies. Twenty-nine facilities (94 percent) did not display workplace environment posters and 16 (52 percent) did not display workplace violence posters.²⁵ Specifically, we observed the following:

- Nineteen facilities (61 percent) did not display Poster CA-10, *What a Federal Employee Should Do When Injured at Work*.²⁶
- Sixteen facilities (52 percent) did not display OSHA posters 3165, *Job Safety and Health Protection* (in English) or 3167 (in Spanish).²⁷
- Fifteen facilities (48 percent) did not display the *Zero Tolerance Policy and Reporting Procedures* poster.²⁸

²⁰ The Administrative Post Office is responsible for overseeing the RMPO.

²¹ *Postal Operations Manual* (POM), Section 164.4, requires postmasters and station or branch managers to maintain one or more customer complaint control logs. In addition, Section 165.1 requires the Postal Service to make initial customer contact within 1 business day of receiving a complaint and issue a final response within 3 business days.

²² *Deputy Postmaster General's Use of Data* (Report Number SM-AR-15-002, dated March 15, 2015).

²³ Responsible for Postal Service customer interaction and support from small businesses, individual consumers, large corporations, and commercial mailers.

²⁴ The eCC application is a case management system that is used to manage customer complaints. The application provides for clear and consistent customer responses, actionable data for root cause analysis, and flexible reporting of customer issues to identify trends.

²⁵ Some facilities were missing multiple posters.

²⁶ U.S. Department of Labor – Office of Workers' Compensation, Division of Federal Employees Compensation.

²⁷ The OSHA poster outlines management and employee responsibilities and rights under OSHA.

²⁸ *Threat Assessment Team Guide*, Publication 108, dated May 2015, requires the *Zero Tolerance Policy and Reporting Procedures* poster to be issued to employees by Quarter 2 of each fiscal year, and for it to be posted in a conspicuous place. The poster identifies employee rights and management responsibilities relating to a work environment that is free of harassment and other inappropriate conduct such as discrimination.

- Four facilities (13 percent) did not display Poster 7, *Rules and Regulations Governing Conduct on Postal Property*.²⁹
- Fifteen facilities (48 percent) did not display the OIG poster,³⁰ though it is not required.
- Twenty-three facilities (74 percent) did not have emergency contact numbers by each phone. One facility had an air horn that functioned as a local fire alarm. (see Figure 10).

Figure 10: Air Horn Used As A Fire Alarm



Source: OIG photograph taken May 16, 2016, at the Main Office – Totowa, NJ.

The POM and *Supervisor's Safety Handbook* require management to post workplace environment information at each facility. For the facilities that did not display required posters, staff members were not aware that they were missing the poster and local management did not provide oversight to ensure all appropriate forms were displayed. Displaying the required posters ensures that employees are aware of what to do in the event of an emergency or when injured and of their rights and responsibilities regarding the zero tolerance policy.

At the conclusion of each site visit, OIG auditors provided copies of the required posters to those facilities that did not have them. Local management took immediate corrective action and placed the posters in areas visible to both the public and employees. Management stated they would promptly display all posters received from district management or headquarters.

²⁹ POM, Issue 9, dated July 2002, Section 124, provides rules and regulations for conduct on all real property under the charge and control of the Postal Service. Section 124.1, requires Poster 7 to be displayed in a conspicuous place on all such property.

³⁰ *How to Report Fraud, Waste, and Abuse*.

Handicap Accessibility

One facility listed as a historic building did not have a ramp to provide handicap accessibility and customers had to use stairs to reach the Post Office lobby. The Postal Service is subject to the Architectural Barriers Act (ABA) of 1968, which requires facilities to be handicap accessible. Postal Service management stated they were exempt from this requirement because the building was constructed prior to the ABA and there were no alterations to the facility. Although the ABA allows this exemption, providing a ramp to the building would offer greater accessibility. The Postal Service should continue its efforts to promote accessibility to employees and customers with disabilities.

Recommendations

We recommend management develop an action plan to address all building maintenance, safety, security, workplace environment, and workplace violence policy issues identified during our audit.

We recommend the vice president, Northeast Area, in coordination with vice president, Facilities:

1. Develop an action plan to address all building maintenance, safety, security, workplace environment, and workplace violence policy issues identified during our review. This plan should include a timeline for when items will be completed.

We recommend the vice president, Northeast Area, in coordination with the vice president, Employee Resource Management:

2. Coordinate training to reinforce Postal Service policies and procedures related to the issues identified during our review. Specifically:
 - Maintenance and housekeeping standards to improve the customer retail experience.
 - Safety standards to prevent injuries to employees and customers and to reduce the Postal Service's exposure to Occupational Safety and Health Administration fines.
 - Security standards of facilities, yards, and vehicles to protect employees, Postal Service property, and mail.
 - Maintenance of customer complaint logs so customer complaints are recorded, tracked, and resolved timely.
 - Consistent display of required posters so they are available to employees.

Management's Comments

Management agreed with our recommendations, but disagreed with the methodology used to determine the monetary impact of \$10,628,425 related to potentially finable OSHA violations.

Regarding recommendation 1, management agreed to develop an action plan to address all building maintenance, safety, security, workplace environment, and workplace violence policy issues identified during our review. Management stated that all building maintenance and safety issues identified during the audit will be tracked for completion. The target implementation date is December 15, 2016.

Management will also issue correspondence to all Northeast Area districts to enforce posting of required information, such as *What a Federal Employee Should Do When Injured at Work*; *OSHA – Job Safety and Health Protection*; *Zero Tolerance Policy*; and *Rules and Regulations Governing Conduct on Postal Service Property*. This information will be published on the Northeast Area website. Management will also ensure the Facility Emergency Action Plan and Facility Fire Prevention Plan are posted at the facilities identified in the report. The target implementation date is November 15, 2016.

Management further stated that Northeast Area field specialists will continue to use the Facility Condition Review Checklist during onsite reviews and share results with the installation head and district manager. The Postal Service implemented this process June 22, 2016.

Regarding recommendation 2, as of November 1, 2016, management agreed to provide all nationally required training related to maintenance and housekeeping standards; safety and security standards; and maintenance of customer complaint logs.

Management stated that installation heads or other responsible parties will be notified of the required training and the medium necessary for completion. Area and District Safety personnel will use the Safety and Health Program Evaluation Guide audit process and Learning Management System training records to identify training needs. Human Resources will track these activities and provide quarterly progress reports in FY 2017.

Management disagreed with our monetary impact, stating that we based it on proposed fines versus actual fines. Management stated that from 2012 through 2016, the Postal Service's incurred fines were 41 percent less than its proposed fines. Management also stated that 15 of the 34 infractions cited were for missing OSHA posters and a review of fines from 2012 through 2016 does not support monetary impact from missing OSHA posters. Management further stated that the calculation assumptions overstate the risk and monetary impact in the report and that monetary impact should be based on actual fines incurred for the type of infraction identified to provide an accurate assessment.

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

Evaluation of Management's Comments

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

Regarding the monetary impact, the OIG calculated it using a conservative methodology based on the average actual fines the Postal Service paid for OSHA violations assessed between 2012 and 2015. The auditors could not assess whether an issue they discovered would result in an actual OSHA fine, but based assessments on OSHA criteria and fines paid by the Postal Service in the past. Further, we did not state the 34 documented infractions were, without question violations but, instead, noted the issues were "potential" violations.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. No recommendations should be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

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Appendix A: Additional Information

Background

The Postal Service has more than 30,000 retail facilities nationwide. The majority of these properties — about 25,000 — are leased and some have been occupied for more than 100 years. The Northeast Area has 3,851 retail facilities –2,977 of them are leased and 854 are owned.³¹ The Postal Service is responsible for maintaining its owned facilities, while leased property owners are responsible for some building maintenance, as specified in individual lease agreements. The Post Office lobby is the principal business office of the Postal Service and is the only close-up view of postal operations for many customers; therefore, its appearance, convenience, and efficiency directly affect the Postal Service’s public image.

The Postal Service is required to maintain a safe environment for both employees and customers. In addition, like any other employer, the Postal Service must follow federal OSHA safety laws. The Postal Service also follows general policies and procedures regarding safety and security and the housekeeping and appearance of its lobbies and facilities.

In September 2015, the OIG issued a management alert that identified poor working conditions at a Post Office in New Mexico. We found problems with heating and air conditioning, lighting, and electrical and plumbing systems, as well as deteriorating building conditions. Management agreed with our recommendations to resolve the identified problems, conduct periodic observations and develop an action plan, and provide safety training to employees. Because of the unacceptable conditions found at that Post Office, the OIG is conducting a series of facility condition reviews at retail facilities nationwide.

Objective, Scope, and Methodology

Our objective was to determine if Postal Service management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities.

To accomplish our objective we:

- Statistically sampled 23 facilities in nine districts in the Northeast Area.
- Conducted unannounced site visits during March and April 2016, at all 23 statistically selected facilities; and visited eight additional facilities based on work conducted by OIG auditors from other directorates, referrals, and Hotline complaints (see [Table 1](#)).
- Used an OIG-developed checklist that focused on facility appearance, safety, and security; customer complaints; workplace environment and violence; and handicap accessibility.
- Provided a copy of the completed checklist to the area comptroller, district manager, and local management.
- Interviewed facility managers and Postal Service personnel about inspections, policies and procedures, and other matters relating to facility management.
- Reviewed facility repair and maintenance requests entered into the eFMS; facility inspections captured in the Infrastructure Condition Assessment Model (ICAM)³² database; and safety inspections conducted by Employee Resource Management.
- Analyzed OSHA violations to project the potential impact to the Postal Service based on prior fines.

³¹ The remaining properties are either General Services Administration (GSA) property, military property, or another federal property.

³² ICAM is the system for recording and maintaining inspections.

Table 1: Facilities Visited in the Northeast Area

District	Leased/ Owned	Unit Name	City, State
Albany PFC	Leased	Rensselaer – Main Office	Rensselaer, NY
Albany PFC	Owned	Mexico – Main Office	Mexico, NY
Albany PFC	Owned	Guilderland – Main Office	Guilderland, NY
Long Island PFC	Owned	Westhampton – Main Office	Westhampton, NY
New York PFC	Leased	New York – Greeley Square Station	New York, NY
Triboro PFC	Leased	Brooklyn, NY – Pratt Station – Pratt Station Retail	Brooklyn, NY
Northern New England PFC	Leased	Norton – Main Office	Norton, VT
Northern New England PFC	GSA	Montpelier – Main Office	Montpelier, VT
Northern New England PFC	Leased	Ludlow – Main Office	Ludlow, VT
Northern New England PFC	Leased	Lisbon – Sugar Hill Station	Sugar Hill, NH
Albany PFC	Owned	Plattsburgh – Main Office	Plattsburgh, NY
Westchester PFC	Leased	Sloatsburg – Main Office	Sloatsburg, NY
Northern NJ PFC	Leased	Branchville - Montague Finance Unit	Montague, NJ
Northern NJ PFC	Owned	Paterson – Totowa Branch	Totowa, NJ
Greater Boston PFC	Leased	Boston – Somerville Branch	Somerville, MA
Greater Boston PFC	Leased	Fitchburg – Prichard Plaza Station	Fitchburg, MA
Greater Boston PFC	Leased	Chelmsford – Main Office	Chelmsford, MA
Northern New England PFC	Leased	Sandown – Main Office	Sandown, NH
Northern New England PFC	Leased	Sullivan – Main Office	Sullivan, NH
Westchester PFC	Leased	Hollowville – Main Office	Hollowville, NY
Connecticut Valley PFC	Leased	Terryville – Main Office	Terryville, CT
Connecticut Valley PFC	Leased	New Haven – Baybrook Station	West Haven, CT
Connecticut Valley PFC	Leased	Cornwall Bridge – Main Office	Cornwall Bridge, CT
Connecticut Valley PFC	Owned	Norwich – Main Office	*Norwich, CT
Triboro PFC	Leased	Brooklyn – Bushwick Station	*Brooklyn, NY
Triboro PFC	Owned	Brooklyn – Williamsburg Station	*Brooklyn, NY
Northern NJ PFC	Leased	Jersey City – Hudson City Station	*Jersey City, NJ
Westchester PFC	Leased	Mellenville – Main Office	*Mellenville, NY
Northern New England PFC	GSA	Augusta – Main Office	*Augusta, ME
Northern New England PFC	Owned	Hampton – Main Office	*Hampton, NH
Greater Boston PFC	Owned	Fort Point Station	*Boston, MA

Source: OIG statistically and judgmentally selected sample from the Postal Service's eFMS.
*Judgmentally selected facilities.

We conducted this performance audit from April through November 2016, in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit 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 October 5, 2016, and included their comments where appropriate.

We obtained facility information from the eFMS and compared a statistical sample of retail facilities to the ICAM database and mapping applications to verify the facilities' existence. 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>Facility Condition Reviews – Capital Metro Area</i>	Our objective was to determine if Postal Service management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities.	SM-AR-16-009	7/18/2016	None
<i>Facility Condition Reviews – Great Lakes Area</i>	Our objective was to determine if Postal Service management adhered to building maintenance, safety, and security standards, and employee working condition requirements at retail facilities.	SM-AR-16-010	9/2/2016	None
<i>Working Conditions at the Jal Post Office</i>	Our objective was to investigate reported poor working conditions at the Jal Post Office in New Mexico.	HR-MA-15-004	9/2/2015	None
<i>Deputy Postmaster General Use of Data</i>	Our objective was to determine whether the DPMG effectively uses internal and external business data to manage business activities and mitigate risk.	SM-AR-15-002	3/19/2015	None

Appendix B: Fieldwork Observation Summary

District	Triboro	Albany				Northern NJ		Greater Boston			Connecticut Valley			Northern New England					New York	Westchester		Long Island	Judgmental Sample								Total				
Facility	Brooklyn, NY (Pratt Station)	Rensselaer, NY	Mexico, NY	Guiderland, NY	Plattsburgh, NY	Montague, NY	Totowa, NJ	Somerville, MA	Fitchburg, MA	Chelmsford, MA	Terryville, CT	West Haven, CT	Cornwall Bridge, CT	Norton, VT	Montpelier, VT	Ludlow, VT	Sugar Hill, NH	Sandown, NH	Sullivan, NH	New York, NY (Greely Sq.)	Sloatsburg, NY	Hollowville, NY	Westhampton, NY	Norwich, CT	Bushwick Station, NY	Williamsburg Station, NY	Hudson City, NJ	Mellenville, NY	Augusta, ME	Hampton, NH	Fort Pt. Station, MA	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
Building Maintenance																																			
Is the building clean and well maintained?	D	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	D	D	D	✓	✓	✓	✓	D	D	D	D	D	✓	✓	✓	21	10	0	32%
Are paint, plaster, wall, floor, and ceiling coverings in good condition?	✓	✓	✓	✓	D	✓	✓	✓	✓	D	✓	✓	✓	D	✓	D	D	D	D	D	✓	D	✓	D	D	D	D	D	✓	✓	D	16	15	0	48%
Is the lobby inviting?	D	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	D	✓	D	✓	✓	✓	✓	26	5	0	16%	
Is landscaping well maintained and is all excessive equipment removed from the facility?	X ¹	✓	✓	✓	X ¹	✓	✓	✓	X ¹	✓	✓	X ¹	✓	X ¹	X ¹	✓	✓	✓	X ¹	✓	✓	✓	D	D	X ¹	X ¹	D	✓	✓	✓	19	3	9	10%	
Is there sufficient lighting inside/ outside the facility?	✓	✓	✓	✓	D	✓	✓	✓	✓	D	✓	✓	✓	✓	D	✓	D	✓	✓	✓	D	✓	✓	D	D	D	✓	✓	✓	✓	D	22	9	0	29%
Are docks, platforms, and parking areas properly marked?	X ¹	✓	✓	✓	D	✓	✓	✓	X ¹	✓	✓	X ¹	✓	✓	D	X ¹	D	D	X ¹	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	21	4	6	13%	
Building Safety and Security																																			
Are non-retail doors of the facility secured and are all vehicles locked and empty of mail?	✓	D	✓	✓	✓	✓	D	✓	X ¹	D	✓	✓	✓	✓	D	D	✓	✓	✓	✓	✓	✓	✓	D	✓	X ¹	D	✓	✓	✓	✓	22	7	2	23%

✓ – No deficiency D – Deficiency
X¹ – Not applicable X² – Not observed

District	Triboro	Albany				Northern NJ		Greater Boston			Connecticut Valley			Northern New England					New York	Westchester	Long Island	Judgmental Sample								Total							
Facility	Brooklyn, NY (Pratt Station)	Rensselaer, NY	Mexico, NY	Guilfordland, NY	Plattsburgh, NY	Montague, NY	Totowa, NJ	Somerville, MA	Fitchburg, MA	Chelmsford, MA	Terryville, CT	West Haven, CT	Cornwall Bridge, CT	Norton, VT	Montpelier, VT	Ludlow, VT	Sugar Hill, NH	Sandown, NH	Sullivan, NH	New York, NY (Greely Sq.)	Sloatsburg, NY	Hollowville, NY	Westhampton, NY	Norwich, CT	Bushwick Station, NY	Williamsburg Station, NY	Hudson City, NJ	Mellenville, NY	Augusta, ME	Hampton, NH	Fort Pt. Station, MA	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %		
Is the building free of obvious OSHA safety hazards?	D	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	D	D	✓	✓	D	✓	✓	D	✓	D	D	D	D	D	D	D	D	✓	✓	✓	17	14	0	45%		
Are there other safety concerns?	D	✓	✓	✓	✓	✓	D	✓	✓	D	✓	✓	✓	✓	D	D	✓	✓	✓	✓	✓	D	D	D	X ¹	D	D	✓	✓	✓	✓	20	10	1	32%		
Customer Complaints																																					
Are one or more customer complaint control logs maintained at the facility?	D	D	✓	✓	D	D	D	D	D	D	✓	✓	✓	D	✓	D	D	D	D	D	D	D	✓	D	D	D	✓	D	D	X ¹	D	7	22	2	71%		
Are all initial contacts and final responses with the customer made within required timeframes, after receiving the comment or complaint?	X ¹	X ¹	D	X ²	X ¹	D	X ¹	X ¹	X ¹	X ¹	✓	X ²	✓	X ¹	X ²	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	D	X ¹	X ¹	X ¹	X ¹	X ¹	3	3	25	10%					
Workplace Environment																																					
CA-10, What a Federal Employee Should Do When Injured at Work. Is the CA-10 posted for review by employees?	D	D	✓	D	D	D	D	D	D	D	✓	✓	D	✓	✓	D	D	D	✓	D	D	D	✓	D	✓	D	D	✓	✓	✓	✓	✓	12	19	0	61%	
Are the 3165 (English) and 3167 (Spanish) OSHA posters on display?	D	✓	D	✓	✓	D	D	D	D	D	D	D	D	✓	✓	D	D	✓	✓	D	D	D	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	15	16	0	52%

✓ – No deficiency D – Deficiency
X¹ – Not applicable X² – Not observed

District	Triboro	Albany				Northern NJ	Greater Boston			Connecticut Valley			Northern New England						New York	Westchester		Long Island	Judgmental Sample								Total				
Facility	Brooklyn, NY (Pratt Station)	Rensselaer, NY	Mexico, NY	Guilderland, NY	Plattsburgh, NY	Montague, NY	Totowa, NJ	Somerville, MA	Fitchburg, MA	Chelmsford, MA	Terryville, CT	West Haven, CT	Cornwall Bridge, CT	Norton, VT	Montpelier, VT	Ludlow, VT	Sugar Hill, NH	Sandown, NH	Sullivan, NH	New York, NY (Greely Sq.)	Sloatsburg, NY	Hollowville, NY	Westhampton, NY	Norwich, CT	Bushwick Station, NY	Williamsburg Station, NY	Hudson City, NJ	Mellenville, NY	Augusta, ME	Hampton, NH	Fort Pt. Station, MA	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
The facility Emergency Action Plan (EAP) (ELM 820) is required at facilities with more than 10 employees. Is the EAP posted for review by employees?	X ¹	✓	✓	✓	✓	X ¹	✓	X ¹	X ¹	✓	✓	X ¹	X ¹	X ¹	✓	X ¹	X ¹	✓	X ¹	X ¹	✓	X ¹	✓	✓	✓	D	X ¹	✓	✓	✓	16	1	14	3%	
The facility Fire Prevention Plan (FPP) (ELM 820) is required at facilities with more than 10 employees. Is the FPP posted for review by employees?	X ¹	✓	X ¹	✓	✓	X ¹	D	X ¹	X ¹	X ¹	✓	X ¹	X ¹	X ¹	✓	X ¹	D	X ¹	✓	D	D	D	D	X ¹	D	✓	D	7	8	16	26%				
Are emergency contact numbers placed by each phone? If all phones in the facility do not have emergency contact numbers, is there an alarm system or some other mechanism in place that would justify not having emergency contact numbers by each phone?	D	D	D	✓	D	D	D	D	✓	D	D	✓	D	D	D	D	D	D	D	D	D	✓	D	D	D	D	D	✓	✓	✓	✓	8	23	0	74%
Although not required, does the facility have an OIG poster displayed?	D	✓	✓	✓	D	D	✓	D	D	✓	✓	D	✓	D	✓	D	D	✓	D	✓	D	D	✓	✓	✓	D	D	✓	✓	✓	D	16	15	0	48%

✓ – No deficiency D – Deficiency
X¹ – Not applicable X² – Not observed

District	Triboro	Albany				Northern NJ		Greater Boston			Connecticut Valley			Northern New England					New York	Westchester	Long Island	Judgmental Sample								Total						
Facility	Brooklyn, NY (Pratt Station)	Rensselaer, NY	Mexico, NY	Guilfordland, NY	Plattsburgh, NY	Montague, NY	Totowa, NJ	Somerville, MA	Fitchburg, MA	Chelmsford, MA	Terryville, CT	West Haven, CT	Cornwall Bridge, CT	Norton, VT	Montpelier, VT	Ludlow, VT	Sugar Hill, NH	Sandown, NH	Sullivan, NH	New York, NY (Greely Sq.)	Sloatsburg, NY	Hollowville, NY	Westhampton, NY	Norwich, CT	Bushwick Station, NY	Williamsburg Station, NY	Hudson City, NJ	Mellenville, NY	Augusta, ME	Hampton, NH	Fort Pt. Station, MA	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %	
Workplace Violence																																				
Does the facility have the Zero Tolerance Policy and Reporting Procedures poster displayed?	✓	✓	✓	✓	D	D	✓	D	D	D	D	D	D	✓	✓	D	D	✓	✓	D	D	D	✓	✓	✓	D	D	✓	✓	✓	✓	✓	16	15	0	48%
Does the facility have a 7 Rules and Regulations Governing Conduct on Postal Property poster displayed?	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	D	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	27	4	0	13%	
Other																																				
Is the facility handicap accessible?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	30	1	0	3%
Totals																																				
No Issue	6	15	16	18	10	10	11	11	9	7	17	10	13	12	14	5	5	12	10	9	10	8	17	7	9	5	5	12	17	18	14					
Deficiency	9	4	3	1	8	8	8	6	5	11	3	4	5	5	4	11	11	6	7	6	9	8	3	12	9	12	14	5	2	0	5					
	5	1	1	1	2	2	1	3	6	2	0	6	2	3	2	4	4	2	3	5	1	4	0	1	2	3	1	3	1	2	1					
FSSP																																				
Total Reportable Deficiencies ³³	0	1	0	0	3	0	2	0	0	3	0	1	1	1	1	4	2	2	2	1	1	3	2	2	2	4	4	2	0	0	2	46				
Deficiencies Reported in FSSP	0	0	0	0	0	0	0	0	0	1	0	1	0	1	0	0	0	0	0	0	1	1	0	0	2	0	0	1	0	0	0	8				

✓ – No deficiency D – Deficiency
X¹ – Not applicable X² – Not observed

33 Deficiencies we identified in the building security, safety, and maintenance sections that should have been reported through the FSSP system.

Appendix C: Management's Comments

EDWARD F. PHELAN, JR.
VICE PRESIDENT, AREA OPERATIONS
NORTHEAST AREA



October 31, 2016

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Draft Report Facility Conditions Reviews – Northeast Area
(Report Number SM-AR-16-DRAFT)

Thank you for providing the Northeast Area with the opportunity to review and comment on the recommendations contained in Draft Report Facility Conditions Reviews – Northeast Area (Report Number SM-AR-16-DRAFT)

Recommendation 1

Develop an action plan to address all building maintenance, safety, security, workplace environment, and workplace violence policy issues identified during our review. This plan should include a timeline for when items will be completed.

Management Response/Action Plan

The Northeast Area agrees with this recommendation and will implement the following plan to address all building maintenance, safety, security, workplace environment, and workplace violence policy issues identified during the review.

The Northeast Area plan includes:

1. All building maintenance and facility related safety issues identified by the audit are being tracked for completion.

Target Implementation Date: December 15, 2016

Responsible Official: David Letourneau

2. The Northeast Area Vice President will issue correspondence to all Northeast Area Districts to address posting requirements:
 - a. CA-10 - What a Federal Employee should do when Injured at Work
 - b. OSHA 3165 (English) and 3167 (Spanish) posters
 - c. Zero Tolerance Policy
 - d. 7 Rules and Regulations Governing Conduct on on Postal Property

6 GRIFFIN ROAD NORTH
WINDSOR, CT 06096-7010
WWW.USPS.COM

These will also be posted on the Northeast Area website.

3. Northeast Area Safety will review the Integrated Emergency Management Module/Facilities Database System (IEMM/FDB) for completion of both Facility Emergency Action Plan and the Facility Fire Prevention Plan for completion and posting for those sites identified in this report.

Target Implementation Date: November 15, 2016

Responsible Official: Donna Gill

4. The Northeast Area Field Financial Specialists will continue to utilize the Facility Condition Review Checklist during any onsite reviews with results being shared with installation head and appropriate District Manager.

Target Implementation Date: Implemented June 22, 2016

Responsible Official: Elizabeth Doell

Recommendation 2

Coordinate training to reinforce Postal Service policies and procedures related to the issues identified during our review. Specifically:

- Maintenance and housekeeping standards to improve the customer retail experience.
- Safety standards to prevent injuries to employees and customers and to reduce the Postal Service's exposure to Occupational Safety and Health Administration fines.
- Security standards of facilities, yards, and vehicles to protect employees, Postal Service property, and mail.
- Maintenance of customer complaint logs so customer complaints are recorded, tracked, and resolved timely.
- Consistent display of required posters so they are available to employees.

Management Response/Action Plan

The Northeast Area agrees with this recommendation and will provide all nationally required training related to:

- Maintenance and housekeeping standards to improve the customer retail experience.
- Safety standards to prevent injuries to employees and customers and to reduce the Postal Service's exposure to Occupational Safety and Health Administration fines.
- Security standards of facilities, yards, and vehicles to protect employees, Postal Service property, and mail.
- Maintenance of customer complaint logs so customer complaints are recorded, tracked, and resolved timely.

Installation heads or other responsible parties will be notified of the required training and medium necessary for completion. Once training is completed, hard copies or LMS records will be kept as applicable. Area and District Safety will use the PEG audit process, and Learning Management System (LMS) training records to identify training needs. Human Resources will track these activities and report on progress quarterly for FY 2017.

Target Implementation Date: November 1, 2016

Responsible Official: John Godlewski


Edward F. Phelan Jr.

EDWARD F. PHELAN, JR.
VICE PRESIDENT, AREA OPERATIONS
NORTHEAST AREA



October 31, 2016

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Facility Condition Reviews – Northeast Area
(Report Number SM-AR-16-DRAFT)

Thank you for providing the Northeast Area with the opportunity to review and comment on the Monetary and Other Impacts contained in Facility Condition Reviews – Northeast Area (Report Number SM-AR-16-DRAFT).

Monetary Impact

Recommendations	Impact Category	Amount
1 and 2	Funds Put to Better Use ¹	\$10,628,425

Management Response/Action Plan:

The Northeast Area disagrees with this impact. The proposed impact used proposed fines versus actual fines. From 2012 through 2016 USPS incurred fines were 41% less than the proposed fines. In addition, 15 of the 34 infractions cited in the report were for missing OSHA posters calculated at a 65.2% infraction rate applied against our 3,851 facilities. A review of fines from 2012 through 2016 does not support any monetary impact associated with missing an OSHA poster. Both of these calculation assumptions overstate the risk and monetary impact included in the report. The monetary impact should be based on actual fines incurred for the type of infractions identified in the report to provide an accurate assessment.


Edward F. Phelan, Jr.

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