



OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Facility Condition Reviews – Southern Area

Audit Report

Report Number
SM-AR-17-003

April 28, 2017





OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Highlights

***Fifty-nine facilities (83 percent)
had potential OSHA violations.***

Background

The U.S. Postal Service has more than 30,000 leased and owned retail facilities nationwide. The post office lobby is the principal business office of the Postal Service and its 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 both 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 71 of over 5,400 retail facilities in the Southern Area and assessed issues related to building safety, security, maintenance, customer complaints, and workplace environment and violence. We also assessed whether each facility was handicap accessible.

This is the fourth 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. During our review of 71 facilities we found:

- Forty-five (63 percent) had building safety and security issues;
- Forty-nine (69 percent) had building maintenance issues;
- Forty-eight (68 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved;
- Sixty-four (90 percent) did not display workplace environment posters such as those that inform employees what to do when injured at work;
- Thirty-two (45 percent) did not display workplace violence posters, such as *Zero Tolerance Policy and Reporting Procedures*;
- Fifty-nine (83 percent) had potential OSHA violations; and
- All facilities provided handicap accessibility but one needed structural repair to the ramp.

Issues 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, and housekeeping inspections. Management did not address other deficiencies due to budget constraints.



OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

During our review of 71 facilities we found:

45
facilities

49
facilities

48
facilities

64
facilities

32
facilities

59
facilities

 **ALL** facilities provided handicap accessibility but **1** needed structural repair to the ramp.



OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

In addition, management did not provide sufficient oversight of or effectively communicate with employees regarding requirements for reporting deficiencies, completing inspections and facility maintenance, or the need to maintain a customer complaint log.

Attention to these areas could reduce the Postal Service's exposure to OSHA fines and penalties. It could also improve employee morale and reduce turnover. Further, focus on these areas could reduce 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 our site visits, such as displaying missing posters, unblocking exits, and securing unlocked vehicles.

What the OIG Recommended

We recommended management develop and implement an action plan to address all building safety, security, maintenance, and workplace environment and violence policy issues identified during our audit; direct retail facilities to timely input all applicable safety, security, and maintenance issues into the electronic Facilities Management System; and reiterate requirements to perform housekeeping inspections and maintain customer complaint logs.

We also recommended management establish an oversight mechanism to ensure adherence to policies and procedures relating to maintenance standards, fire extinguisher maintenance, facility and vehicle safety, and poster display.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

April 28, 2017

MEMORANDUM FOR: SHAUN E. MOSSMAN
VICE PRESIDENT, AREA OPERATIONS –
SOUTHERN AREA

TOM A. SAMRA
VICE PRESIDENT, FACILITIES

KELLY SIGMON
VICE PRESIDENT, RETAIL AND
CUSTOMER SERVICE OPERATIONS

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 –
Southern Area (Report Number SM-AR-17-003)

This report presents the results of our audit of Facility Condition Reviews – Southern Area (Project Number 16SMG012SM000).

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

Attachment

cc: Postmaster General
Corporate Audit and Response Management

Table of Contents

Cover	
Highlights.....	1
Background.....	1
What the OIG Found.....	1
What the OIG Recommended.....	3
Transmittal Letter.....	4
Findings.....	6
Introduction.....	6
Summary.....	6
Building Security, Safety, and Maintenance.....	7
Building Security.....	7
Building Safety.....	8
Building Maintenance.....	10
Customer Complaints.....	13
Workplace Environment and Violence.....	13
Handicap Accessibility.....	14
Recommendations.....	15
Management’s Comments.....	15
Evaluation of Management’s Comments.....	16
Appendices.....	17
Appendix A: Additional Information.....	18
Background.....	18
Objective, Scope, and Methodology.....	18
Prior Audit Coverage.....	21
Appendix B: Fieldwork Observation Summary.....	22
Appendix C: Assist Work Observation Summary.....	25
Appendix D: Management’s Comments.....	29
Contact Information.....	33

Findings

Introduction

This report presents the results of our self-initiated audit of facility conditions in the Southern Area (Project Number 16SMG012SM000). 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. Furthermore, the Postal Service must maintain a safe environment for both employees and customers and follow federal safety laws set forth by the Occupational Safety and Health Administration (OSHA). The Postal Service also follows internal policies and procedures regarding safety, security, and the appearance of lobbies and facilities. It has more than 30,000 leased and owned retail facilities nationwide, 5,470 of which are in the Southern 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. For this audit — the fourth in the series — we visited 28 statistically sampled and 43 judgmentally selected facilities.²

Summary

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

- Forty-five facilities (63 percent) had building safety and security issues;
- Forty-nine facilities (69 percent) had building maintenance issues;
- Forty-eight facilities (68 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved;
- Sixty-four facilities (90 percent) did not display workplace environment posters such as those that inform employees what to do when injured at work;
- Thirty-two facilities (45 percent) did not display workplace violence posters, such as the *Zero Tolerance Policy and Reporting Procedures* poster;
- Fifty-nine facilities (83 percent) had potential OSHA violations; and
- All facilities provided handicap accessibility, but one needed structural repair to the ramp.

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

² We judgmentally selected 43 facilities based on referrals from employees and customers, Hotline complaints, or work performed by other OIG teams.

³ Some facilities may have had more than one issue cited.

Issues 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, and housekeeping inspections.

Issues 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, and housekeeping inspections.⁴ Management did not address other deficiencies due to budget constraints. In addition, management did not provide sufficient oversight of or effectively communicate with employees regarding requirements for reporting deficiencies; completing inspections and facility maintenance; or the need to maintain a customer complaint log.

Attention to these areas could 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 affects revenue.

Local management began taking corrective action by immediately addressing certain deficiencies brought to their attention during our 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 Southern Area. During our site visits, we assessed the exterior and interior conditions of 71 postal facilities and observed the following:⁵

Building Security

The Postal Service must improve security at its retail facilities. Specifically:

- Five facilities (7 percent) had unlocked postal vehicles. As a result, OIG auditors were able to access 29 vehicles, 9 of which contained mail. Management took corrective action by securing all vehicles during our visit (see Figure 1).
- Four facilities (6 percent) had untrimmed trees or bushes that could allow unauthorized access to the building or fenced area. One facility had an overgrown tree in the back that could conceal a trespasser or allow access to the roof.
- One facility had inadequate exterior lighting with more than half of the lights in the customer parking lot not working.
- One facility had a damaged barbed wire fence, which could allow unauthorized access to the building.
- One facility had a dock area security camera that was broken. Specifically, the images from the camera did not display on the monitor.

Management is responsible for providing maximum protection for Postal Service employees, funds, and property.⁶

Figure 1: Unlocked Vehicle



Source: OIG photograph – Lake Travis Branch, Lakeway, TX, dated September 27, 2016.

⁴ Housekeeping inspections must be done quarterly at all facilities. Facilities are required to document satisfactory or unsatisfactory conditions throughout the facility.

⁵ Some facilities had multiple issues.

⁶ Handbook PO-209, *Retail Operations Handbook*, Sections 6-6 and 6-11, dated October 2012.

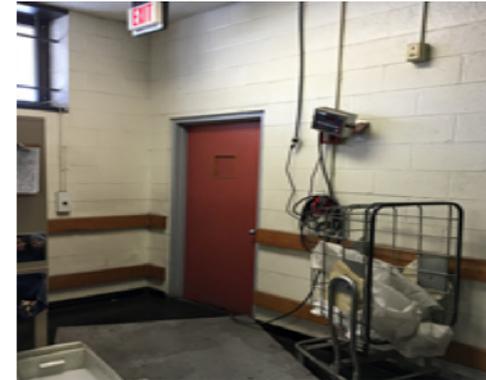
Twenty-four facilities (34 percent) had fire extinguishers that were not serviced monthly or annually as required, including one facility with fire extinguishers that had not been serviced annually since 2003.

Building Safety

The Postal Service must improve safety at its facilities. Specifically:

- One facility had a large floor scale blocking an exit door (see Figure 2).
- One facility had unsecured wires and cords between the workroom floor and front counter (see Figure 3).
- Three facilities (4 percent) had suspected mold and possible asbestos⁷ exposure and one had an asbestos warning sign on a damaged wall (see Figure 4).
- Twenty-four facilities (34 percent) had fire extinguishers that were not serviced monthly or annually as required,⁸ including one facility with fire extinguishers that had not been serviced annually since 2003 (see Figure 5). Two facilities (3 percent) had blocked electrical panels (see Figure 6).

Figure 2: Blocked Exit Door



Source: OIG photograph, Magnolia Post Office – Magnolia, TX, dated October 21, 2016.

Figure 3: Unsecured Wires



Source: OIG photograph, Parkin Post Office – Parkin, AR, dated October 13, 2016.

Figure 4: Potential Asbestos Wall



Source: OIG photograph, Bogalusa Post Office – Bogalusa, LA, dated October 17, 2016.

Figure 5: Uninspected Fire Extinguisher



Source: OIG photograph, Hamburg Post Office – Hamburg, AR, dated October 19, 2016.

Figure 6: Blocked Electrical Panels



Source: OIG photograph, Miami Springs Branch – Miami, FL, dated September 28, 2016.

⁷ Possible asbestos exposure refers to asbestos-labeled floor tiles or walls that are cracked or damaged.

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

We found 121 potentially finable OSHA violations at 59 of the 71 facilities we visited.

- Eight facilities (11 percent) were either missing exit signs or had signs that were not illuminated to indicate exit routes.
- Four facilities (6 percent) had potholes in the parking lots.
- One facility had rusty standing water in a basement room that housed the air conditioning unit (see Figure 7). The water seeped outside of the room and damaged boxes and other materials. The postmaster was unaware that the basement had standing water and said the facility had an ongoing sump pump issue.
- Two facilities (3 percent) had air conditioning (AC) units that did not work properly. At one facility, a temporary AC unit was used to cool the workroom floor (see Figure 8). Local management reported this issue for repair in the electronic Facilities Management System (eFMS)⁹ in March 2013, July 2014, and April 2016. Although repairs were made, the unit did not work properly at the time of our visit in September 2016. At another facility, personal fans were on each workstation throughout the workroom floor to keep the area cool. Local management reported the AC problems in eFMS in May 2015 and again in August 2015; however, maintenance did not address the deficiencies.
- Thirty-six facilities (51 percent) had missing or burned out bulbs throughout the building, with insufficient lighting inside and outside, making the work area dark or the facility potentially unsafe. For example, at one facility 50 percent of the lights in the customer parking lot did not work. At another facility, the area leading to the restroom and postmaster work area did not have sufficient lighting. There were no overhead lighting fixtures so the postmaster had to use a desk lamp.
- Three facilities (4 percent) had exposed wires.

We found 121 potentially finable OSHA violations¹⁰ at 59 of the 71 facilities we visited. These violations included:

- Potential asbestos and suspected mold;
- Trip hazards;
- Blocked electrical boxes or exposed wires;
- Blocked exits;

⁹ eFMS is used to create, manage, and complete facility projects of all types.

¹⁰ 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; Means of Egress – Section 1910.37(b)(2); OSHA posters – Section 1910.1200(a).

Figure 7: Rusty Standing Water



Source: OIG photograph, Bogalusa Post Office – Bogalusa, LA, dated October 17, 2016.

Figure 8: Temporary AC Unit



Source: OIG photograph, Venus Post Office – Venus, FL, dated September 27, 2016.

- Fire extinguishers not serviced monthly or annually;
- Roof leaks/condensation near electrical units;
- Overloaded electrical outlets and extension cords;
- Exit signs missing or not properly illuminated;
- Inadequate lighting; 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 healthy workplace free of recognized hazards. Postal facilities with OSHA violations may jeopardize the health, safety, and well-being of postal employees and customers.

Based on the 69 potentially finable OSHA violations we found at 28 statistically selected facilities,¹¹ we projected there are 13,480 potentially finable violations across the 5,470 retail facilities in the Southern Area. We recognize, based on historical trends, it is unlikely OSHA will inspect all facilities in the area. However, if the violations found at the sampled facilities were found at other retail facilities in the Southern Area, the potential expected monetary value of these violations for the entire area, at the average fine of \$2,100¹² per incident, would be about \$28.3 million. This represents the risk exposure and worst case scenario based on the issues identified.

Building Maintenance

The Postal Service must improve the maintenance of its retail facilities based on the following observations:¹³

- Nine facilities (13 percent) did not have appealing lobbies. The customer areas of these facilities had cobwebs, overflowing trash cans, dead bugs in light fixtures, cracks on the walls, or stained or chipped floor and ceiling tiles.
- Twenty-four facilities (34 percent) did not have a clean or well-maintained building. Issues included roof leaks; filthy exhaust or ventilation fans; dust visible on doors, ceiling fans, or lights; and dirty restrooms (see Figure 9). One facility had excessive bird droppings throughout the dock area.

Figure 9: Corroded Faucet



Source: OIG photograph, George West Post Office – George West, TX, dated September 26, 2016.

¹¹ We did not include the potentially finable OSHA violations we found at our 43 judgmentally selected sites.

¹² The average fine the Postal Service paid for OSHA violations related to our findings from 2012 to 2015.

¹³ Some facilities had multiple building appearance issues.

- Thirty-one facilities (44 percent) needed repair and maintenance of paint, plaster, walls, floors, and ceilings in the employee areas. These facilities had walls with holes, cracks, chipped paint or plaster; floors with holes, that were dirty, or needed repair; and stained, missing, or damaged ceiling tiles (see Figure 10).
- Twelve facilities (17 percent) did not take the American flag down at night or have it illuminated, as required.¹⁴
- Nine facilities (13 percent) required landscaping maintenance and removal of excess equipment, such as cluster boxes and utility carts. One facility had broken or unused equipment located on the side of the building, another had overgrown grass, and three had overgrown trees and bushes close to the front and rear of the building.
- Sixty-two facilities (87 percent) did not complete a quarterly housekeeping inspection as required¹⁵ (see Table 1).

Figure 10: Damaged Ceiling Tile



Source: OIG photograph, Jacksonville Post Office – Jacksonville, AR, dated October 13, 2016.

Table 1: Housekeeping Inspections

District	Performed	
	No	Yes
Alabama	2	1
Arkansas	3	0
Dallas	3	0
Fort Worth	2	0
Gulf Atlantic	2	1
Houston	28	4
Louisiana	3	0
Mississippi	5	1
Oklahoma	2	1
Rio Grande	10	0
South Florida	0	1
Suncoast	2	0
Total	62	9

Source: PS Form 4851 obtained from facility local staff, 2016.

¹⁴ *Administrative Support Manual* 13, Section 472.13, dated July 1999, updated with *Postal Bulletin* revisions through March 29, 2007.

¹⁵ *Handbook MS-47, Housekeeping Postal Facilities*, Chapter 5, June 1, 1983.

Conditions related to building security, safety, and maintenance occurred because:

- Local management did not always perform housekeeping inspections. Facilities of less than 25,000 square feet are required to perform quarterly self-assessments and maintenance managers are required to follow up yearly. District maintenance personnel did not consistently communicate the requirement for facilities to perform housekeeping inspections, stating that they only follow up with facilities if they are notified of an issue that needs to be addressed.
- Management at a facility with several deficiencies had a designated custodian who performed duties outside of his job description. Instead of focusing on the cleanliness and maintenance of the facility, the custodian assisted with the daily mailing expectations, such as sorting and delivering packages or Express Mail to another facility.
- Some maintenance deficiencies at Postal Service owned and leased facilities were reported in the eFMS; however, they were not addressed due to budget constraints or the lessor's failure to perform the work unless mandated through the landlord enforced maintenance process.¹⁶ For example, at one facility a roof leak occurred in June 2016. Although the facility reported the problem several times, the lessor had not repaired the roof; therefore, the Postal Service performed the work in December 2016. In addition, some needed repairs at owned facilities were not approved if they did not meet the criteria of safety, security, or serviceability.¹⁷
- Management did not always report maintenance, safety, and security deficiencies in eFMS or document issues on a Postal Service (PS) Form 4805, Maintenance Work Order Request, as required, to initiate resolution. Employees were either not properly trained to recognize and report deficiencies, assumed the deficiencies were previously reported, or chose not to address them.
- Employees did not always lower the flag at night or have it illuminated because they were either not properly trained on the requirement to lower the flag, did not notice the flag lights were not functioning, or staff previously responsible for flag duties no longer worked at the facility and management never reassigned the responsibility.
- Employees did not always perform monthly inspections or annual maintenance of fire extinguishers as required because management did not designate someone to complete the monthly inspections or did not contract certified technicians to conduct the annual maintenance. Additionally, management did not provide sufficient oversight to ensure the inspections were completed.
- The security camera at one facility was not operational. The postmaster reported the issue in eFMS in 2014 and the facility replaced the equipment in 2015; however, the postmaster never followed up with Facilities personnel to ensure it was properly installed. As a result, the dock security camera feed still did not display correctly. OIG auditors notified local management of this security deficiency and the problem was resolved after an additional maintenance call.

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

¹⁶ A process the Postal Service uses to resolve maintenance issues. When the lessor fails to respond to a maintenance request, the Postal Service can exercise its rights under the lease to perform the repairs and charge the cost back to the lessor.

¹⁷ Criteria used by the Facilities Repairs and Alterations group to effectively identify and prioritize workload to develop timely, quality, cost-effective solutions to meet postal operational needs.

We found that 46 of 71 facilities (65 percent) did not maintain a customer complaint log and 34 facilities (48 percent) did not monitor the timeliness of initial contact or final responses to customers.

instructs employees to promote housekeeping throughout the building and the surrounding area. The postmaster or postal facility manager is responsible for ensuring that custodial maintenance is satisfactory.¹⁸ Postal Service policy requires repair work to be entered into eFMS for tracking through the project manager, regardless of the dollar amount or the responsibility.¹⁹

Attention to these deficiencies could reduce the Postal Service's exposure to OSHA fines and penalties; improve employee morale and reduce turnover; and reduce the 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 affects revenue.

Customer Complaints

The Postal Service needs to improve procedures for monitoring local customer complaints. We found that 46 of 71 facilities (65 percent) did not maintain a customer complaint log and 34 facilities (48 percent) did not monitor the timeliness of initial contact or final responses to customers. These deficiencies occurred because the district ineffectively communicated log maintenance requirements to staff. In addition, personnel at some facilities could not locate the customer complaint log, claimed they did not receive any complaints, or that Remotely Managed Post Office (RMPO) staff forwarded complaints to management at the Administrative Post Office (APO).²⁰

The Postal Service requires facilities to maintain a customer complaint log and respond to complaints within a specified timeframe.²¹ Without such a log, it is difficult to determine whether customer complaints are being addressed in a timely manner or if they are ever resolved. This could negatively impact the Postal Service's goodwill and brand.

In our previous three reports on facility condition reviews,²² the OIG noted that all retail facilities do not maintain manual customer complaint logs. We recommended maintenance of customer complaint logs to record, track, and resolve customer complaints timely. In June 2016, the Postal Service sent a letter to all area vice presidents and district managers reinforcing the Postal Service's commitment to providing customers with the best experience possible, including being proactive and responsive in addressing field offices concerns. Management was directed to adhere to the policy regarding customer complaint logs;²³ however, we noted log maintenance issues still exist.

Workplace Environment and Violence

The Postal Service must improve its display of required information relating to workplace environment and violence and emergency preparedness.²⁴ Sixty-four facilities (90 percent) did not display workplace environment posters and 32 (45 percent) did not display workplace violence posters.

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

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

20 A post office that offers part-time window service hours, is staffed by a Postal Service employee at the direction of the postmaster, and reports to an APO.

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 one business day of receiving a complaint and issue a final response within three business days.

22 *Facility Condition Reviews – Capital Metro* (Report Number SM-AR-16-009, dated July 18, 2016); *Facility Condition Reviews – Great Lakes* (Report Number SM-AR-16-010, dated September 2, 2016), and *Facility Condition Reviews – Northeast* (Report Number SM-AR-17-001, dated November 9, 2016).

23 Management Instruction – PO-160-2014-1, Complaint Resolution and Proper Use of Notice 4314-C, September 1, 2014.

24 Some facilities were missing multiple posters.

Specifically, we observed the following:

- Forty-four facilities (62 percent) did not display OSHA posters 3165, *Job Safety and Health Protection* (in English), or 3167 (in Spanish).²⁵
- Forty-one facilities (58 percent) did not display Poster CA-10, *What a Federal Employee Should Do When Injured at Work*.²⁶
- Twenty-one facilities (30 percent) did not display the *Zero Tolerance Policy and Reporting Procedures* poster.²⁷
- Nineteen facilities (27 percent) did not display Poster 7, *Rules and Regulations Governing Conduct on Postal Property*.²⁸
- Fourteen facilities (20 percent) did not display the Fire Prevention Plan (FPP) as required at postal facilities with more than 10 employees.²⁹
- Eight facilities (11 percent) did not have emergency contact numbers by each phone or an alarm system.
- Twenty facilities (28 percent) did not display the OIG poster,³⁰ though it is not required.

The POM and EL-801 require management to post workplace environment information at each facility. For the facilities that did not display the required posters, staff members were not aware they were missing the poster and local management did not provide oversight to ensure all appropriate forms were displayed. Not displaying the required posters may leave employees unaware 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.

Handicap Accessibility

All facilities we visited complied with handicap accessibility requirements. However, there were loose and rotted boards on the handicap ramp at one facility, which made the ramp potentially unsafe. The Postal Service should continue its efforts to promote accessibility to employees and customers with disabilities.

²⁵ The OSHA poster outlines management and employee responsibilities and rights under OSHA.

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

²⁷ *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 posted in a conspicuous place. The poster identifies employee rights and management responsibilities for a work environment that is free of harassment and other inappropriate conduct such as discrimination.

²⁸ POM, Issue 9, Section 124, dated July 2002, 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.

²⁹ EL-801, *Supervisor's Safety Handbook*, Section 8-18 (c).

³⁰ OIG's *How to Report Fraud, Waste, and Abuse* poster.

Recommendations

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

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

1. Develop and implement an action plan to address all building safety, security, maintenance, workplace environment, and workplace violence policy issues identified during our review. This plan should include a timeline for completing items.
2. Reiterate policy with retail facilities to enter all applicable safety, security, and maintenance issues into electronic Facilities Management System (eFMS). For issues that do not involve eFMS, ensure local management completes a manual Postal Service Form 4805, Maintenance Work Order Request, and monitor the status of these issues until the problems are resolved and in “complete” status.

We recommend the vice president, Southern Area, in coordination with the vice president, Retail and Customer Service Operations:

3. Direct district managers to reiterate the requirement that local management maintain a customer complaint log as required by Management Instruction PO-160-2014-1, Complaint Resolution and Proper Use of Notice 4314-C, to help ensure customer complaints are recorded, tracked, and resolved timely.

We recommend the vice president, Southern Area:

4. Reiterate to maintenance managers the requirement of Handbook MS-47, *Housekeeping Postal Facilities*, to have all facilities perform housekeeping inspections.
5. Establish an oversight mechanism to ensure local management at retail facilities adhere to Postal Service policies and procedures relating to:
 - Maintenance and housekeeping standards to improve the customer retail experience.
 - Maintenance and inspection of fire extinguishers.
 - Security standards for facilities and vehicles to protect Postal Service employees, property, and the mail.
 - Consistent display of required posters so they are available to employees.

Management's Comments

Management agreed with our findings and recommendations but disagreed with the methodology used to determine the other impact amount of \$28,308,000 related to physical safety and security concerns.

Regarding recommendation 1, management agreed to develop an action plan to address all outstanding building maintenance, safety, security, and workplace environment issues referenced in our report. The plan will include a timeline for completing the remaining items. The target implementation date is June 1, 2017.

Regarding recommendation 2, management will reissue the policy for retail facilities to enter applicable safety, security, and maintenance issues into the eFMS. This policy instructs local management to complete a manual PS Form 4805 and monitor the status of issues until they are resolved and annotated as completed in the eFMS. The target implementation date is May 5, 2017.

Regarding recommendation 3, area management will direct district managers to reissue the requirement that local management maintain a customer complaint log as required to help ensure timely recording, tracking, and resolution of complaints. The target implementation date is May 5, 2017.

Regarding recommendation 4, management will issue a letter to the field reaffirming the requirements for conducting housekeeping inspections. The target implementation date is May 5, 2017.

Regarding recommendation 5, management will reissue the housekeeping requirements per Handbook MS-47 to include standards for improving the customer retail experience and requirements for maintaining and inspecting fire extinguishers. Management will also require districts to review and update all offices on the Vulnerability and Risk Assessment Tool, which evaluates vulnerabilities of the site, facility, security system, registry/remittance, policy and procedure, information technology, and personnel. Finally, all offices will be provided a diagram of required postings and certify that they have posted all required material. The target implementation date is May 20, 2017.

Management disagreed with the methodology used to determine the other impact, stating that research found no instances in the past five years of the Postal Service being assessed OSHA fines due to missing posters. For findings related to asbestos-associated risk, management stated they did not test for or confirm the presence of asbestos. Management also stated that while there were no findings at 11 percent of the sites we reviewed, we projected the findings across all 5,470 Southern Area retail facilities without considering the 11 percent with no findings. Management further stated that the \$28.3 million does not appear realistic because in FY 2016, the Postal Service was assessed \$778,650 for 129 citations at 403 facilities.

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

Evaluation of Management's Comments

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

Regarding the other impact, while the missing OSHA posters may not have resulted in actual fines in the past, we noted the violations are "potentially" finable based on OSHA criteria. In addition, regarding the asbestos-associated risk, we noted "possible" asbestos exposure only at facilities with asbestos-labeled floor tiles and walls that were cracked or damaged in the area of the asbestos label.

The OIG calculated the \$28.3 million in other impact using a valid statistical sample of retail facilities in the Southern Area and a sound methodology based on average fines the Postal Service paid between 2012 and 2015 for OSHA violations related to issues observed during this audit. We projected the occurrence rate of finable violations across all retail facilities in the Southern Area but noted that it is unlikely that OSHA will inspect all facilities. The other impact represents risk exposure and worst case scenario based on the issues identified.

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

*Click on the appendix title
to the right to navigate
to the section content.*

Appendix A: Additional Information.....	18
Background	18
Objective, Scope, and Methodology	18
Prior Audit Coverage.....	21
Appendix B: Fieldwork Observation Summary	22
Appendix C: Assist Work Observation Summary	25
Appendix D: Management’s Comments	29

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 Southern Area has 5,470 retail facilities – 3,825 of them are leased and 1,586 are owned. 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 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, 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.

This is the fourth in a series of audits assessing retail facility conditions 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 in the Southern Area.

To accomplish our objective we:

- Statistically sampled 28 facilities in 12 districts in the Southern Area.
- Conducted unannounced site visits during September and October 2016 at all 28 statistically selected facilities; and reviewed 43 additional facilities based on work conducted by OIG auditors from other directorates, referrals, and Hotline complaints (see [Table 2](#)).
- Used an OIG-developed checklist focusing 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)³¹ 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 An external application used by Facilities building inspectors to assess the condition of postal facility structures and their associated building systems.

Table 2: Facilities Visited in the Southern Area

District	Leased/ Owned	Unit Name	City, State
Alabama	Leased	Coaling Main Post Office (MPO)	Coaling, AL
Alabama	Leased	Pine Apple MPO	Pine Apple, AL
Alabama	Owned	Green Springs Carrier Annex	Birmingham, AL
Arkansas	Leased	Jacksonville MPO	Jacksonville, AR
Arkansas	Leased	Parkin MPO	Parkin, AR
Arkansas	Owned	Hamburg MPO	Hamburg, AR
Dallas	Leased	Dallas Station A MPO*	Dallas, TX
Dallas	Leased	Lake Creek PO	Lake Creek, TX
Dallas	Leased	Streetman MPO	Streetman, TX
Fort Worth	Owned	Godley MPO	Godley, TX
Fort Worth	Owned	Voca MPO/Modular Building	Voca, TX
Gulf Atlantic	Leased	Saint Marks MPO	Saint Marks, FL
Gulf Atlantic	Leased	Waverly Hall MPO	Waverly Hall, GA
Gulf Atlantic	Leased	Westville MPO	Westville, FL
Houston	Leased	Houston Jensen Drive Station*	Houston, TX
Houston	Leased	Port Bolivar MPO	Port Bolivar, TX
Houston	Owned	Beaumont Tobe Hahn*	Beaumont, TX
Houston	Owned	Houston Ashford West*	Houston, TX
Houston	Owned	Houston Cornerstone Station*	Houston, TX
Houston	Owned	Houston Denver Harbor Station*	Houston, TX
Houston	Owned	Houston Eastwood Station*	Houston, TX
Houston	Owned	Houston Granville W Elder Station*	Houston, TX
Houston	Owned	Houston James S. Griffith Station*	Houston, TX
Houston	Owned	Houston Medical Center Station*	Houston, TX
Houston	Owned	Houston Memorial Park Station*	Houston, TX
Houston	Owned	Houston North Shepherd*	Houston, TX
Houston	Owned	Houston Oak Forest Station*	Houston, TX
Houston	Owned	Houston Rich Hill Station*	Houston, TX
Houston	Owned	Houston University Station*	Houston, TX
Houston	Owned	Houston Westfield Station*	Houston, TX
Houston	Owned	Houston Windmill Station*	Houston, TX
Houston	Owned	Houston-De Moss Station*	Houston, TX
Houston	Owned	Humble MPO*	Humble, TX
Houston	Owned	Lake Jackson MPO*	Lake Jackson, TX
Houston	Owned	League City MPO*	League City, TX
Houston	Owned	Magnolia MPO*	Magnolia, TX
Houston	Owned	Orange MPO*	Orange, TX
Houston	Owned	Pasadena Delbert L. Atkinson Station*	Pasadena, TX

District	Leased/ Owned	Unit Name	City, State
Houston	Owned	Richmond MPO*	Richmond, TX
Houston	Owned	Rosenberg MPO*	Rosenberg, TX
Houston	Owned	Spring Klein Station*	Spring, TX
Houston	Owned	Spring Panther Creek*	Spring, TX
Houston	Owned	Spring Woodlands Metro Center*	Spring, TX
Houston	Owned	Stafford MPO*	Stafford, TX
Houston	Owned	Sugar Land First Colony Station*	Sugar Land, TX
Houston	Owned	Sugar Land MPO*	Sugar Land, TX
Louisiana	Leased	Downsville MPO	Downsville, LA
Louisiana	Owned	Bogalusa MPO	Bogalusa, LA
Louisiana	Owned	Mittie MPO/Modular Building	Mittie, LA
Mississippi	Leased	Hernando MPO*	Hernando, MS
Mississippi	Owned	Fulton MPO	Fulton, MS
Mississippi	Owned	Jackson MPO*	Jackson, MS
Mississippi	Owned	Lexington MPO	Lexington, MS
Mississippi	Owned	Meridian North Station*	Meridian, MS
Mississippi	Owned	Starkville MPO*	Starkville, MS
Oklahoma	Leased	Hunter MPO	Hunter, OK
Oklahoma	Leased	Pocola MPO	Pocola, OK
Oklahoma	Owned	Wainwright MPO/Modular Building	Wainwright, OK
Rio Grande	Leased	Briggs MPO	Briggs, TX
Rio Grande	Leased	George West MPO	George West, TX
Rio Grande	Owned	Austin Chimney Corners Station*	Austin, TX
Rio Grande	Owned	Austin Southeast Station*	Austin, TX
Rio Grande	Owned	Austin-Balcones Station*	Austin, TX
Rio Grande	Owned	Austin-Lake Travis Branch	Lake Way, TX
Rio Grande	Owned	Austin-South Congress Station*	Austin, TX
Rio Grande	Owned	El Paso Coronado Station*	El Paso, TX
Rio Grande	Owned	Georgetown MPO*	Georgetown, TX
Rio Grande	Owned	Temple MPO*	Temple, TX
South Florida	Leased	Miami Springs Branch	Miami, FL
Suncoast	Leased	Bushnell MPO	Bushnell, FL
Suncoast	Owned	Venus MPO	Venus, FL

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

We conducted this performance audit from September 2016 through April 2017, 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 March 10, 2017, 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 (in millions)
<i>Facility Condition Reviews – Capital Metro Area</i>	Determine if Postal Service management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities in the Capital Metro Area.	SM-AR-16-009	7/18/2016	None
<i>Facility Condition Reviews – Great Lakes Area</i>	Determine if Postal Service management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities in the Great Lakes Area.	SM-AR-16-010	9/2/2016	None
<i>Facility Condition Reviews – Northeast Area</i>	Determine if Postal Service management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities in the Northeast Area.	SM-AR-17-001	11/9/2016	\$10.6

Appendix B: Fieldwork Observation Summary

District	Alabama			Arkansas			Dallas		Fort Worth		Gulf Atlantic			Houston	Louisiana			Mississippi			Oklahoma			Rio Grande			South Florida	Suncoast		Totals			
Facility	Pine Apple	Coaling Post Office	Green Spgs Carrier Annex	Parkin Post Office	Hamburg PO	Jacksonville AR PO	Streetman, TX	Lake Creek PO	Voca MPO	Godley TX PO	Waverly Hall, GA	Westville, FL	Saint Marks, FL	Port Bolivar	Downsville	Mitte	Bogalusa	Lexington	Fulton MS PO	Hunter OK PO	Pocola OK PO	Wainwright PO	Lake Travis Branch, TX	George West TX	Briggs Main Office	Miami Springs Branch	Bushnell	Venus	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency Percentage	
Building Appearance																																	
Is the building clean and well maintained?	✓	✓	✓	✓	✓	✓	✓	D	D	D	✓	D	✓	D	✓	✓	D	✓	✓	✓	D	✓	✓	✓	D	D	D	17	11	12	39%		
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	D	D	11	17	12	61%		
Is the lobby inviting?	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	25	3	12	11%	
Is landscaping well maintained and is all excessive equipment removed from the facility?	✓	D	✓	D	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	X ¹	D	✓	22	5	13	18%	
Is there sufficient lighting inside/outside the facility?	D	D	D	D	D	✓	✓	D	✓	D	✓	D	✓	D	D	D	✓	✓	✓	D	✓	D	✓	✓	✓	✓	✓	D	13	15	12	54%	
Are docks, platforms, and parking areas properly marked?	X ²	✓	D	D	✓	D	D	D	✓	D	✓	D	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	X ¹	✓	D	16	10	14	36%	
Building Safety and Security																																	
Are non-retail doors of the facility secured and are all vehicles locked and empty of mail?	✓	✓	D	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	25	3	12	11%
Is the building free of obvious OSHA safety hazards?	D	D	D	D	D	D	D	D	✓	✓	D	D	D	D	D	D	D	✓	✓	D	D	D	D	D	✓	D	D	D	5	23	12	82%	
Are there other safety concerns?	✓	✓	D	✓	D	✓	✓	✓	✓	✓	D	D	✓	D	D	D	✓	✓	✓	✓	✓	✓	D	D	✓	D	✓	D	16	12	12	43%	
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	9	19	12	68%		
Are all initial contacts and final responses with the customer made within required timeframes, after receiving the comment or complaint?	D	✓	X ¹	D	D	D	✓	D	D	D	✓	D	D	D	D	✓	✓	D	✓	D	✓	D	D	✓	D	D	D	8	19	12	68%		

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

District	Alabama			Arkansas			Dallas	Fort Worth		Gulf Atlantic			Houston	Louisiana			Mississippi		Oklahoma			Rio Grande			South Florida	Suncoast		Totals					
Facility	Pine Apple	Coaling Post Office	Green Spgs Carrier Annex	Parkin Post Office	Hamburg PO	Jacksonville AR PO	Streetman, TX	Lake Creek PO	Voca MPO	Godley TX PO	Waverly Hall, GA	Westville, FL	Saint Marks, FL	Port Bolivar	Downsville	Mittie	Bogalusa	Lexington	Fulton MS PO	Hunter OK PO	Pocola OK PO	Wainwright PO	Lake Travis Branch, TX	George West TX	Briggs Main Office	Miami Springs Branch	Bushnell	Venus	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency Percentage	
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	10	18	12	64%
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	13	15	12	54%
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	✓	D	✓	20	1	19	4%		
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	D	X ¹	✓	D	✓	X ¹	✓	✓	✓	X ¹	X ¹	X ¹	✓	✓	D	✓	X ¹	X ¹	X ¹	✓	X ¹	✓	X ¹	D	✓	11	4	25	14%		
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	✓	15	13	12	46%		
Although not required, does the facility have an OIG poster displayed?	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	D	24	4	12	14%	
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	18	10	12	36%	

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

District	Alabama			Arkansas			Dallas		Fort Worth		Gulf Atlantic			Houston	Louisiana			Mississippi		Oklahoma			Rio Grande			South Florida	Suncoast		Totals						
Facility	Pine Apple	Coaling Post Office	Green Spgs Carrier Annex	Parkin Post Office	Hamburg PO	Jacksonville AR PO	Streetman, TX	Lake Creek PO	Voca MPO	Godley TX PO	Waverly Hall, GA	Westville, FL	Saint Marks, FL	Port Bolivar	Downsville	Mittie	Bogalusa	Lexington	Fulton MS PO	Hunter OK PO	Pocola OK PO	Wainwright PO	Lake Travis Branch, TX	George West TX	Briggs Main Office	Miami Springs Branch	Bushnell	Venus	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency Percentage			
Does the facility have a 7 Rules and Regulations Governing Conduct on Postal Property poster displayed?	✓	D	D	✓	✓	✓	✓	✓	✓	✓	D	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	D	✓	✓	22	6	12	21%			
Other																																			
Is the facility handicap accessible?	✓	✓	✓	✓	✓	✓	X ¹	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	27	0	13	0%
Totals																																			
No Issue	11	9	10	13	12	12	10	16	13	12	6	11	9	13	12	13	18	13	16	10	14	12	10	17	6	10	8								
Deficiency	6	10	9	7	8	6	8	4	7	7	13	7	10	7	8	7	2	6	3	9	4	8	9	2	11	10	12								
Not Applicable or Not Observed	3	1	1	0	0	2	2	0	0	1	1	2	1	0	0	0	0	1	1	1	2	0	1	1	3	0	0								

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

Appendix C: Assist Work Observation Summary

District	Houston																																
Facility	Pasadena Delvert L Atkinson	James Griffith Station	Spring Woodlands Metro Ctr	Sugar Land First Colony	Sugar Land Main Office	Beaumont Tobe Hahn	De Moss	Granville W Elder Sta	Ashford West	Cornerstone	Denver Harbor	Eastwood Station	North Shepherd	Westfield Station	Windmill Station	Humble Main Office	Jensen Drive Station	Lake Jackson Main Office	League City Main Office	Medical Center Station	Memorial Park Station	Oak Forest Station	Orange Main Office	Rich Hill Station	Richmond Main Office	Rosenberg MPO	Spring Klein Station	Spring Panther Creek	Stafford Main Office	University Station	Magnolia Main Office		
Building Appearance																																	
Is the building clean and well maintained?	✓	✓	D	✓	D	D	✓	✓	D	✓	✓	D	✓	✓	✓	D	✓	✓	✓	✓	✓	D	✓	✓	D	D	✓	✓	D	✓	D		
Are paint, plaster, wall, floor, and ceiling coverings in good condition?	✓	✓	D	✓	D	✓	✓	✓	D	✓	D	D	✓	✓	✓	D	D	✓	✓	✓	D	D	D	✓	D	✓	✓	✓	D	✓	D		
Is the lobby inviting?	✓	✓	✓	✓	D	D	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	D		
Is landscaping well maintained and is all excessive equipment removed from the facility?	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	D	✓	✓	✓	✓	X ¹	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	D		
Is there sufficient lighting inside/outside the facility?	✓	✓	D	✓	✓	✓	✓	✓	D	D	D	D	✓	✓	✓	✓	D	✓	D	✓	✓	✓	✓	✓	✓	D	✓	✓	D	✓	D		
Are docks, platforms, and parking areas properly marked?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	D
Building Safety and Security																																	
Are non-retail doors of the facility secured and are all vehicles locked and empty of mail?	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	X ²	X ²	✓	D	✓	✓	X ²	✓	✓	✓	✓	✓	✓	X ²	✓	✓	D	✓	✓	D		
Is the building free of obvious OSHA safety hazards?	✓	✓	✓	✓	D	✓	✓	✓	D	✓	✓	✓	✓	D	✓	✓	✓	✓	D	✓	✓	D	✓	✓	✓	✓	D	✓	✓	✓	✓	D	
Are there other safety concerns?	D	D	✓	✓	D	D	✓	✓	✓	X ²	✓	✓	✓	D	✓	D	✓	X ²	✓	✓	✓	✓	D	✓	X ²	D	D	D	✓	✓	D		
Customer Complaints																																	
Are one or more customer complaint control logs maintained at the facility?	D	D	✓	✓	D	✓	D	D	D	D	X ²	D	✓	✓	D	D	D	D	D	✓	✓	D	D	D	D	✓	X ¹	X ¹	D	D	D		
Are all initial contacts and final responses with the customer made within required timeframes, after receiving the comment or complaint?	D	X ²	X ²	D	D	X ²	✓	D	D	X ²	X ¹	X ¹	D	✓	X ²	X ¹	D	X ¹	X ²	✓	✓	X ²	D	X ¹	D	X ²	X ¹	X ¹	D	D	D		
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		
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	D	D	D	X ²	✓	D	✓	D	D		
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?	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	D	✓	D	D	D	✓	✓	✓	✓	✓	✓	✓	✓	
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?	✓	D	D	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	D	✓	D	✓	D	D	✓	D	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	

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

District

Houston

Facility	Pasadena Delvert L Atkinson	James Griffith Station	Spring Woodlands Metro Ctr	Sugar Land First Colony	Sugar Land Main Office	Beaumont Tobe Hahn	De Moss	Granville W Elder Sta	Ashford West	Cornerstone	Denver Harbor	Eastwood Station	North Shepherd	Westfield Station	Windmill Station	Humble Main Office	Jensen Drive Station	Lake Jackson Main Office	League City Main Office	Medical Center Station	Memorial Park Station	Oak Forest Station	Orange Main Office	Rich Hill Station	Richmond Main Office	Rosenberg MPO	Spring Klein Station	Spring Panther Creek	Stafford Main Office	University Station	Magnolia Main Office		
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	
Although not required, does the facility have an OIG poster displayed?	✓	D	D	✓	✓	✓	D	D	D	D	D	✓	D	✓	D	D	✓	✓	D	✓	✓	✓	D	D	X ²	✓	D	✓	✓	✓	✓	✓	
Workplace Violence																																	
Does the facility have the Zero Tolerance Policy and Reporting Procedures poster displayed?	✓	✓	D	✓	D	D	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	D	D	✓	D	✓	D	✓	✓	✓	✓	✓	✓	D	✓	✓
Does the facility have a 7 Rules and Regulations Governing Conduct on Postal Property poster displayed?	✓	D	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	D	✓	D	✓	✓	✓	✓	D	✓	D	D	D	✓	✓	D	D	✓	✓	✓	✓	
Other																																	
Is the facility handicap accessible?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Totals																																	
No Issue	16	11	10	17	11	13	17	16	8	12	14	11	14	17	10	13	12	16	11	14	17	10	10	11	12	14	12	13	12	17	6		
Deficiency	4	8	9	3	9	6	3	4	12	6	4	7	5	3	9	6	7	1	8	6	3	9	10	8	4	5	6	5	8	3	14		
Not Applicable or Not Observed	0	1	1	0	0	1	0	0	0	2	2	2	1	0	1	1	1	3	1	0	0	1	0	1	4	1	2	2	0	0	0		

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

District	Mississippi				Rio Grande							Dallas	Totals			
	Jackson MPO	Meridian North Station	Starkville Main Office	Hernando Main Office	El Paso Coronado Station	Austin South Congress Station	Austin Southeast Station	Georgetown Post Office	Temple Main Office	Austin Balcones Station	Austin Chimney Corners Station	Dallas - Station A	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
Facility																
Building Appearance																
Is the building clean and well maintained?	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	D	30	13	0	30%
Are paint, plaster, wall, floor, and ceiling coverings in good condition?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	29	14	0	33%
Is the lobby inviting?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	37	6	0	14%
Is landscaping well maintained and is all excessive equipment removed from the facility?	✓	✓	✓	✓	✓	D	D	✓	✓	D	✓	✓	35	7	1	16%
Is there sufficient lighting inside/outside the facility?	✓	✓	✓	D	X ²	✓	D	✓	✓	D	✓	✓	29	13	1	30%
Are docks, platforms, and parking areas properly marked?	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	D	37	6	0	14%
Building Safety and Security																
Are non-retail doors of the facility secured and are all vehicles locked and empty of mail?	✓	✓	✓	✓	X ²	✓	D	✓	✓	D	✓	D	31	7	5	16%
Is the building free of obvious OSHA safety hazards?	✓	✓	X ²	D	✓	✓	✓	✓	✓	✓	✓	D	33	9	1	21%
Are there other safety concerns?	✓	✓	✓	D	✓	D	D	✓	✓	D	D	D	23	17	3	40%
Customer Complaints																
Are one or more customer complaint control logs maintained at the facility?	D	✓	✓	D	D	D	✓	D	✓	✓	D	D	13	27	3	63%
Are all initial contacts and final responses with the customer made within required timeframes, after receiving the comment or complaint?	✓	✓	✓	D	D	✓	✓	✓	✓	✓	✓	D	13	15	15	35%
Workplace Environment																
CA-10, What a Federal Employee Should Do When Injured at Work. Is the CA-10 posted for review by employees?	X ²	✓	✓	D	D	D	D	✓	D	D	D	D	20	22	1	51%
Are the 3165 (English) and 3167 (Spanish) OSHA Posters on display?	✓	✓	✓	D	D	D	D	D	D	D	D	✓	12	30	1	70%
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 ²	✓	✓	✓	D	✓	✓	✓	✓	✓	35	7	1	16%
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 ²	✓	X ²	✓	✓	✓	D	✓	✓	✓	✓	✓	31	10	2	23%
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?	✓	✓	X ²	✓	✓	✓	D	✓	D	D	✓	✓	29	13	1	30%
Although not required, does the facility have an OIG poster displayed?	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	D	26	16	1	37%
Workplace Violence																
Does the facility have the Zero Tolerance Policy and Reporting Procedures poster displayed?	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	D	32	11	0	26%

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

District	Mississippi				Rio Grande								Dallas	Totals			
	Jackson MPO	Meridan North Station	Starkville Main Office	Hernando Main Office	El Paso Coronado Station	Austin South Congress Station	Austin Southeast Station	Georgetown Post Office	Temple Main Office	Austin Balcones Station	Austin Chimney Corners Station	Dallas - Station A	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %	
Facility																	
Does the facility have a 7 Rules and Regulations Governing Conduct on Postal Property poster displayed?	✓	✓	✓	✓	✓	✓	D	D	D	✓	✓	✓	30	13	0	30%	
Other																	
Is the facility handicap accessible?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	43	0	0	0%	
Totals																	
No Issue	17	20	16	11	14	14	12	13	18	13	15	8					
Deficiency	1	0	0	9	4	6	8	7	2	7	5	12					
Not Applicable or Not Observed	2	0	4	0	2	0	0	0	0	0	0	0					

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

Appendix D: Management's Comments



April 21, 2017

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Facility Condition Reviews – Southern Area
Report Number SM-AR-17-DRAFT

Thank you for the opportunity to respond to the *Facility Condition Reviews –Southern Area* report. Management agrees with this audit's findings and recommendations as they pertain to the importance of maintaining safe and clean working environments.

The Southern Area does not agree with the methodology used to assess the "Other Impact" risk exposure of \$28,308,000 as:

- Missing OSHA posters were cited in 14 of 69 (20%) findings, but research could not find any instances, in the past five years, of OSHA fines assessed due to missing posters in the Postal Service.
- Findings were listed for asbestos associated risk, but the presence of asbestos was either not tested or listed as confirmed.
- There were no findings at 3 of 28 (11%) sites reviewed; however, findings were applied across all 5,470 Southern Area Retail facilities without consideration given for the previously cited 11% without findings.
- The \$28.3 million impact does not appear to be realistic. In FY 2016, the Postal Service was assessed \$778,650 for 129 citations for 403 facilities.

Recommendation 1:

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

Management Response/Action Plan:

The Southern Area, in coordination with Facilities as appropriate, will implement this recommendation, and develop an action plan to address all outstanding building maintenance, safety, security, and workplace environment issues in the 25 facilities referenced in the report. The plan will include the specific items remaining and a timeline for completion of each identified item.

Target Implementation Date:

June 1, 2017

Responsible Officials:

Lisa A. Syse, Facilities, Customer Relations Manager
Gi Gi Griffin-Earnest, Manager, Maintenance Operations, Southern Area
Dan Penland, Manager, Safety, Southern Area

Recommendation 2:

Reissue policy with retail facilities to enter all applicable safety, security, and maintenance issues into electronic Facilities Management System (eFMS). For issues that do not involve eFMS, ensure local management complete a manual PS Form 4805, Maintenance Work Order Request, and monitor the status of these issues until the problems are resolved and in "complete" status.

Management Response/Action Plan:

Southern Area will reissue the policy for retail facilities to enter all applicable safety, security, and maintenance issues into electronic Facilities Management System (eFMS). The policy instructs local management of the requirement to complete a manual PS Form 4805 Maintenance Work Order Request and to monitor the status of these issues until the problems are resolved and annotated as completed in the electronic Facilities Management System (eFMS).

Target Implementation Date:

May 5, 2017

Responsible Official:

Shaun E. Mossman, Vice President Southern Area

Recommendation 3:

Direct District Managers to reissue the requirement that local management maintain a customer complaint log as required by Management Instruction PO-160-2014-1, Complaint Resolution and Proper Use of Notice 4314-C, to help ensure customer complaints are recorded, tracked, and resolved timely.

Management Response/Action Plan:

Southern Area will instruct District Managers to reissue the requirement that local management maintain a customer complaint log as required by Management Instruction PO-160-2014-1, Complaint Resolution and Proper Use of Notice 4314-C, to help ensure customer complaints are recorded, tracked, and resolved timely.

Target Implementation Date:

May 5, 2017

Responsible Official:

Shaun E. Mossman, Vice President Southern Area

Recommendation 4:

Reissue to Maintenance Managers the requirement of Handbook MS-47, Housekeeping Postal Facilities, to have all facilities perform housekeeping inspections.

Management Response/Action Plan:

Southern Area will issue a letter to the field that reaffirms the requirements for conducting Housekeeping Inspections per Handbook MS 47.

Target Implementation Date:

May 5, 2017

Responsible Official

Gi Gi L. Griffin-Earnest, Manager, Maintenance Operations, Southern Area

Recommendation 5:

Certify local management at retail facilities have received stand up talk on the Postal Service policies and procedures relating to:

- Maintenance and housekeeping standards to improve the customer retail experience.
- Adhere to USPS policy whereas fire extinguisher maintenance and inspections are fulfilled via fire extinguisher company representative or a certified contractor.
- Security standards for facilities and vehicles to protect Postal Service employees, property, and the mail.
- Consistent display of required posters so they are available to employees.

Management Response/Action Plan:

Southern Area will reissue to management at retail facilities the requirements of housekeeping per Handbook MS 47 to include standards for improving the customer retail experience, maintenance and inspection of fire extinguishers.

Southern Area will require all Districts to review and update all offices in the Vulnerability and Risk Assessment Tool (VRAT). The VRAT assessment will evaluate vulnerabilities of the site, facility, security system, registry/remittance, policy and procedure, information technology, and personnel. Identified risks will be corrected.

All offices will be provided with a unified diagram of required postings and be required to certify that they have posted all required material.

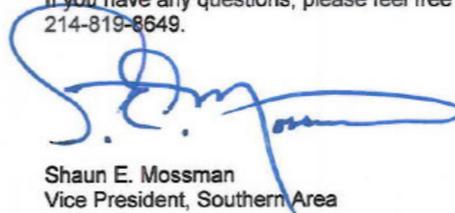
Target Implementation Date:

May 20, 2017

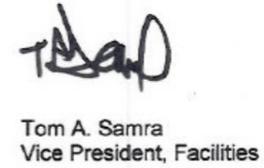
Responsible Official

Gi Gi L. Griffin-Earnest, Manager, Maintenance Operations, Southern Area
Dan Penland, Manager, Safety, Southern Area
Lisse Fish, Manager, Delivery Programs Support, Southern Area
Mangala Gandhi, Manager, Human Resources, Southern Area

If you have any questions, please feel free to contact Ray Vincent, Accounting Manager, at 214-819-8649.



Shaun E. Mossman
Vice President, Southern Area



Tom A. Samra
Vice President, Facilities

cc: Kelly Sigmon, Vice President Retail and Customer Service
Sally K. Haring, Manager, Corporate Audit Response Management
Lisa A. Syse, Facilities Customer Relations Manager
GiGi Griffin-Earnest, Manager, Maintenance Operations, Southern Area
Dan Penland, Manager, Safety, Southern Area
Lisse Fish, Manager, Delivery Programs Support, Southern Area
Mangala Gandhi, Manager, Human Resources,
Ray Vincent, Accounting Manager, Southern Area



Contact us via our [Hotline](#) and [FOIA](#) forms.
Follow us on social networks.
Stay informed.

1735 North Lynn Street
Arlington, VA 22209-2020
(703) 248-2100