



OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Facility Condition Reviews – Eastern Area

Audit Report

Report Number
SM-AR-17-004

May 10, 2017





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UNITED STATES POSTAL SERVICE

Highlights

***Thirty-two facilities
(63 percent) had potential
OSHA violations.***

Background

The U.S. Postal Service has more than 30,000 leased and owned retail facilities nationwide. Over 5,800 of these facilities are in the Eastern 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 51 facilities in the Eastern Area and assessed items related to building safety, security, maintenance, customer complaints, workplace environment, and workplace violence. We also assessed whether each facility was handicap accessible.

This is the fifth 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 51 facilities and found:

- Thirty-two facilities (63 percent) had building safety and security issues;
- Thirty-two facilities (63 percent) had potential OSHA violations;
- Twenty-five facilities (49 percent) had cleanliness and maintenance issues;
- Thirty-five (69 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved;
- Forty-four facilities (86 percent) did not display workplace environment posters such as those that inform employees what to do when injured at work;
- Twenty-four facilities (47 percent) did not display workplace violence posters, such as *Zero Tolerance Policy and Reporting Procedures*; and,
- Five facilities (10 percent) did not provide handicap accessibility or handicap areas needed maintenance or repairs.

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



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

Attention to these areas could improve employee morale and reduce employee turnover. It could 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 took corrective action by immediately addressing certain deficiencies brought to their attention during our site visits, such as displaying many missing posters and unblocking exits.

What the OIG Recommended

We recommended management develop and implement an action plan to address all building safety, security, maintenance, workplace environment, workplace violence policy, and handicap accessibility issues identified during our audit; direct retail facilities personnel to timely input all applicable safety, security, and maintenance issues into the electronic Facilities Management System; establish an oversight mechanism to ensure compliance with recording, tracking and the timely resolution of customer complaints; and reiterate the requirements to perform housekeeping inspections.

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; reinforce safety inspection policies and procedures, provide training, and establish an oversight mechanism to ensure safety inspections are completed accurately and deficiencies are addressed.



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We reviewed 51 facilities and found:

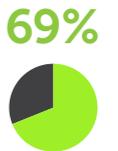
32
Facilities

had building safety and security issues



35
Facilities

did not maintain a customer complaint log or monitor how promptly complaints are resolved



32
Facilities

had potential OSHA violations



44
Facilities

did not display workplace environment posters such as those that inform employees what to do when injured at work



25
Facilities

had cleanliness and maintenance issues



24
Facilities

did not display workplace violence posters, such as *Zero Tolerance Policy and Reporting Procedures*



5
Facilities

did not provide handicap accessibility or handicap areas needed maintenance or repairs



Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

May 10, 2017

MEMORANDUM FOR: JOSHUA D. COLIN, PhD.
ASSISTANT VICE PRESIDENT, EASTERN 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 – Eastern Area
(Report Number SM-AR-17-004)

This report presents the results of Facility Condition Reviews – Eastern Area
(Project Number 17SMG004SM000).

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

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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.

Introduction

This report presents the results of our self-initiated audit of facility condition reviews in the Eastern Area (Project Number 17SMG004SM000). 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 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 and security and the appearance of lobbies and facilities. It has more than 30,000 leased and owned retail facilities nationwide, 5,875 of which are in the Eastern 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 fifth in the series — we visited 23 statistically sampled and 28 judgmentally selected facilities.²

Summary

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

- Thirty-two facilities (63 percent) had building security and safety issues;
- Thirty-two facilities (63 percent) had potential OSHA violations;
- Twenty-five facilities (49 percent) had cleanliness and maintenance and issues;
- Thirty-five (69 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved;
- Forty-four facilities (86 percent) did not display workplace environment posters such as those that inform employees what to do when injured at work;
- Twenty-four facilities (47 percent) did not display workplace violence posters, such as *Zero Tolerance Policy and Reporting Procedures*; and
- Five facilities (10 percent) did not provide handicap accessibility or the handicap areas needed maintenance or repairs.

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

² We judgmentally selected 28 facilities based on proximity to other statistically selected facilities, congressional inquiries, and work performed by other OIG teams.

³ Some facilities may have more than one issue cited.

Issues related to building security, safety, 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 security, safety, and maintenance occurred because of competing priorities and local management's failure to focus on cleaning, general maintenance and repairs, and housekeeping inspections.⁴ In addition, management did not provide sufficient oversight of, communicate with, or train employees effectively regarding requirements for reporting deficiencies; completing inspections and facility maintenance; the need to maintain a customer complaint log; or the need to display required posters.

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 impacts revenue.

Local management took corrective action by immediately addressing certain deficiencies brought to their attention during our site visits, such as displaying many missing posters and unblocking exits.

Building Security, Safety, and Maintenance

The Postal Service must improve the security, safety, and maintenance of its retail facilities in the Eastern Area. During our site visits, we assessed the exterior and interior conditions of 51 postal facilities and observed the following:⁵

Building Security

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

- Two facilities (4 percent) had received threats from customers that were not properly addressed.
 - At one facility, the employee was unable to lower the security window separating the lobby side of the customer service counter from the employee side without entering the customer area. By providing a mechanism to reach the security window from the employee side of the counter, the employee would have additional protection.
 - At another facility, after an employee received death threats from a customer, facility personnel allowed a highway contract driver to sleep in the back room of the post office during his daily layover in order for the employee to feel secure. Although the Postal Inspection Service addressed the issue by informing the customer they were no longer welcome at the facility, allowing a contractor to sleep in the facility creates potential liability and security issues.
- Two facilities (4 percent) did not prevent public access to employee work areas that should have been secured. The side doors of the facility were unlocked and unmonitored, allowing unrestricted access.
- One facility (2 percent) had an unsecured vault room with loose cash and an unlocked cash drawer on top of an unsecured safe, which contained locked cash drawers (see Figure 1).

Figure 1. Unsecured Cash Drawer in Unsecured Vault Room



Source: OIG photograph taken November 29, 2016, Williamsburg Post Office, Williamsburg, KY.

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

⁵ Some facilities had multiple issues.

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

Building Safety

The Postal Service must improve the safety of its retail facilities. Specifically:

- Twenty-two facilities (43 percent) had fire extinguishers that were not inspected monthly and annually, as required, or were missing.⁷ One facility had fire extinguishers that had not been inspected since 1999, while another had an inoperable fire extinguisher and a broken mounting bracket (see Figure 2).
- Eleven facilities (22 percent) had blocked electrical panels and exposed or hanging wires.
- Ten facilities (20 percent) had blocked emergency exits or exits that were not properly marked. One facility's exit was secured with a wood brace and required a skeleton key to unlock it and another facility had an exit blocked with a mattress (see Figures 3 and 4).
- Eight facilities (16 percent) had potential mold and asbestos exposure.⁸
- Eight facilities (16 percent) had trip hazards in the customer and employee areas (see Figure 5).
- Three facilities (6 percent) had lighting issues such as bulbs needing replacement or missing light covers.
- Two facilities (4 percent) had sanitary issues such as clogged sinks with no hot water, poorly maintained bathrooms, and peeling floors (see Figures 6 and 7).
- One facility (2 percent) had "struck-by"⁹ hazards or protruding objects that could cause injury.

Figure 2. Inoperable Fire Extinguisher and Broken Mounting Bracket



Source: OIG Photographs taken November 8, 2016, Larimer Post Office, Larimer, PA.

Figure 3. Exit Braced With Wood and Locked With Skeleton Key



Source: OIG photograph taken December 1, 2016, War Post Office, War, WV.

Figure 4. Exit Blocked With Mattress



Source: OIG photograph taken November 8, 2016, Littleton Post Office, Littleton, WV.

⁶ Handbook PO-209, *Retail Operations Handbook*, Section 6.11.3.6.1, dated October 2012.

⁷ Occupational Safety and Health Standards, Section 1910.157 – Portable Fire Extinguishers.

⁸ Potential asbestos exposure refers to asbestos-labeled floor tiles or walls that are cracked or damaged.

⁹ "Struck-by" injuries can be caused by being caught in or struck by moving machinery or other objects.

***We found 120 potentially
finable OSHA violations at
32 of the 51 facilities we visited.***

Figure 5. Trip Hazard



Source: OIG photographs taken November 8, 2016, Littleton Post Office, Littleton, WV.

**Figure 6. Poorly
Maintained Restroom**



Source: OIG photograph taken November 8, 2016, Mather Post Office, Mather, PA.

Figure 7. Peeling Floors



Source: OIG photograph taken November 8, 2016, Mather Post Office, Mather, PA.

We found 120 potentially finable OSHA violations¹⁰ at 32 of the 51 facilities we visited. These violations included:

- Potential asbestos and mold;
- Trip hazards;
- Blocked electrical boxes or exposed or hanging wires;
- Sanitary issues relating to cleanliness and lack of hot water;
- Blocked emergency exits or exits that were not properly marked;
- Fire extinguishers not serviced monthly or annually, or that were inoperable;
- 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 healthful workplace free of recognized hazards. Postal facilities with OSHA violations jeopardize the health, safety, and well-being of postal employees and customers.

Based on the 60 potentially finable OSHA violations we found at 23 statistically selected facilities,¹¹ we projected there are 15,326 potentially finable violations across the 5,875 retail facilities in the Eastern Area. We recognize, based on historical trends, that it is unlikely OSHA will inspect all facilities in the area. However, if the violations found at the sampled facilities were found

¹⁰ This footnote is for all bulleted items. Occupational Safety and Health Standards, General Industry – Means of Egress – Section 1910.37(b)(2); Sanitation – Section 1910.141; Trip Hazards – Section 1910.22; Asbestos – Sections 1910.1001; Mold – Pub 3304-04N 2006; Electrical and Lighting – Section 1910.303; Fire Extinguishers – Section 1910.157; OSHA posters – Section 1903.2(a)(1).

¹¹ We did not include the potentially finable OSHA violations we found at our 28 judgmentally selected sites.

Nineteen facilities (37 percent) needed repair and maintenance of ceilings, walls, and floors.

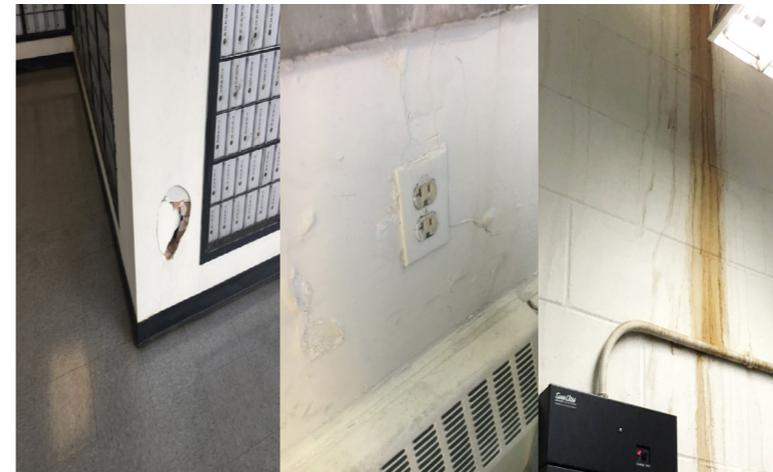
at other retail facilities in the Eastern Area, the potential expected monetary value of these violations for the entire area, at the average fine of \$2,100¹² per incident, would be about \$32.2 million. This represents the risk exposure and worst case scenario based on the issues identified.

Building Maintenance

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

- Nineteen facilities (37 percent) needed repair and maintenance of ceilings, walls, and floors. Some facilities had stained or damaged ceiling tiles; while others needed fresh paint, new carpets, and repairs to chipped and worn asbestos-containing floor tiles. We also observed dirty floors and walls needing repair (see Figures 8 and 9).
- Eight facilities (16 percent) had parking lot issues such as potholes and faded or missing painted parking spaces, including one parking lot that had broken cement-parking blocks with protruding metal that could cause physical harm or damage to a vehicle (see Figure 10).
- Six facilities (12 percent) had interior and exterior lighting issues, such as bulbs needing replacement and missing light covers.
- Five facilities (10 percent) had unappealing lobbies such as overflowing trash containers, empty or dirty merchandise racks, worn or damaged signage, and Priority Mail® tape used to secure shipping instructions to a counter in the lobby and repair a broken door handle (see Figures 11 and 12).

Figure 8. Damaged Walls



Source: OIG Photographs taken November 8, 2016, Nashville Northeast Station, Nashville, TN (left) and November 8, 2016, North Dayton Station, Dayton, OH (middle and right).

Figure 9: Damaged Asbestos Floors



Source: OIG photograph taken November 7, 2016, Orient Post Office, Orient, OH.

Figure 10. Broken Cement Parking Block With Protruding Metal



Source: OIG photograph taken December 1, 2016, Elizabethton Post Office, Elizabethton, TN.

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

¹³ Some facilities had multiple building maintenance issues.

Figure 11. Empty Merchandise Racks



Source: OIG Photographs taken November 8, 2016, North Dayton Station, Dayton, OH.

Figure 12. Damaged Signage



Source: OIG Photograph taken November 8, 2016, Larimer Post Office, Larimer, PA.

- Four facilities (8 percent) had landscaping issues such as rotting landscape edging and overhanging limbs.
- Five facilities (10 percent) had exterior maintenance issues, such as dirty building exteriors, cracked cement entryways and dock platforms, and hanging weather stripping.
- Twenty-one (91 percent) did not complete a housekeeping inspection as required¹⁴ (see Table 1).

Table 1. Housekeeping Inspections

District	Housekeeping Inspections Performed	
	No	Yes
Appalachian PFC	3	0
Central Pennsylvania PFC	3	0
Kentuckiana PFC	3	0
Northern Ohio PFC	2	0
Ohio Valley PFC	2	0
Philadelphia Metropolitan PFC	0	1
South Jersey PFC	1	0
Tennessee PFC	1	1
Western New York PFC	3	0
Western Pennsylvania PFC	3	0
Total	21	2

Source: PS Form 4851 , Housekeeping Inspection, requested during statistically selected facility visits in 2016.

¹⁴ Handbook MS-47, *Housekeeping Postal Facilities*, Chapter 5, June 1, 1983.

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

- Management did not provide sufficient training and oversight to ensure employees followed the door locking policy.¹⁵ As a result, there is an increased risk of crime, such as mail tampering, robbery, and theft.
- Safety inspections conducted by district safety personnel and local management¹⁶ were ineffective because they did not identify potential hazards and risks included in this report. For the 23 statistically selected facilities visited as part of this audit, the last inspection for each facility reported no deficiencies. While some of the hazards and risks may not have existed during these inspections, at least 28 of them were present, such as noncompliant emergency exits and fire extinguishers, trip hazards, and poor sanitary conditions (see Table 2).

Table 2. Hazards That Existed During Last Safety Inspection

Facility	Last Safety Inspection Date ¹⁷	Existing Hazards
Littleton, WV	1/25/2016	<ul style="list-style-type: none"> • Mattress blocking emergency exit • Trip hazard
Eglon, WV	1/9/2016	<ul style="list-style-type: none"> • Exit not labeled
War, WV	1/12/2016	<ul style="list-style-type: none"> • Rear door secured with a wood brace and required a skeleton key to unlock it; door was old and difficult to open
Oneida, PA	1/8/2016	<ul style="list-style-type: none"> • Exit not labeled
Ralston, PA	11/18/2015	<ul style="list-style-type: none"> • Fire extinguishers not inspected annually since January 2014
Weeksbury, KY	12/1/2015	<ul style="list-style-type: none"> • Protruding stove pipe sharp/struck-by
Leipsic, OH	2/11/2016	<ul style="list-style-type: none"> • Cracks in asbestos flooring
Uniopolis, OH	2/18/2016	<ul style="list-style-type: none"> • Cracks in cement block is a trip hazard • Fire extinguisher not inspected annually or monthly since 1999
Orient, OH	11/3/2015	<ul style="list-style-type: none"> • Chipped and broken asbestos tiles in lobby
Elizabethton, TN	2/24/2016	<ul style="list-style-type: none"> • Employee parking lot has two broken cement parking blocks that are a potential trip hazard and have protruding rebars that could cause physical harm or damage to a vehicle
Java Village, NY	2/5/2016	<ul style="list-style-type: none"> • Fire extinguishers not inspected annually (last inspection was in 2013)
Dayton, NY	2/19/2016	<ul style="list-style-type: none"> • Fire extinguishers not inspected annually (last inspection was in 2013)

¹⁵ 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.

¹⁶ *Employee Labor Relations Manual*, Section 824.33, requires collateral duty facility safety coordinators and at least one supervisor to conduct annual inspections of each installation with less than 100 work years of employment in the regular workforce and district and plant safety personnel to conduct a semiannual inspection of all installations with 100 or more work years of employment in the regular workforce.

¹⁷ Last safety inspection date as of December 2016.

Local management did not always perform housekeeping inspections.

Facility	Last Safety Inspection Date ¹⁷	Existing Hazards
Mather, PA	1/8/2016	<ul style="list-style-type: none"> • Locked rear exit • Exit not labeled • Safety and sanitary issues — restroom in poor condition, stained sink, lack of hot water, missing ceiling tiles, damaged floor posing a sanitary issue and trip hazard • Hazardous materials — asbestos label on wall near the restroom and employees are unaware of where the asbestos is or how to protect themselves from exposure; missing ceiling tiles that expose peeling paint and cracked and crumbling plaster and drywall which could all be potentially hazardous; severely damaged floor that potentially exposes asbestos • Lighting — 50 percent or more of the lights are out and many are missing covers
Osceola Mills, PA	1/11/2016	<ul style="list-style-type: none"> • Asbestos label at the facility but employees are not aware of where it is or how to protect themselves from exposure
Larimer, PA	2/18/2016	<ul style="list-style-type: none"> • Trip hazard in utility room • Missing light covers

Source: OIG observations at statistically selected facilities.

- Current Postal Service policy gives postmasters the authority to procure services related to maintenance and testing of fire extinguishers.¹⁸ Managers stated that their local fire departments previously inspected fire extinguishers as a courtesy and they did not realize the service had stopped. District offices did not provide sufficient oversight to ensure fire extinguishers are properly maintained.
- Management did not always report maintenance, safety, and security deficiencies in eFMS or document issues on a 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.
- Local management did not always perform housekeeping inspections. Facilities under 25,000 square feet are required to perform quarterly self-assessments and maintenance managers are required to follow up yearly. Maintenance management did not provide sufficient oversight to ensure that inspections were completed as required.

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. It is the responsibility of the postmaster or postal facility manager to ensure that custodial maintenance is satisfactory.¹⁹ Postmasters or postal facility managers can request repair work from local maintenance personnel by completing a PS Form 4805, Maintenance Work Order Request. Postal Service policy requires repair work not completed via a PS Form 4805 to be entered into eFMS for tracking through the project manager, regardless of the dollar amount or the responsibility.²⁰

¹⁸ Handbook MS-56, *Fire Prevention and Control*, Section 483, Services for hydrostatic testing, recharging, or other specialized maintenance on portable extinguishers is procured by the postmaster under local purchase authority in all owned or leased buildings, March 15, 2006.

¹⁹ Handbook MS-47, *Housekeeping Postal Facilities*, Section 111, June 1, 1983.

²⁰ *Standard Operating Procedures for HUB Repairs and Alterations*, Section 1.3, January 2014.

Attention to these deficiencies could 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 affects revenue.

Customer Complaints

The Postal Service needs to improve procedures for monitoring local customer complaints. We found 35 of 51 facilities (69 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved. These deficiencies occurred because district management did not provide sufficient oversight to ensure customer complaint logs were maintained.

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 facility condition review reports,²² the OIG noted manual customer complaint logs are not maintained at all retail facilities. We recommended Postal Service management reinforce the requirement to maintain customer complaint logs so customer complaints are recorded, tracked, and resolved timely. In June 2016, the chief operating officer and executive vice president sent letters 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 customer concerns. Management was directed to adhere to the policy regarding customer complaint logs. To reinforce the policy, Eastern Area management communicated the June memorandum contents to district management, who confirmed they disseminated the policy to every facility. However, log maintenance issues still exist.

Workplace Environment and Workplace Violence Policies

The Postal Service must improve the process for displaying required information relating to workplace environment, violence, and emergency preparedness policies. Forty-four facilities (86 percent) did not display workplace environment posters and 24 (47 percent) did not display workplace violence posters.²³ Specifically, we observed the following:

- Forty-one facilities (80 percent) did not display at least one of the required OSHA posters — Poster 3165 or Poster 3167, *Job Safety and Health Protection* (in English or Spanish, respectively).²⁴
- Twenty-nine facilities (57 percent) did not display Poster CA-10, *What a Federal Employee Should Do When Injured at Work*.²⁵
- Nineteen facilities (37 percent) did not display the *Zero Tolerance Policy and Reporting Procedures* poster.²⁶

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 Area* (Report Number [SM-AR-16-009](#), dated July 18, 2016); *Facility Condition Reviews – Great Lakes Area* (Report Number [SM-AR-16-010](#), dated September 2, 2016); *Facility Condition Reviews – Northeast Area* (Report Number [SM-AR-17-001](#), dated November 9, 2016); *Facility Condition Reviews – Southern Area* (Report Number [SM-AR-17-003](#), dated April 28, 2017).

23 Some facilities were missing multiple posters.

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

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

26 *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 relating to a work environment that is free of harassment and other inappropriate conduct such as discrimination.

We found 35 of 51 facilities (69 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved.

- Seventeen facilities (33 percent) did not have emergency contact numbers next to each phone.
- Eleven facilities (22 percent) did not display the Fire Prevention Plan (FPP)²⁷ as required at postal facilities with more than 10 employees.
- Six facilities (12 percent) did not display Poster 7, *Rules and Regulations Governing Conduct on Postal Property*.²⁸
- Three facilities (6 percent) did not display an Emergency Action Plan (EAP) plan at postal facilities with more than 10 employees.
- Five facilities (10 percent) did not display the OIG poster,²⁹ though it is not required.

The POM and *Supervisor's Safety Handbook* 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 injury and of their rights and responsibilities regarding the zero tolerance policy.

In most instances, OIG auditors provided copies of the required posters to 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

Three facilities needed hand rail repairs, repaving, or repainting of the handicap parking area. In addition, two facilities 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 obtained waivers from this requirement for these two facilities because the buildings were constructed prior to the ABA and it was not feasible to alter them. Although the ABA allows this exemption, providing a ramp to the buildings would offer greater accessibility. The Postal Service should continue its efforts to promote accessibility to employees and customers with disabilities.

²⁷ EL-801 section 8-18 (d).

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 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, workplace environment, workplace violence policy, and handicap accessibility issues identified during our audit.

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

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

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

2. Direct district managers to establish an oversight mechanism to ensure local management at retail facilities comply with Management Instruction PO-160-2014-1, Complaint Resolution and Proper Use of Notice 4314-C, so customer complaints are recorded, tracked, and resolved timely.

We recommend the vice president, Eastern Area:

3. Reiterate policy instructing retail facilities personnel to enter all applicable safety, security, and maintenance issues into the 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.
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 that 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.
6. Reinforce safety inspection policies and procedures, provide training to district safety personnel and local management, and establish an oversight mechanism to ensure safety inspections are completed accurately and deficiencies are addressed.

Management's Comments

Management agreed with our findings and recommendations but disagreed with the methodology used to determine the other impact amount of \$32,185,000 related to physical safety and security concerns.

Regarding recommendation 1, management has developed an action plan to address issues identified during our review. Management also stated that the Safety Toolkit monitors and tracks inspections entered into the system to ensure each facility is inspected. The target implementation date is December 31, 2017.

Regarding recommendation 2, management will reissue policy and enforce local compliance to ensure all complaints are recorded, tracked, and resolved timely. The district marketing manager or designee will also conduct periodic reviews. The target implementation date is May 31, 2017.

Regarding recommendation 3, management stated that they have a plan in place that is implemented and tracked each year. The Safety Toolkit monitors and tracks all inspections entered in the system to ensure each facility is inspected. Management also stated that Safety does not have control over facilities entering items, but will follow up if a deficiency is entered and not abated timely. The target implementation date is June 30, 2017.

Regarding recommendation 4, management will issue a memorandum to maintenance managers reiterating the requirements for and importance of performing housekeeping inspections. The target implementation date is May 31, 2017.

Regarding recommendation 5, management will issue a memorandum to all facilities reiterating policies and procedures relating to maintenance and housekeeping standards, maintenance and inspection of fire extinguishers, security standards for facilities and vehicles, and the display of required posters. In addition, management will perform site inspections at a sampling of offices to ensure districts are performing oversight. The target implementation date is September 30, 2017.

Regarding recommendation 6, management will reissue the policy for inspections to the districts. In addition, all offices will be provided a diagram of required postings and certify that they have posted all required material. Finally, management will provide a newsbreak safety talk regarding the requirement for fire extinguisher inspections and their proper locations in a facility. The target implementation date is June 30, 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. Management also stated that while there were no findings at 10 percent of the sites we reviewed, we projected the findings across all 5,875 Eastern Area retail facilities without considering the 10 percent with no findings. Management further stated that the \$32.2 million does not appear realistic because in FY 2016, the Postal Service was assessed \$778,650 for 129 citations at 403 facilities, and the Eastern Area was assessed \$103,189 for 20 citations at 25 facilities.

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

Evaluation of Management's Comments

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

Regarding recommendation 3, although management agreed with the recommendation and provided a target implementation date, management did not explicitly state that they will reiterate the requirement for retail facilities personnel to enter safety, security, and maintenance issues into eFMS or complete a manual PS Form 4805. To close this recommendation, management will need to provide confirmation that this action has occurred.

Regarding the other impact, while the missing OSHA posters may not have resulted in actual fines in the past, we noted that the violations are "potentially" finable based on OSHA criteria. The OIG calculated the \$32.2 million in other impact using a valid

statistical sample of retail facilities in the Eastern 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 Eastern Area but noted that it is unlikely that OSHA will inspect all facilities. The other impact represents risk exposure 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

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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 23,000 — are leased and some have been occupied for more than 100 years. The Eastern Area has 5,875 retail facilities — 4,423 of them are leased and 1,424 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 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.

This is the fifth 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 Eastern Area.

To accomplish our objective we:

- Statistically sampled 23 facilities in ten districts in the Eastern Area.
- Conducted unannounced site visits at 51 facilities from October through December 2016 (see [Table 3](#)).
- 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 electronic Facility Management System (eFMS)³⁰; facility inspections; and safety inspections.
- Analyzed OSHA violations to project the potential impact to the Postal Service based on prior fines.

³⁰ The official record for real property inventory and the management system for administering all property related projects including acquisition, design, construction, disposal, repairs, health and safety mitigation, and property inspections. In addition, the program manages all aspects of the Postal Service property-leasing program.

Table 3. Facilities Visited in Eastern Area

District	Leased/ Owned	Unit Name	City, State
Appalachian	Leased	Eglon Post Office	Eglon, WV
Appalachian	Leased	Littleton Post Office	Littleton, WV
Appalachian	Leased	War Post Office	War, WV
Appalachian	Owned	Roanoke Processing & Distribution Center (P&DC)*	Roanoke, VA
Central Pennsylvania	Leased	Oneida Post Office	Oneida, PA
Central Pennsylvania	Leased	Ralston Post Office	Ralston, PA
Central Pennsylvania	Leased	Rock Glen Post Office	Rock Glen, PA
Kentuckiana	Leased	Cecilia Post Office	Cecilia, KY
Kentuckiana	Leased	London Main Post Office*	London, KY
Kentuckiana	Leased	Louisville MLK Station*	Louisville, KY
Kentuckiana	Leased	Weeksbury Post Office	Weeksbury, KY
Kentuckiana	Owned	Brooks Main Post Office*	Brooks, KY
Kentuckiana	Owned	Louisville Downtown Station*	Louisville, KY
Kentuckiana	Owned	Louisville P&DC*	Louisville, KY
Kentuckiana	Owned	Shelbyville Main Post Office*	Shelbyville, KY
Kentuckiana	Owned	Somerset Main Post Office*	Somerset, KY
Kentuckiana	Owned	Williamsburg Post Office	Williamsburg, KY
Northern Ohio	Leased	Leipsic Post Office	Leipsic, OH
Northern Ohio	Leased	Uniopolis Post Office	Uniopolis, OH
Northern Ohio	Owned	Cleveland - Bedford Branch*	Bedford, OH
Northern Ohio	Owned	Cleveland - South Euclid*	Cleveland, OH
Northern Ohio	Owned	John O. Holly Building (co-located with Cleveland Processing & Distribution Center)*	Cleveland, OH
Ohio Valley	Leased	North Dayton Station	Dayton, OH
Ohio Valley	Leased	Orient Post Office	Orient, OH
Ohio Valley	Owned	Dayton-Washington Post Office*	Dayton, OH
Philadelphia Metropolitan	Leased	Chadds Ford Post Office	Chadds Ford, PA
South Jersey	Leased	Dover Main Post Office*	Dover, DE
South Jersey	Leased	Little Creek Post Office	Little Creek, DE
South Jersey	Leased	Trenton Carrier Annex*	Trenton, NJ

District	Leased/ Owned	Unit Name	City, State
South Jersey	Owned	Brick Post Office*	Brick, NJ
South Jersey	Owned	Elmer Post Office*	Elmer, NJ
South Jersey	Owned	Englishtown Post Office*	Englishtown, NJ
South Jersey	Owned	Pennsville Main Post Office*	Pennsville, NJ
Tennessee	Leased	Lascassas Post Office	Lascassas, TN
Tennessee	Leased	Nashville Northeast Station*	Nashville, TN
Tennessee	Owned	Anitoch Main Post Office*	Anitoch, TN
Tennessee	Owned	Collierville Main Post Office*	Collierville, TN
Tennessee	Owned	Cordova Main Post Office*	Cordova, TN
Tennessee	Owned	Elizabethton Post Office	Elizabethton, TN
Tennessee	Owned	Germantown Main Post Office*	Germantown, TN
Tennessee	Owned	Madison Main Post Office*	Madison, TN
Tennessee	Owned	Old Hickory Post Office*	Old Hickory, TN
Tennessee	Owned	Smyrna Main Office*	Smyrna, TN
Western New York	Leased	Java Village Post Office	Java Village, NY
Western New York	Owned	Dayton Post Office	Dayton, NY
Western Pennsylvania	Leased	Larimer Post Office	Larimer, PA
Western Pennsylvania	Leased	Mather Post Office	Mather, PA
Western Pennsylvania	Leased	Mendon Post Office	Mendon, NY
Western Pennsylvania	Leased	Osceola Mills Post Office	Osceola Mills, PA
Western Pennsylvania	Owned	Greentree Station*	Pittsburgh, PA
Western Pennsylvania	Owned	Sewickly Post Office*	Sewickly, PA

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

We conducted this performance audit from October 2016 through May 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 April 14, 2017, and included their comments where appropriate.

We obtained facility information from the eFMS and compared a statistical sample of retail facilities to outside databases 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 – Southern Area</i>	Determine if Postal Service management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities.	SM-AR-17-003	4/28/2017	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.	SM-AR-17-001	11/9/2016	\$10.6
<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.	SM-AR-16-010	9/2/2016	None
<i>Facility Condition Reviews – Capital Metro Area</i>	Determine if Postal Service management adhered to building maintenance and safety and security standards, and employee working condition requirements at retail facilities.	SM-AR-16-009	7/18/2016	None
<i>Working Conditions at the [REDACTED]</i>	Investigate reported poor working conditions at the [REDACTED] in New Mexico.	HR-MA-15-004	9/2/2015	None
<i>Deputy Postmaster General Use of Data</i>	Determine whether the deputy postmaster general effectively uses internal and external business data to manage business activities and mitigate risk.	SM-AR-15-002	3/19/2015	None

Appendix B: Observation Summary

Table 4. Summary of Statistically Sampled Facilities

District	Appalachian			Central PA			Kentuckiana			Northern Ohio		Ohio Valley		Phil. Metro	South Jersey	Tennessee		Western New York		Western Pennsylvania								
	Eglon Post Office	Littleton Post Office	War Post Office	Oneida Post Office	Ralston Post Office	Rock Glen Post Office	Cecilia Post Office	Weeksbury Post Office	Williamsburg Post Office	Leipsic Post Office	Uniopolis Post Office	North Dayton Station	Orient Post Office	Chadds Ford Post Office	Little Creek Post Office	Elizabethton Post Office	Lascassas Post Office	Dayton Post Office	Java Village Post Office	Larimer Post Office	Mather Post Office	Mendon Post Office	Osceola Mills Post Office	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %	
Building Appearance																												
Is the building clean and well maintained?	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	D	D	✓	✓	✓	✓	✓	✓	✓	✓	D	D	✓	✓	18	5	0	22%
Are paint, plaster, wall, floor, and ceiling coverings in good condition?	D	D	✓	D	D	✓	✓	✓	✓	✓	D	D	D	D	D	D	D	✓	✓	D	D	✓	✓	10	13	0	57%	
Is the lobby inviting?	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	D	D	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	19	4	0	17%
Is landscaping well maintained and is all excessive equipment removed from the facility?	✓	X ¹	✓	D	✓	✓	✓	X ¹	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	X ¹	X ¹	X ¹	X ¹	X ¹	14	2	7	9%
Is there sufficient lighting inside/outside the facility?	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	D	D	✓	✓	19	4	0	17%		
Are docks, platforms, and parking areas properly marked?	X ¹	✓	X ¹	D	D	D	✓	X ¹	✓	✓	X ¹	✓	✓	D	✓	D	✓	✓	X ¹	✓	D	✓	✓	12	6	5	26%	
Building Safety and Security																												
Are non-retail doors of the facility secured and are all vehicles locked and empty of mail?	✓	✓	✓	✓	✓	X ¹	✓	✓	✓	✓	X ¹	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	21	0	2	0%
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	2	21	0	91%

✓ - No Deficiency , D- Deficiency , X¹- Not Applicable , X²- Not Observed

District	Appalachian			Central PA			Kentuckiana			Northern Ohio		Ohio Valley		Phil. Metro	South Jersey	Tennessee		Western New York		Western Pennsylvania							
	Eglon Post Office	Littleton Post Office	War Post Office	Oneida Post Office	Ralston Post Office	Rock Glen Post Office	Cecilia Post Office	Weeksbury Post Office	Williamsburg Post Office	Leipsic Post Office	Uniopolis Post Office	North Dayton Station	Orient Post Office	Chadds Ford Post Office	Little Creek Post Office	Elizabethton Post Office	Lascassas Post Office	Dayton Post Office	Java Village Post Office	Larimer Post Office	Mather Post Office	Mendon Post Office	Osceola Mills Post Office	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
Are all other safety concerns in working order?	✓	✓	D	✓	D	D	✓	D	D	✓	✓	✓	✓	D	✓	D	✓	✓	D	D	✓	✓	14	9	0	39%	
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	5	18	0	78%
Are all initial contacts and final responses with the customer made within required timeframes, after receiving the comment or complaint?	D	D	D	D	D	X ¹	D	D	D	D	D	D	D	D	X ¹	D	D	✓	✓	D	D	✓	D	3	18	2	78%
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	5	18	0	78%
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	D	D	D	1	22	0	96%
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	X ¹	X ¹	✓	✓	10	0	13	0%

✓- No Deficiency , D- Deficiency , X¹- Not Applicable , X²- Not Observed

District	Appalachian			Central PA			Kentuckiana			Northern Ohio		Ohio Valley		Phil. Metro	South Jersey	Tennessee		Western New York		Western Pennsylvania							
	Eglon Post Office	Littleton Post Office	War Post Office	Oneida Post Office	Ralston Post Office	Rock Glen Post Office	Cecilia Post Office	Weeksbury Post Office	Williamsburg Post Office	Leipsic Post Office	Uniopolis Post Office	North Dayton Station	Orient Post Office	Chadds Ford Post Office	Little Creek Post Office	Elizabethton Post Office	Lascassas Post Office	Dayton Post Office	Java Village Post Office	Larimer Post Office	Mather Post Office	Mendon Post Office	Osceola Mills Post Office	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
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	X ¹	X ¹	X ¹	✓	✓	✓	X ¹	✓	X ¹	D	X ¹	✓	X ¹	X ¹	X ¹	X ¹	X ¹	✓	✓	8	1	14	4%
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	✓	✓	✓	✓	✓	✓	✓	18	5	0	22%
Although not required, does the facility have an OIG poster displayed?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	✓	✓	✓	✓	✓	✓	21	2	0	9%
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	✓	12	11	0	48%
Does the facility have a 7 Rules and Regulations Governing Conduct on Postal Property poster displayed?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	22	1	0	4%

✓- No Deficiency , D- Deficiency , X¹- Not Applicable , X²- Not Observed

District	Appalachian			Central PA			Kentuckiana			Northern Ohio		Ohio Valley		Phil. Metro	South Jersey	Tennessee		Western New York		Western Pennsylvania							
	Eglon Post Office	Littleton Post Office	War Post Office	Oneida Post Office	Ralston Post Office	Rock Glen Post Office	Cecilia Post Office	Weeksbury Post Office	Williamsburg Post Office	Leipsic Post Office	Uniopolis Post Office	North Dayton Station	Orient Post Office	Chadds Ford Post Office	Little Creek Post Office	Elizabethton Post Office	Lascassas Post Office	Dayton Post Office	Java Village Post Office	Larimer Post Office	Mather Post Office	Mendon Post Office	Osceola Mills Post Office	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
Other																											
Is the facility handicap accessible?	✓	✓	✓	D	D	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	D	✓	✓	18	5	0	22%
Totals																											
No Issue	9	11	12	6	7	13	13	9	14	14	10	12	9	11	14	11	9	14	12	8	4	16	14				
Deficiency	8	6	7	12	11	3	5	9	6	6	7	8	9	9	3	9	9	4	4	9	13	3	5				
Not Applicable or Not Observed	3	3	1	2	2	4	2	2	0	0	3	0	2	0	3	0	2	2	4	3	3	1	1				

✓ - No Deficiency , D- Deficiency , X¹- Not Applicable , X²- Not Observed

Table 5. Summary of Judgmentally Selected Facilities

District	Appalachian		Kentuckiana						Northern Ohio			Ohio Valley	South Jersey						Tennessee						Western PA		No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %		
	Roanoke P&DC	Brooks Main Post Office	London Main Post Office	Louisville MLK Station	Louisville Downtown Station	Louisville P&DC	Shelbyville Main Post Office	Somerset Main Post Office	Cleveland - Bedford Branch	Cleveland - South Euclid	John O. Holly Building (co-located with Cleveland P&DC)	Dayton-Washington Post Office	Brick Post Office	Dover Main Post Office	Elmer Post Office	Englishtown Post Office	Pennsville Main Post Office	Trenton Carrier Annex	Anitoch Main Post Office	Collierville Main Post Office	Cordova Main Post Office	Germantown Main Post Office	Madison Main Post Office	Nashville Northeast Station	Old Hickory Post Office	Smyrna Main Office					Greentree Station	Sewickly Post Office
Building Appearance																																
Is the building clean and well maintained?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	28	0	0	0%
Are paint, plaster, wall, floor, and ceiling coverings in good condition?	✓	✓	✓	D	D	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	24	4	0	14%	
Is the lobby inviting?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	27	1	0	4%	
Is landscaping well maintained and is all excessive equipment removed from the facility?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	D	✓	D	✓	✓	✓	✓	✓	✓	25	3	0	11%	
Is there sufficient lighting inside/outside the facility?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	D	✓	✓	✓	✓	26	2	0	7%	
Are docks, platforms, and parking areas properly marked?	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	26	2	0	7%	
Building Safety and Security																																
Are non-retail doors of the facility secured and are all vehicles locked and empty of mail?	X ²	X ²	✓	✓	D	X ²	X ²	✓	✓	✓	✓	✓	X ²	✓	X ²	X ²	X ²	✓	✓	✓	✓	✓	D	✓	✓	D	✓	17	3	8	11%	
Is the building free of obvious OSHA safety hazards?	✓	✓	X ²	D	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	✓	✓	D	✓	D	✓	D	✓	✓	D	D	18	9	1	32%	

✓- No Deficiency , D- Deficiency , X¹- Not Applicable , X²- Not Observed

District	Appalachian	Kentuckiana							Northern Ohio			Ohio Valley	South Jersey						Tennessee						Western PA		No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %				
	Roanoke P&DC	Brooks Main Post Office	London Main Post Office	Louisville MLK Station	Louisville Downtown Station	Louisville P&DC	Shelbyville Main Post Office	Somerset Main Post Office	Cleveland - Bedford Branch	Cleveland - South Euclid	John O. Holly Building (co-located with Cleveland P&DC)	Dayton-Washington Post Office	Brick Post Office	Dover Main Post Office	Elmer Post Office	Englishtown Post Office	Pennsville Main Post Office	Trenton Carrier Annex	Anitoch Main Post Office	Collierville Main Post Office	Cordova Main Post Office	Germantown Main Post Office	Madison Main Post Office	Nashville Northeast Station	Old Hickory Post Office	Smyrna Main Office					Greentree Station	Sewickly Post Office		
Are all other safety concerns in working order?	X ²	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	D	✓	✓	✓	D	✓	✓	D	✓	22	5	1	18%		
Customer Complaints																																		
Are one or more customer complaint control logs maintained at the facility?	X ²	✓	✓	D	✓	✓	✓	✓	D	D	D	✓	✓	X ²	D	✓	D	✓	D	D	D	D	D	D	D	D	D	D	D	D	10	16	2	57%
Are all initial contacts and final responses with the customer made within required timeframes, after receiving the comment or complaint?	X ²	✓	✓	D	✓	✓	✓	✓	D	D	D	✓	X ²	X ²	D	D	D	✓	D	X ²	D	D	D	D	D	D	D	D	D	D	8	16	4	57%
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	D	✓	D	✓	✓	✓	D	✓	✓	✓	✓	16	11	1	39%		
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	D	D	9	19	0	68%

✓- No Deficiency , D- Deficiency , X¹- Not Applicable , X²- Not Observed

District	Appalachian	Kentuckiana							Northern Ohio			Ohio Valley	South Jersey						Tennessee						Western PA		No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %		
	Roanoke P&DC	Brooks Main Post Office	London Main Post Office	Louisville MLK Station	Louisville Downtown Station	Louisville P&DC	Shelbyville Main Post Office	Somerset Main Post Office	Cleveland - Bedford Branch	Cleveland - South Euclid	John O. Holly Building (co-located with Cleveland P&DC)	Dayton-Washington Post Office	Brick Post Office	Dover Main Post Office	Elmer Post Office	Englishtown Post Office	Pennsville Main Post Office	Trenton Carrier Annex	Anitoch Main Post Office	Collierville Main Post Office	Cordova Main Post Office	Germantown Main Post Office	Madison Main Post Office	Nashville Northeast Station	Old Hickory Post Office	Smyrna Main Office	Greentree Station	Sewickly Post Office				
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	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	D	✓	D	✓	✓	✓	✓	23	3	2	11%	
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	✓	D	✓	✓	X ¹	✓	D	D	X ²	✓	✓	D	✓	✓	✓	D	✓	✓	✓	D	D	✓	D	D	✓	D	15	10	3	36%
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	✓	X ²	✓	✓	✓	✓	✓	D	D	✓	D	D	✓	✓	✓	D	✓	D	D	✓	D	D	D	D	15	12	1	43%
Although not required, does the facility have an OIG poster displayed?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	✓	D	✓	✓	✓	✓	25	3	0	11%

✓- No Deficiency , D- Deficiency , X¹- Not Applicable , X²- Not Observed

District	Appalachian	Kentuckiana							Northern Ohio			Ohio Valley	South Jersey						Tennessee						Western PA		No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %			
	Roanoke P&DC	Brooks Main Post Office	London Main Post Office	Louisville MLK Station	Louisville Downtown Station	Louisville P&DC	Shelbyville Main Post Office	Somerset Main Post Office	Cleveland - Bedford Branch	Cleveland - South Euclid	John O. Holly Building (co-located with Cleveland P&DC)	Dayton-Washington Post Office	Brick Post Office	Dover Main Post Office	Elmer Post Office	Englishtown Post Office	Pennsville Main Post Office	Trenton Carrier Annex	Anitoch Main Post Office	Collierville Main Post Office	Cordova Main Post Office	Germantown Main Post Office	Madison Main Post Office	Nashville Northeast Station	Old Hickory Post Office	Smyrna Main Office	Greentree Station	Sewickly Post Office					
Workplace Violence																																	
Does the facility have the Zero Tolerance Policy and Reporting Procedures poster displayed?	✓	✓	✓	D	D	✓	✓	D	✓	D	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	✓	20	8	0	29%	
Does the facility have a 7 Rules and Regulations Governing Conduct on Postal Property poster displayed?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	✓	✓	✓	✓	✓	D	✓	D	✓	✓	✓	✓	✓	✓	23	5	0	18%	
Other																																	
Is the facility handicap accessible?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X ²	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	27	0	1	0%
Totals																																	
No Issue	15	17	19	11	13	18	17	19	15	13	16	16	13	14	15	14	14	16	17	10	16	10	15	8	14	14	11	14					
Deficiency	0	0	0	9	7	0	0	1	5	7	3	3	5	4	4	5	5	4	3	9	4	10	5	12	6	6	9	6					
Not Applicable or Not Observed	5	3	1	0	0	2	3	0	0	0	1	1	2	2	1	1	1	0	0	1	0	0	0	0	0	0	0	0					

✓- No Deficiency , D- Deficiency , X¹- Not Applicable , X²- Not Observed

Appendix C: Management's Comments



May 2, 2017

LORI LAU DILLARD, DIRECTOR, AUDIT OPERATIONS

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

The Eastern Area has reviewed the draft Facility Condition Reviews – Eastern Area Report and management agrees with the audit's findings and recommendations as they pertain to the importance of maintaining safe and clean working environments.

The Eastern Area is requesting the OIG give consideration to the following when determining the statistical validity of the monetary impacts. The Eastern Area believes the monetary impact should be reduced based upon the premise below.

- Missing OSHA posters were cited in 41 of 51 (80%) findings, but research could not find any instances, in the past five years, of OSHA fines assessed due to missing posters in the United States Postal Service.
- There were no findings in 5 of 51 (10%) sites reviewed; however, findings were applied across all 5,875 Eastern Area retail facilities without consideration given for the previously cited 10% without findings.
- The \$32.2 million does not appear to be realistic. In FY 2016 the Postal Service as a whole was assessed with approximately \$778,650 for 129 citations for 403 facilities. In FY16 the Eastern Area was assessed with \$103,189 for 20 citations for 25 facilities.

Recommendation 1:

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

Management Response/Action Plan:

Management agrees with this recommendation. The Eastern Area in conjunction with Facilities has developed an action plan to address concerns identified belonging to responsible parties identified.

HQ Safety, Area, and District offices have a plan in place and it is implemented and tracked each year. The STK (Safety Toolkit) monitors all inspections entered into the system. It tracks to ensure each facility is inspected by the appropriate assigned

personnel. District Safety Conducts inspections in facilities with >50 work years. Trained FSC (Facility Safety Coordinator) conduct their own inspection and enter into the STK. Eastern Area has been at 100% compliance with this program since the inception of the program. YTD FY2017 Eastern Area is 96.63% complete.

Target Implementation Date:

December 31, 2017

Responsible Official:

Terry Schram – Facilities Customer Relations Manager
Bruce Goetz – Area Safety Manager

Recommendation 2:

Direct district managers to establish an oversight mechanism to ensure local management at retail facilities comply with Management Instruction PO-160-2014-1, Complaint Resolution and Proper Use of Notice 4314-C, so customer complaints are recorded, tracked, and resolved timely.

Management Response/Action Plan:

Management agrees with the recommendation. The policy already has designed procedures to monitor effectiveness. The Eastern Area Marketing Manager will reissue Management Instruction PO-160-2014-1, Complaint Resolution and Proper Use of Notice 4314-C. We will enforce local compliance with the policy making sure that all customer complaints are recorded, tracked, and resolved timely. Periodic reviews will be conducted by the District Marketing Manager or designee.

Target Implementation Date:

May 31, 2017

Responsible Official:

Jesus Galvez – Area Marketing Manager
District Managers

Recommendation 3:

Reiterate policy instructing retail facilities personnel to enter all applicable safety, security, and maintenance issues into the 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.

Management Response/Action Plan:

Management agrees with this recommendation. HQ Safety, Area, and District offices have a plan in place and it is implemented and tracked each year. The STK (Safety Toolkit) monitors all inspections entered into the system. It tracks to ensure each facility is inspected by the appropriate assigned personnel. District Safety Conducts inspections in facilities with >50 work years. Trained FSC (Facility Safety Coordinator) conduct their own inspection and enter into the STK. Eastern Area has been at 100% compliance with this program since the inception of the program. YTD FY2017 Eastern Area is 96.63% complete. Safety does not have control over facilities entering items, but will have calls

placed to the response line for entry. Safety will follow up and check if a deficiency was entered if it is not abated timely.

Target Implementation Date:

June 30, 2017.

Responsible Official:

Bruce E. Goetz, Manager Safety, Eastern Area
District Safety Managers, Eastern Area

Recommendation 4:

Reiterate to maintenance managers the requirement of Handbook MS-47, *Housekeeping Postal Facilities*, to have all facilities perform housekeeping inspections.

Management Response/Action Plan:

Management agrees with the recommendation. The Area Manager Maintenance Operations will issue a memo to maintenance managers to reiterate the requirements of the MS-47 and the importance of performing housekeeping inspections.

Target Implementation Date:

May 31, 2017

Responsible Official:

Jack Cleary – Area Manager Maintenance Operations

Recommendation 5:

Establish an oversight mechanism to ensure that 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 Response/Action Plan:

Management agrees with the recommendation and will issue a memo to all facilities reiterating the criteria set forth in the recommendation, as well as, perform sites inspections at a sampling of offices to ensure oversight is being performed in the District.

Target Implementation Date:

September 30, 2017

Responsible Official:

Jack Cleary – Area Manager Maintenance Operations

Recommendation 6:

- Reinforce safety inspection policies and timely completion.
- Provide needed training in specific areas to district safety personnel and site managers.
- Establish a cadence oversight mechanism to ensure safety inspections in <50 work year offices are completed accurately and deficiencies are reported properly.

Management Response/Action Plan:

Management agrees with the recommendation. Of the findings in this report, the District Safety staff members are required to conduct inspections for 16 of the 51 (31%) of the facilities reviewed. These are any facilities that are greater than 50+ work year offices. In addition, 33 of the 51 (65%) facilities reviewed are conducted by the Facility Safety Coordinator (FSC). The FSCs in these sites are required to complete training course number 10017228 in LMS. These employees are responsible for conducting their own site inspections and entering any deficiencies into the Safety Toolkit (STK). Safety monitors the Hazard Abatement Plans (HAP) that may be generated from the deficiencies reported. Two of the 51 (4%) facilities noted on this report could not be located in the safety database (Mendon, Western PA District and John O. Holly, Northern OH District).

- A reminder of the policy for inspections in all work year offices conducted will be re-issued to the districts.
- All offices will be provided with a unified diagram of required postings and be required to certify that they have posted all required postal material.
- All offices will be provided a newsbreak Safety talk regarding fire extinguisher inspections and proper location within their facility. This will include information on how to acquire assistance from local fire extinguisher companies and/or certified fire extinguisher contractors.

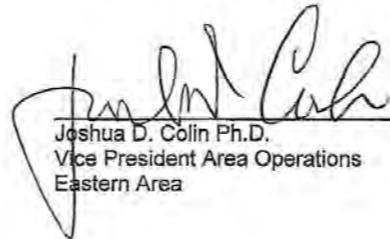
Target Implementation Date:

June 30, 2017.

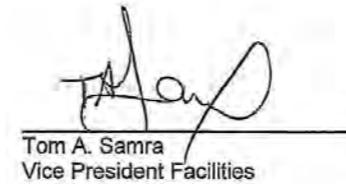
The bulletin board diagram was distributed during the Lean Safety and VIP program rollout in all level 20 office and above within the last 12 months.

Responsible Official:

Betty Davis-Smith, Manager Human Resources, Eastern Area
Bruce E. Goetz, Manager Safety, Eastern Area



Joshua D. Collin Ph.D.
Vice President Area Operations
Eastern Area



Tom A. Samra
Vice President Facilities



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UNITED STATES POSTAL SERVICE

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