



OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Facility Condition Reviews — Western Area

Audit Report

Report Number
SM-AR-17-009

September 8, 2017





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Highlights

***Eighteen facilities (46 percent)
had potential fineable
OSHA violations.***

Background

The U.S. Postal Service has more than 30,000 leased and owned retail facilities nationwide. Over 7,100 of these facilities are in the Western Area. The Post Office lobby is the principal business office of the Postal Service. The lobby's appearance directly affects the USPS's image because it is the only close-up view of postal operations for many customers. The USPS 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 USPS management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities. We reviewed 39 judgmentally selected facilities in the Western 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 seventh 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 39 facilities and found:

- Twenty-six facilities (67 percent) had building safety and security issues;
- Eighteen facilities (46 percent) had potential fineable OSHA violations;
- Twenty-five facilities (64 percent) had cleanliness and maintenance issues;
- Twenty-two facilities (56 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved;
- Twenty-five facilities (64 percent) did not display workplace environment posters such as those that inform employees what to do when injured at work; and
- Eight facilities (21 percent) did not display workplace violence posters, such as *Zero Tolerance Policy and Reporting Procedures*.
- All facilities provided handicap accessibility.

Issues related to building safety, security, and maintenance occurred because of competing priorities and local



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All facilities provided handicap accessibility.

management's failure to focus on cleaning, general maintenance and repairs, and housekeeping inspections. In addition, management did not provide sufficient oversight of employees or train them on communicating 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 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. It could also improve employee morale and reduce employee turnover. Poorly maintained and unappealing lobbies can also reduce brand loyalty, which affects revenue.

Local management took corrective action by immediately addressing certain deficiencies brought to their attention during our site visits, such as displaying missing posters and updating the repair status of maintenance reports in the electronic Facilities Management System.

What the OIG Recommended

We recommended management develop and implement an action plan to address all issues identified during our audit and direct retail facilities' personnel and district management to timely input all applicable issues into the electronic Facilities Management System and monitor the repair status of all reported issues, respectively. We also recommended management provide oversight to ensure compliance with policies and procedures relating to maintenance, security and safety standards, and customer complaint resolution. We further recommended management provide safety inspection training.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

September 8, 2017

MEMORANDUM FOR: GREGORY G. GRAVES
VICE PRESIDENT, WESTERN AREA

TOM A. SAMRA
VICE PRESIDENT, FACILITIES

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 – Western Area
(Report Number SM-AR-17-009)

This report presents the results of Facility Condition Reviews – Western Area (Project Number 17SMG020SM000).

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 USPS and is the only close-up view of postal operations for most customers; therefore, its appearance directly affects the USPS' public image.

Introduction

This report presents the results of our self-initiated audit of facility condition reviews in the Western Area (Project Number 17SMG020SM000). Our objective was to determine if U.S. Postal Service (USPS) 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 USPS and is the only close-up view of postal operations for most customers; therefore, its appearance directly affects the USPS' public image. The USPS 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 USPS 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, 7,187 of which are in the Western 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 at this post office, the OIG is conducting a national series of audits focusing on conditions related to building appearance, safety and security, customer complaints, workplace environment and violence, and handicap accessibility. For this audit — the seventh in the series — we visited 39 judgmentally selected facilities.²

Summary

The USPS 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

- Twenty-six facilities (67 percent) had building security and safety issues;
- Eighteen facilities (46 percent) had potential fineable OSHA violations;
- Twenty-five facilities (64 percent) had cleanliness and maintenance and issues;
- Twenty-two facilities (56 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved;
- Twenty-five facilities (64 percent) did not display workplace environment posters such as those that inform employees what to do when injured at work;
- Eight facilities (21 percent) did not display workplace violence posters, such as *Zero Tolerance Policy and Reporting Procedures*; and
- All facilities provided handicap accessibility.

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

² We judgmentally selected 15 facilities based on OIG Facilities Risk Model metrics related to maintenance and safety and 24 facilities based on 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 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. It could also improve employee morale and reduce employee turnover. Poorly maintained and unappealing lobbies can also reduce brand loyalty, which affects revenue.

Local management took corrective action by addressing certain deficiencies brought to their attention during our site visits, such as painting interior walls, repairing floor tiles, and displaying missing posters.

Building Security, Safety, and Maintenance

The USPS must improve the security, safety, and maintenance of its retail facilities in the Western Area. We assessed the exterior and interior conditions of 39 postal facilities and observed the following:⁵

Building Security

The USPS must improve security at its retail facilities. Specifically:

- Four facilities (10 percent) had 40 USPS vehicles that were unlocked and unattended.
- Two facilities (5 percent) did not prevent public access to employee work areas that should have been secured. The doors leading from the customer lobby to the employee work area of the facilities were unlocked and not monitored, allowing unrestricted access.
- One facility (3 percent) had an unsecured safe containing documents (see Figure 1).

Figure 1. Unlocked Safe in Workroom Area



Source: OIG photo taken June 6, 2017, Bonner Springs Post Office, Bonne Springs, KS.

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

⁴ Quarterly housekeeping inspections are required at facilities where the USPS provides custodial maintenance. Unit personnel are required to document satisfactory or unsatisfactory conditions at those facilities and submit them to district personnel.

⁵ Some facilities had multiple issues.

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

Building Safety

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

- Ten facilities (26 percent) had fire extinguishers that were not inspected either monthly or annually as required.⁷ One had fire extinguishers that had not been inspected since 2009, and another had inoperable fire extinguishers (see [Figures 2 and 3](#)).
- Five facilities (13 percent) had potential mold or asbestos exposure.⁸
- Seven facilities (18 percent) had lighting issues⁹ such as bulbs needing replacement or missing covers (see [Figure 4](#)).
- Four facilities (10 percent) had parking lot issues such as faded lines and missing directional arrows for the safe flow of traffic.
- Four facilities (10 percent) had potential tripping hazards, including two with uneven loading dock plates and another with a poorly maintained walkway for employee access (see [Figure 5](#)).
- Two facilities (5 percent) had electrical issues such as exposed wiring in the employee break room and an uncovered electrical outlet in the lobby area (see [Figure 6](#)).
- Two facilities (5 percent) had air conditioning issues. One facility had a recorded room temperature of 83 degrees Fahrenheit in June. Another facility with an inoperable air conditioner received numerous complaints from customers. The lobby was hot and uncomfortable and the facility had to replace three labeling equipment machines due to overheating (see [Figure 7](#)).
- One facility (3 percent) had potential lead paint exposure based on discussions with local management that was caused by chipped and peeling paint in the employee break room.
- One facility (3 percent) had a loose handrail on the stairs of the customer entrance.

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 were cracked or damaged.

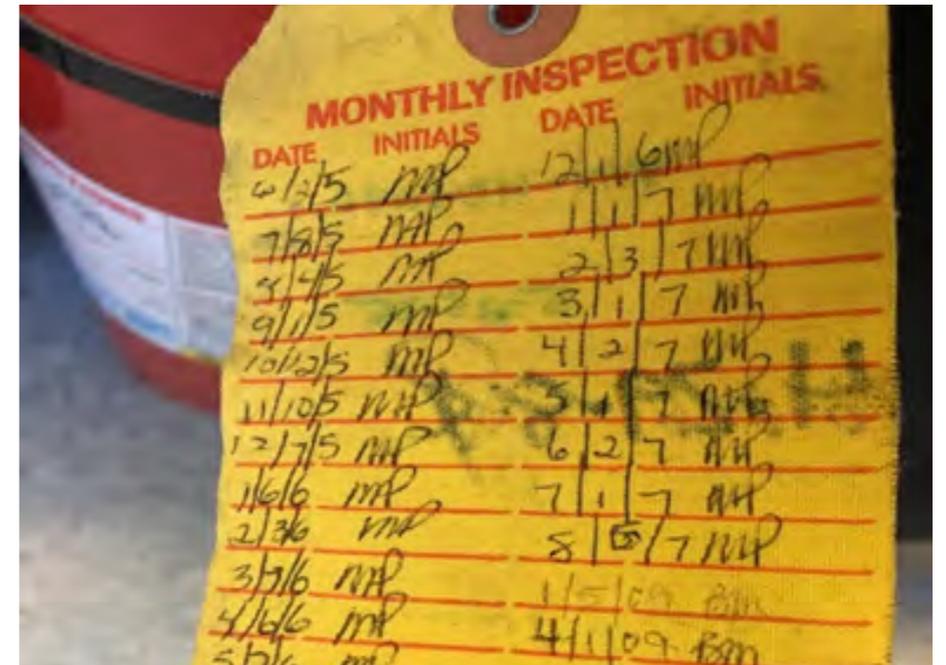
⁹ Lighting issues pertaining to safety include only facilities with more than 50 percent of lights not functioning.

Figure 2. Inoperable Fire Extinguishers



Source: OIG photo taken June 7, 2017, Globe Post Office, Globe, AZ.

Figure 3. Fire Extinguisher Not Inspected Since 2009



Source: OIG photo taken June 8, 2017, Drake Post Office, Drake, CO.

Figure 4. Bulbs Need Replacement and Cover is Missing



Source: OIG photo taken June 5, 2017, Waldron Post Office, Waldron, MO.

Figure 5. Tripping Hazard – Uneven Loading Dock Plate



Source: OIG photo taken June 8, 2017, Kansas City Post Office, Kansas City, KS.

We found 40 potentially fineable OSHA violations at 18 of the 39 facilities we visited.

Figure 6. Exposed Wiring



Source: OIG photo taken June 7, 2017, Globe Post Office, Globe, AZ.

Figure 7. Room Temperature of 83 Degrees Fahrenheit



Source: OIG photo taken June 6, 2017, Bonner Springs Post Office, Bonner Springs, KS.

We found 40 potentially fineable OSHA violations¹⁰ at 18 of the 39 facilities we visited. These violations included:

- Fire extinguishers that were not serviced monthly or annually, or were inoperable
- Inadequate lighting
- Trip hazards
- Potential asbestos and mold
- Exposed electrical outlet or wires
- Potential lead paint exposure
- Loose handrail on stairs
- Broken air conditioning
- Missing required OSHA posters

The USPS 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. USPS facilities with potentially fineable OSHA violations jeopardize the health, safety, and well-being of postal employees and customers.

Based on the 40 potentially finable OSHA violations we found at 18 of the 39 facilities, the potential monetary value at the average fine of \$2,100¹¹ per incident would be about \$84,000. This represents the risk exposure and worst-case scenario based on the issues identified.

¹⁰ This footnote is for all bulleted items. Occupational Safety and Health Standards, General Industry – Fire Extinguishers – Section 1910.157; Electrical and Lighting – Section 1910.303; Trip Hazards – Section 1910.22; OSHA posters – Section 1903.2(a)(1); Asbestos – Section 1910.1001; Mold – Pub 3304-04N 2006; Exposed Electrical Outlet – OSHA, Section 1926.416(a)(1); Lead Paint – OSHA, 1910-1025; Loose Handrail >200LBS – OSHA 3124-12R 2003; Thermostats – Pub. 650, Section 1.01, June 2016.

¹¹ Average fine amount the USPS paid for OSHA violations from 2012 to 2015 based on our findings.

Building Maintenance

The USPS must improve the maintenance of its retail facilities based on the following observations:¹²

- Sixteen facilities (41 percent) had ceilings, walls, and floors that needed repair and maintenance. Some facilities had stained or damaged ceiling tiles, while others needed fresh paint and repairs to missing and broken asbestos-containing floor tiles. We also observed dirty floors and walls needing repair (see Figures 8 and 9).

Sixteen facilities (41 percent) had ceilings, walls, and floors that needed repair and maintenance.

Figure 8. Damaged Walls



Source: OIG photos taken June 7, 2017, Globe, AZ.

Figure 9: Damaged Asbestos Floors



Source: OIG photo taken June 6, 2017, Wikieup Post Office, Wikieup, AZ.

- Eleven facilities (28 percent) had exterior maintenance issues, such as damaged loading dock bumpers, cracked decorative columns, cracked and broken windows, rotting wood on roof support beams, bubbling paint on windows, and missing letters in signage (see Figures 10 and 11).

Figure 10. Damaged Loading Dock Bumper



Source: OIG photo taken June 7, 2017, Robert L. Roberts Post Office, Kansas City, KS.

Figure 11. Missing Letter in Signage



Source: OIG photo taken June 8, 2017, Kansas City Post Office, Kansas City, KS.

¹² Some facilities had multiple building maintenance issues.

- Eleven facilities (28 percent) had interior and exterior lighting issues,¹³ such as bulbs needing replacement, missing light covers, and U.S. flags not illuminated after dusk.¹⁴
- Five facilities (13 percent) had unappealing lobbies with cobwebs and dead bugs on floors and ceilings (see Figure 12).

Figure 12. Dead Bugs in Ceiling Light Fixture



Source: OIG photo taken June 7, 2017. Tonto Basin Post Office, Tonto Basin, AZ.

- Three facilities (8 percent) had landscaping issues such as missing grass, weeds, overhanging limbs, and shrubbery that needed trimming.
- Four facilities did not complete a housekeeping inspection as required¹⁵ (see Table 1).

Table 1. Housekeeping Inspections Performed

District	No	Yes	N/A ¹⁶
Arizona	0	5	0
Colorado/Wyoming	0	4	1
Mid-America	4	1	0
Total	4	10	1

Source: PS Form 4851 requested during facility visits in FY 2017.

¹³ Lighting issues pertaining to maintenance include only facilities with less than 50 percent of lights not functioning.

¹⁴ U.S. flags are not required to be displayed after dusk; however, in these instances, the lights illuminating the flags were in disrepair.

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

¹⁶ Not applicable. Only facilities where the USPS provides custodial maintenance are required to conduct housekeeping inspections. Those with contract cleaning services are not required to perform housekeeping inspections.

- There were no deficiencies reported during prior safety inspections for 14 of the 15 facilities selected based on the OIG’s Facilities Risk Model.¹⁷ While some hazards and risks may not have existed during the prior inspections, at least 36 of them were present but not documented, such as uninspected fire extinguishers, inadequate lighting, and trip hazards (see Table 2).

Table 2. Hazards That Existed During Last Safety Inspection

Facility	Last Safety Inspection Date	Existing Hazards
Wikieup Post Office, Wikieup, AZ	3/8/2017	<ul style="list-style-type: none"> • Missing/broken asbestos tiles • Exposed subfloor in restroom • Poor lighting in customer lobby and possible electrical failure • No exterior lighting for customers • Cracked rebar and uneven parking lot • Employee railing needs reinforcement
Yucca Post Office, Yucca, AZ	3/8/2017	<ul style="list-style-type: none"> • Both fire extinguishers missing monthly inspection
Phoenix Washington Station, Phoenix, AZ	4/28/2017	<ul style="list-style-type: none"> • Uncovered electrical outlet in lobby • Employees unaware of physical location of asbestos
Tonto Basin Post Office, Tonto Basin, AZ	10/12/2016	<ul style="list-style-type: none"> • Missing emergency contact numbers next to each phone • Directional arrows needed in parking lot
Globe Post Office, Globe, AZ	12/21/2016	<ul style="list-style-type: none"> • Exposed wires above light fixture • Missing asbestos stickers on asbestos floor • Possible lead paint on walls • Two fire extinguishers missing monthly inspections • Four unused fire extinguishers stored in basement were not inspected monthly or annually • Path leading to employee parking lot contained wood planks and branches, causing a tripping hazard • Employee parking lot is unlit
Waldron Post Office, Waldron, MO	1/17/2017	<ul style="list-style-type: none"> • Fire extinguishers missing annual and monthly inspections
Bonner Springs Post Office, Bonner Springs, KS	10/24/2016	<ul style="list-style-type: none"> • Two fire extinguishers missing monthly inspections
Kansas City Post Office, Kansas City, KS	1/6/2017	<ul style="list-style-type: none"> • Faded lines in parking lot • Tripping hazard — metal loading dock plate uneven • One fire extinguisher missing annual inspection

¹⁷ We did not review safety inspections for 24 facilities selected based on work performed by other OIG teams.

Designated personnel were not properly trained to conduct safety inspections.

Facility	Last Safety Inspection Date	Existing Hazards
Robert L. Roberts Post Office, Kansas City, KS	1/2/2017	<ul style="list-style-type: none"> • One fire extinguisher missing annual inspection • Cracks in concrete handicap access ramp, employee entrance, and employee parking lot • Tripping hazard — uneven loading dock plate • Faded lines in parking lot • No handicap parking space identified
Fontana Post Office, Fontana, KS	12/15/2016	<ul style="list-style-type: none"> • One fire extinguisher missing annual and monthly inspections • One of two exterior lightbulbs were missing
Drake Post Office, Drake, CO	4/17/2017	<ul style="list-style-type: none"> • Potential mold • Rotting subflooring • One fire extinguisher missing annual and monthly inspections
Livermore Post Office, Livermore, CO	4/18/2017	<ul style="list-style-type: none"> • Three fire extinguishers missing annual and monthly inspections
Larkspur Post Office, Larkspur, CO	1/11/2017	<ul style="list-style-type: none"> • Potential black mold
Saratoga Post Office, Saratoga, WY	1/3/2017	<ul style="list-style-type: none"> • Three fire extinguishers missing annual inspection

Source: OIG observations at facilities selected based on the OIG's Facilities Risk Model.

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.¹⁸
- Designated personnel were not properly trained to conduct safety inspections. USPS policy requires district safety personnel and local management to conduct safety inspections.¹⁹
- Management did not provide sufficient oversight to ensure monthly inspections or annual maintenance of fire extinguishers were completed. Current USPS policy gives postmasters the authority to procure services related to maintenance and testing of fire extinguishers.²⁰
- Employees were not properly trained to recognize and report maintenance, safety, and security deficiencies, assumed the deficiencies were previously reported, or chose not to address them. Additionally, due to lack of management oversight, issues

¹⁸ Handbook PO-209, *Retail Operations Handbook*, Section 6-11.3.6.1, Securing Doors, dated October 2012, requires employees to firmly adhere to the policy of locking doors. Management is responsible for ensuring compliance to protect USPS employees, funds, and property.

¹⁹ *Employee Labor Relations Manual*, Section 824.33, requires collateral duty facility safety coordinators and at least one supervisor to inspect each installation with less than 100 work years of employment in the regular workforce annually and district and plant safety personnel to inspect all installations with 100 or more work years of employment in the regular workforce semiannually.

²⁰ 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.

We found 22 of 39 facilities (56 percent) did not maintain a customer complaint log or monitor how promptly complaints are resolved.

reported in eFMS were not resolved timely. USPS policy requires repair work to be reported and tracked through the project manager, regardless of the dollar amount or the responsibility.²¹

- Maintenance management did not provide sufficient oversight to ensure housekeeping inspections were completed as required. Facilities under 25,000 square feet are required to perform quarterly self-assessments and maintenance managers are required to follow up yearly.²²
- Employees did not always display the flag, lower it after dusk, or illuminate it as required because they were not properly trained on the policy for displaying the flag²³ or they did not notice that it was not illuminated.

Attention to these maintenance, safety, and security deficiencies could 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. It could also improve employee morale and reduce employee turnover. The post office lobby provides customers with their first and most lasting impression of the USPS; therefore, its appearance, convenience, and efficiency directly affect the USPS' public image. Poorly maintained and unappealing lobbies can reduce brand loyalty, which affects revenue.

Customer Complaints

The USPS must improve procedures for monitoring local customer complaints. We found 22 of 39 facilities (56 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 USPS requires facilities to maintain a customer complaint log and respond to complaints within a specified timeframe.²⁴ 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 USPS' brand.

In our previous facility condition review reports,²⁵ the OIG noted manual customer complaint logs are not maintained at all retail facilities. We recommended USPS 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, Western Area management communicated the contents of the June memorandum to district management, who confirmed they disseminated it to every facility. However, log maintenance issues still exist.

²¹ *Standard Operating Procedures for HUB Repairs and Alterations*, Section 1.3, January 2014.

²² Handbook MS-47, *Housekeeping Postal Facilities*, Section 4.1, August 2001.

²³ Flag Display, 4 U.S. Code, Chapter 1.

²⁴ *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 USPS to make initial customer contact within 1 business day of receiving a complaint and issue a final response within 3 business days.

²⁵ *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); *Facility Condition Reviews – Eastern Area* (Report Number SM-AR-17-004, dated May 10, 2017); and *Facility Condition Reviews – Pacific Area* (Report Number SM-AR-17-007, dated September 6, 2017).

Workplace Environment and Workplace Violence Policies

The USPS must improve the process for displaying required information relating to workplace environment, violence, and emergency preparedness policies. Twenty-five facilities (64 percent) did not display workplace environment posters and eight (21 percent) did not display workplace violence posters.²⁶

Specifically, we observed the following:

- Sixteen facilities (41 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).²⁷
- Fifteen facilities (38 percent) did not display Poster CA-10, *What a Federal Employee Should Do When Injured at Work*.²⁸
- Seven facilities (18 percent) did not display the *Zero Tolerance Policy and Reporting Procedures* poster.²⁹
- Nine facilities (23 percent) did not have emergency contact numbers next to each telephone.
- Five facilities (13 percent) did not display the Fire Prevention Plan (FPP)³⁰ as required at postal facilities with more than 10 employees.
- Three facilities (8 percent) did not display Poster 7, *Rules and Regulations Governing Conduct on Postal Property*.³¹
- Three facilities (8 percent) did not display an Emergency Action Plan (EAP)³² plan at postal facilities with more than 10 employees.
- Six facilities (15 percent) did not display the OIG poster,³³ 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, personnel 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 or of their rights and responsibilities regarding the zero tolerance policy.

26 Some facilities were missing multiple posters.

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

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

29 *Threat Assessment Team Guide*, Publication 108, dated May 2015, requires the *Zero Tolerance Policy and Reporting Procedures* poster to be issued to employees by the second quarter 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.

30 EL-801 Section 8-18 (d).

31 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 USPS. Section 124.1 requires Poster 7 to be displayed in a conspicuous place on all such property.

32 EL-801 Section 8-18 (c).

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

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 the employees.

Handicap Accessibility

All facilities provided handicap accessibility. The USPS should continue its efforts to promote accessibility to employees and customers with disabilities.

Recommendations

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

We recommend the Vice President, Western Area, in coordination with the Vice President, Facilities:

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

We recommend the Vice President, Western Area:

2. Instruct district managers to ensure local management at retail facilities comply with policies and procedures pertaining to complaint resolution, so customer complaints are recorded, tracked, and resolved timely.
3. Reiterate policy instructing retail facilities personnel to report all applicable safety, security, and maintenance issues to the electronic Facilities Management System; and direct district management to monitor the status of all reported issues through completion.
4. Direct district maintenance managers to ensure that retail facilities with Postal Service provided custodial services complete and submit a Postal Service Form 4851, Housekeeping Inspections, quarterly as required.
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. Provide safety inspection training to district safety personnel and local management.

Management's Comments

Management agreed with our findings, recommendations, and other impact amount related to physical safety and security concerns.

Regarding recommendation 1, management stated that the Western Area, in conjunction with Facilities, has developed an action plan to address concerns identified during our review, including a checklist to track and ensure deficiencies are corrected. The target implementation date is December 31, 2017.

Regarding recommendation 2, management stated that they issued a memo to district managers communicating the expectation to maintain a Complaint Handling Log. In addition, management conducted training at all offices along with 12 random follow-up audits per month. Management further stated they will publish an article to reinforce the need to provide customers with a positive experience via the Complaint Handling Log and update Customer Experience Local Operations Center operating instructions

to include adherence to using the log to document customer complaints and inquiries. The target implementation date is March 1, 2018.

Regarding recommendation 3, management stated they previously issued directives to all Western Area retail facilities personnel on proper procedures for reporting issues in eFMS and that area maintenance will reissue the procedures to district managers for redistribution to all postmasters. Additionally, management stated that all postmasters and field maintenance managers will review the *Postmaster's Guide to Housekeeping and Maintenance* webinar, which covers facility maintenance and housekeeping guidelines. The target implementation date is September 30, 2017.

Regarding recommendation 4, management stated the area vice president's memorandum directs district managers, the managers of Operations Program Support, and field maintenance managers to reiterate to postmasters the need to complete housekeeping inspections. Their requirement will be to forward PS Forms 4851 to the district maintenance manager for review. The target implementation date is September 30, 2017.

Regarding recommendation 5, management stated that the area will communicate to district managers the need for installation heads to conduct monthly inspections of fire extinguishers and that the oversight mechanism for compliance will be the Fire Inspection Completion report that will be populated during required periodic fire inspections. Management further stated that current unit closeout procedures include a certification process to ensure vehicles are locked and secured. The target implementation date is September 1, 2017.

Regarding recommendation 6, management stated the area safety manager will work with the districts to ensure each facility installation head or facility safety coordinator is assigned to conduct inspections according to guidelines. In addition, the installation head and/or facility safety coordinator along with district safety personnel will complete the required safety and health inspections timely using the Safety Toolkit checklist and submit quarterly reports to the district tracking compliance to ensure inspections has been conducted at each facility. The target implementation date is September 1, 2017.

With regard to the other impact amount, management noted that OSHA uses personal judgment when issuing fines that include, but is not limited to, the employer's good faith effort to keep employees safe. Management further stated that OSHA does not always fine for each incident, it can often group similar deficiencies together, and there are instances where OSHA issues citations with zero dollar penalties.

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 recommendations 1 through 4, management stated they have taken some corrective actions to address the concerns raised in the report; however, management did not provide supporting documentation to the OIG. As such, management will need to provide this information to close these recommendations.

Regarding recommendation 5, management noted they plan to address issues pertaining to fire extinguishers and security standards for vehicles; however, they did not comment on issues related to maintenance and housekeeping standards and the display of required posters. As such, management will need to provide corrective actions for all issues for closure of this recommendation.

Regarding the other impact amount, we acknowledge that the Postal Service may not be fined for each deficiency found by OSHA; however, the overall intent is to quantify the Postal Service's risk exposure as a result of the deficiencies found in our audit. As such, we conservatively estimated the potential fine amount OSHA could levy against the Postal Service. In addition to reducing potential OSHA fines, attention to these issues could reduce the risk of injuries to customers and employees and related costs, such as workers' compensation claims; loss of work and productivity; and lawsuits, which we did not include in the other impact amount.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

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Appendix A: Additional Information

Background

The USPS 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 Western Area has 7,187 retail facilities — 5,488 of them are leased and 1,648 are owned. The USPS 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 USPS and is the only close-up view of postal operations for many customers; therefore, its appearance, convenience, and efficiency directly affect the USPS' public image.

The USPS is required to maintain a safe environment for both employees and customers. In addition, like any other employer, the USPS must follow federal OSHA safety laws. The USPS 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 final area audit in a series of audits assessing retail facility conditions nationwide.

Objective, Scope, and Methodology

Our objective was to determine if USPS management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities in the Western Area.

To accomplish our objective we:

- Conducted unannounced site visits at 39 facilities from April 2016 through June 2017 (see [Table 3](#)).
- Judgmentally selected 39 facilities from five districts — 15 based on OIG Facilities Risk Model metrics related to maintenance and safety and 24 based on the work of other OIG teams.
- Used an OIG-developed checklist focused on facility appearance, safety and security, customer complaints, workplace environment and violence, and handicap accessibility.
- Interviewed facility managers and USPS personnel about inspections, policies and procedures, and other matters relating to facility management.
- Reviewed facility repair and maintenance requests entered into eFMS³⁴ and the facility and safety inspection results.

³⁴ 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 USPS property-leasing program.

- Analyzed prior OSHA fines assessed to the Postal Service to determine the average fine amount and calculated the potential risk of OSHA fines at the 39 facilities visited.

Table 3. Facilities Visited in Western Area

No.	District	Leased/ Owned	Unit	City, State	Zip Code
1	Arizona	Owned	Apache Junction	Apache Junction, AZ	85120-9998
2	Arizona	Owned	Globe Post Office*	Globe, AZ	85501-9998
3	Arizona	Owned	Phoenix Washington Station*	Phoenix, AZ	85021-9998
4	Arizona	Leased	Tonto Basin Post Office*	Tonto, AZ	85553-9996
5	Arizona	Leased	Wikieup Post Office*	Wikieup, AZ	85360-9600
6	Arizona	Owned	Anthony Post Office	Anthony, NM	88021-9998
7	Arizona	Owned	Yucca Post Office*	Yucca, AZ	86438-9997
8	Central Plains	Owned	Omaha Main Office-P&DC	Omaha, NE	68108-9630
9	Colorado/Wyoming	Owned	Aurora Main Office	Aurora, CO	80017-9998
10	Colorado/Wyoming	Owned	Aurora Tower Station	Centennial , CO	80015-9998
11	Colorado/Wyoming	Owned	Boulder - Valmont Station	Boulder, CO	80301-9998
12	Colorado/Wyoming	Owned	Casper Post Office	Casper, WY	82609-9998
13	Colorado/Wyoming	Owned	Castle Rock Main Office	Castle Rock, CO	80104-9998
14	Colorado/Wyoming	Leased	Cimmarron Main Office	Cimmarron, CO	81220-9990
15	Colorado/Wyoming	Leased	Colorado Springs - Rockrimmon Station	Colorado Springs, CO	80919-2401
16	Colorado/Wyoming	Owned	Colorado Springs Cheyenne Mountain Station	Colorado Springs, CO	80906-1933
17	Colorado/Wyoming	Owned	Denver Lakewood Branch	Lakewood, CO	80226-9998
18	Colorado/Wyoming	Owned	Denver Montbello Station	Denver, CO	80239-9998
19	Colorado/Wyoming	Owned	Denver Sullivan Station	Denver, CO	80237-9998
20	Colorado/Wyoming	Owned	Denver University Park Station	Denver, CO	80210-9998
21	Colorado/Wyoming	Leased	Englewood Greenwood Village Branch	Greenwood Village, CO	80112-9998
22	Colorado/Wyoming	Owned	Fort Collins Aspen Station	Fort Collins, CO	80525-9998
23	Colorado/Wyoming	Owned	Golden Main Office	Golden, CO	80401-9996
24	Colorado/Wyoming	Owned	Littleton Columbine Hills Branch	Littleton, CO	80123-3180
25	Colorado/Wyoming	Owned	Loveland Main Office	Loveland, CO	80538-9998
26	Colorado/Wyoming	Owned	Pueblo Main Office	Pueblo, CO	81008-2025
27	Colorado/Wyoming	Owned	Westminster Main Office	Westminster, CO	80031-9998

No.	District	Leased/ Owned	Unit	City, State	Zip Code
28	Colorado/Wyoming	Owned	Drake Post Office*	Drake, CO	80515-9997
29	Colorado/Wyoming	Leased	Larkspur Post Office*	Larkspur, CO	80118-9998
30	Colorado/Wyoming	Leased	Livermore Post Office*	Livermore, CO	80536-9997
31	Colorado/Wyoming	Owned	Ovid Post Office*	Ovid, CO	80744-9500
32	Colorado/Wyoming	Leased	Saratoga Post Office*	Saratoga, WY	82331-9990
33	Mid-America	Leased	Bonner Springs Post Office*	Bonner, KS	66012-9998
34	Mid-America	Leased	Fontana Post Office*	Fontana, KS	66026-9998
35	Mid-America	Owned	Kansas City Civic Center Station*	Kansas City, KS	66101-2206
36	Mid-America	Owned	Kansas City Robert L. Roberts*	Kansas City, KS	66104-9998
37	Mid-America	Owned	Waldron Post Office*	Waldron, MO	64092-9998
38	Portland	Owned	Beaverton Aloha Branch	Beaverton, OR	97007-2869
39	Portland	Owned	Lake Oswego Lake Grove Station	Lake Oswego, OR	97035-6222

Source: Judgmentally selected 39 facilities.

We conducted this performance audit from May through September 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 August 15, 2017, and included their comments where appropriate.

We obtained facility information from the OIG Facilities' Risk Model and compared our 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
<i>Facility Condition Reviews – Pacific Area</i>	Determine if USPS management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities.	SM-AR-17-007	9/6/2017	None
<i>Facility Condition Reviews – Eastern Area</i>	Determine if USPS management adhered to building maintenance, safety, and security standards, and employee working condition requirements at retail facilities.	SM-AR-17-004	5/10/2017	None
<i>Facility Condition Reviews – Southern Area</i>	Determine if USPS 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 USPS 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 million
<i>Facility Condition Reviews – Great Lakes Area</i>	Determine if USPS 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 USPS management adhered to building maintenance, safety and security standards, and employee working condition requirements at retail facilities.	SM-AR-16-009	7/18/2016	None
<i>Working Conditions at the Jal Post Office</i>	Investigate reported poor working conditions at the Jal Post Office in New Mexico.	HR-MA-15-004	9/2/2015	None
<i>Deputy Postmaster General Use of Data</i>	Determine whether the deputy postmaster general effectively used 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 OIG Facilities Risk Model-Selected Facilities

District	Arizona					Colorado / Wyoming					Mid-America								
Facility	Globe Post Office	Tonto Basin Post Office	Washington Station	Wikieup Post Office	Yucca Post Office	Drake Post Office	Larkspur Post Office	Livermore Post Office	Ovid Post Office	Saratoga Post Office	Bonner Springs Post Office	Fontana Post Office	Civic Center Station (KCK)	Robert L. Roberts Post Office (KCK)	Waldron Post Office	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
Building Appearance																			
Is the building clean and well maintained?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	D	✓	✓	13	2	0	13%
Are paint, plaster, wall, floor, and ceiling coverings in good condition?	D	D	D	D	D	D	✓	✓	D	✓	✓	✓	D	D	✓	6	9	0	60%
Is the lobby inviting?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	15	0	0	0%
Is landscaping well maintained and is all excessive equipment removed from the facility?	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	13	2	0	13%
Is there sufficient lighting inside/outside the facility?	✓	✓	D	D	✓	✓	✓	✓	✓	✓	✓	D	✓	D	✓	11	4	0	27%
Are docks, platforms, and parking areas properly marked?	D	D	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	D	D	✓	10	5	0	33%
Building Safety and Security																			
Are non-retail doors of the facility secured and are all vehicles locked and empty of mail?	✓	✓	D	✓	X ¹	✓	D	X ¹	✓	✓	D	X ¹	✓	✓	✓	9	3	3	20%
Is the building free of obvious OSHA safety hazards?	D	D	D	D	D	D	D	D	✓	D	D	D	D	D	D	1	14	0	93%
Are all other safety concerns in working order?	D	✓	D	✓	✓	✓	✓	✓	✓	✓	D	D	✓	✓	✓	11	4	0	27%
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	2	13	0	87%
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	D	D	D	D	✓	D	D	D	✓	D	2	13	0	87%

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

District	Arizona					Colorado / Wyoming					Mid-America								
Facility	Globe Post Office	Tonto Basin Post Office	Washington Station	Wikieup Post Office	Yucca Post Office	Drake Post Office	Larkspur Post Office	Livermore Post Office	Ovid Post Office	Saratoga Post Office	Bonner Springs Post Office	Fontana Post Office	Civic Center Station (KCK)	Robert L. Roberts Post Office (KCK)	Waldron Post Office	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
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	4	11	0	73%
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	1	14	0	93%
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	D	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	✓	✓	X ¹	3	1	11	7%
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	X ¹	D	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	X ¹	✓	✓	X ¹	2	2	11	13%
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	11	4	0	27%
Although not required, does the facility have an OIG poster displayed?	D	✓	✓	D	✓	D	✓	✓	✓	✓	✓	✓	D	✓	✓	11	4	0	27%
Workplace Violence																			
Does the facility have the Zero Tolerance Policy and Reporting Procedures poster displayed?	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	D	D	D	D	✓	10	5	0	33%
Does the facility have a 7 Rules and Regulations Governing Conduct on Postal Property poster displayed?	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	14	1	0	7%
Other																			
Is the facility handicap accessible?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	15	0	0	0%

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

District	Arizona					Colorado / Wyoming					Mid-America								
Facility	Globe Post Office	Tonto Basin Post Office	Washington Station	Wikieup Post Office	Yucca Post Office	Drake Post Office	Larkspur Post Office	Livermore Post Office	Ovid Post Office	Saratoga Post Office	Bonner Springs Post Office	Fontana Post Office	Civic Center Station (KCK)	Robert L. Roberts Post Office (KCK)	Waldron Post Office	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %
Totals																			
No Issue	10	10	7	7	11	10	13	12	15	16	9	8	11	13	12				
Deficiency	10	8	13	11	6	8	5	5	3	2	9	9	9	7	6				
Not Applicable or Not Observed	0	2	0	2	3	2	2	3	2	2	2	3	0	0	2				

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

Table 5. Summary of Work Performed By Other OIG Teams

District	Arizona		Central Plains	Colorado / Wyoming																			Portland						
Facility	Anthony Post Office	Apache Junction	Omaha Main Office - P&DC	Castle Rock Main Office	Cimmarron Main Office	Aurora Main Office	Aurora Tower Station	Boulder - Valmont Station	Colorado Springs - Rockrimmon Station	Denver Lakewood Branch	Denver Montbello Station	Denver Sullivan Station	Denver University Park Station	Englewood Greenwood Village Branch	Fort Collins Aspen Station	Golden Main Office	Littleton Columbine Hills Branch	Loveland Main Office	Pueblo Main Office	Westminster Main Office	Casper Post Office	Colorado Springs Cheyenne Mountain Station	Beaverton Aloha Branch	Lake Oswego Lake Grove Station	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %	
Building Appearance																													
Is the building clean and well maintained?	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	23	1	0	4%
Are paint, plaster, wall, floor, and ceiling coverings in good condition?	✓	✓	✓	✓	D	✓	D	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	D	D	✓	D	D	D	✓	17	7	0	29%
Is the lobby inviting?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	23	1	0	4%
Is landscaping well maintained and is all excessive equipment removed from the facility?	✓	✓	✓	✓	✓	✓	✓	D	X ²	✓	D	✓	X ²	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	20	2	2	8%
Is there sufficient lighting inside/outside the facility?	✓	X ²	✓	✓	D	✓	✓	✓	D	✓	D	✓	D	✓	✓	✓	✓	✓	D	✓	✓	✓	D	✓	17	6	1	25%	
Are docks, platforms, and parking areas properly marked?	✓	✓	✓	D	✓	D	✓	✓	✓	D	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	20	4	0	17%	
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	X ²	D	D	D	✓	✓	D	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	15	7	2	29%

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

District	Arizona		Central Plains	Colorado / Wyoming																				Portland					
Facility	Anthony Post Office	Apache Junction	Omaha Main Office - P&DC	Castle Rock Main Office	Cimmarron Main Office	Aurora Main Office	Aurora Tower Station	Boulder - Valmont Station	Colorado Springs - Rockrimmon Station	Denver Lakewood Branch	Denver Montbello Station	Denver Sullivan Station	Denver University Park Station	Englewood Greenwood Village Branch	Fort Collins Aspen Station	Golden Main Office	Littleton Columbine Hills Branch	Loveland Main Office	Pueblo Main Office	Westminster Main Office	Casper Post Office	Colorado Springs Cheyenne Mountain Station	Beaverton Aloha Branch	Lake Oswego Lake Grove Station	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %	
Is the building free of obvious OSHA safety hazards?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	22	2	0	8%
Are all other safety concerns in working order?	✓	✓	✓	D	✓	✓	✓	✓	D	D	D	D	D	✓	✓	✓	D	✓	D	✓	✓	✓	✓	✓	✓	16	8	0	33%
Customer Complaints																													
Are one or more customer complaint control logs maintained at the facility?	✓	D	✓	✓	D	✓	X ²	D	D	X ²	✓	X ²	X ²	D	✓	X ²	X ²	✓	D	✓	D	D	D	✓	9	9	6	38%	
Are all initial contacts and final responses with the customer made within required timeframes, after receiving the comment or complaint?	✓	D	✓	✓	D	X ²	X ²	D	D	X ²	✓	X ²	X ²	D	✓	X ²	X ²	✓	D	✓	D	D	D	✓	8	9	7	38%	
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	✓	✓	✓	✓	X ²	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	19	4	1	17%
Are the 3165 (English) and 3167 (Spanish) OSHA Posters on display?	D	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	22	2	0	8%

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

District	Arizona		Central Plains	Colorado / Wyoming																				Portland					
Facility	Anthony Post Office	Apache Junction	Omaha Main Office - P&DC	Castle Rock Main Office	Cimmarron Main Office	Aurora Main Office	Aurora Tower Station	Boulder - Valmont Station	Colorado Springs - Rockrimmon Station	Denver Lakewood Branch	Denver Montbello Station	Denver Sullivan Station	Denver University Park Station	Englewood Greenwood Village Branch	Fort Collins Aspen Station	Golden Main Office	Littleton Columbine Hills Branch	Loveland Main Office	Pueblo Main Office	Westminster Main Office	Casper Post Office	Colorado Springs Cheyenne Mountain Station	Beaverton Aloha Branch	Lake Oswego Lake Grove Station	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %	
The facility Emergency Action Plan (EAP) (ELM 820) is required at facilities with more than 10 employees. Is the EAP posted for review by employees?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	22	2	0	8%	
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	✓	21	3	0	13%	
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	X ²	D	D	X ²	D	X ²	✓	✓	✓	X ²	D	✓	✓	✓	✓	✓	✓	✓	14	5	5	21%	
Although not required, does the facility have an OIG poster displayed?	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	✓	✓	22	2	0	8%		

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

District	Arizona		Central Plains	Colorado / Wyoming																				Portland						
Facility	Anthony Post Office	Apache Junction	Omaha Main Office - P&DC	Castle Rock Main Office	Cimarron Main Office	Aurora Main Office	Aurora Tower Station	Boulder - Valmont Station	Colorado Springs - Rockrimmon Station	Denver Lakewood Branch	Denver Montbello Station	Denver Sullivan Station	Denver University Park Station	Englewood Greenwood Village Branch	Fort Collins Aspen Station	Golden Main Office	Littleton Columbine Hills Branch	Loveland Main Office	Pueblo Main Office	Westminster Main Office	Casper Post Office	Colorado Springs Cheyenne Mountain Station	Beaverton Aloha Branch	Lake Oswego Lake Grove Station	No Issue	Deficiency	Not Applicable or Not Observed	Deficiency %		
Workplace Violence																														
Does the facility have the Zero Tolerance Policy and Reporting Procedures poster displayed?	✓	✓	✓	✓	✓	✓	X ²	X ²	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	X ²	✓	✓	✓	✓	19	2	3	8%
Does the facility have a 7 Rules and Regulations Governing Conduct on Postal Property poster displayed?	✓	✓	✓	✓	✓	✓	X ²	X ²	✓	✓	D	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	X ²	✓	✓	✓	✓	19	2	3	8%
Other																														
Is the facility handicap accessible?	X ¹	✓	✓	✓	✓	✓	✓	X ²	X ²	✓	X ²	✓	X ²	✓	✓	✓	X ²	✓	✓	✓	✓	X ²	✓	✓	✓	✓	17	0	7	0%
Totals																														
No Issue	17	14	20	16	15	17	13	11	12	14	6	15	13	17	19	17	15	19	14	16	14	17	14	20						
Deficiency	2	4	0	4	5	1	1	6	5	3	13	2	3	3	1	0	2	1	6	4	3	3	6	0						
Not Applicable or Not Observed	1	2	0	0	0	2	6	3	3	3	1	3	4	0	0	3	3	0	0	0	3	0	0	0						

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

Appendix C: Management's Comments



August 30, 2017

LORI LAU DILLARD
DIRECTOR AUDIT OPERATIONS

SUBJECT: Facility Condition Reviews – Western Area
Project Number 17SMG020SM000

The Western Area has reviewed the draft Facility condition Reviews – Western 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. Issues identified at each of the facilities audited have been noted and actions to address these issues have been taken with local management, local maintenance or through the assistance of Facilities through the Facilities Single Source Provider (FSSP).

Management agrees with the average monetary value of \$2,100 for each of the 40 potentially fineable OSHA violations totaling \$84,000 as a conservative worst case scenario. Management would like to raise awareness that OSHA does use personal judgement when issuing fines that do include, but is not limited to the employer's good faith effort to keep employees safe. OSHA does not always fine for each incident and similar deficiencies can often times be grouped together. There are instances where citations are issued with "Zero" dollar penalties.

Recommendations

Recommendation 1

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

Management Response / Action Plan:

Management agrees with this recommendation. The Western Area in conjunction with Facilities has developed an action plan to address concerns identified. A checklist specific to the individual issues identified in the OIG site visits has been created to facilitate tracking and ensuring all deficiencies are corrected (Exhibit 1).

Target Implementation Date:
December 31, 2017

T



Responsible Officials:
Area Safety Manager
Facilities Customer Relations Manager

Recommendation 2

Instruct district managers to ensure local management at retail facilities comply with policies and procedures pertaining to complaint resolution, so customer complaints are recorded, tracked, and resolved timely.

Management Response / Action Plan:

Management agrees with the recommendation and has issued a memo to all District Managers to include the COO Complaint Handling Letter for communicating the expectation to maintain a Complaint Handling Log. In addition, ECC Replication Training was conducted in all offices with a minimum of 12 random follow up audits per month. Audit results are documented and shared at District Marketing Manager and Executive Leadership Meetings. An article will also be published in the Western Word to reinforce the need to provide our customers with a positive experience with documentation via the Complaint Handling Log. Updated Customer Experience Local Operations Center (CELOC) Operating Instructions to include adherence to utilizing the Customer Complaint Log to document customer complaints and inquiries.

Target Implementation Date:
March 1, 2018

Responsible Official:
Western Area Marketing Manager

Recommendation 3

Reiterate policy instructing retail facilities personnel to enter all applicable safety, security, and maintenance issues into the electronic Facilities Management System; and direct district management to monitor the status of all reported issues through completion.

Management Response / Action Plan:

Management agrees with this recommendation. Area and District Maintenance and Operations Programs Support have previously issued directives to all Western Area retail facilities personnel on proper reporting procedures for reporting all applicable safety, security, and maintenance issues into the Facilities Management System (FMS). In addition to the Postmaster tracking of work completion, District Maintenance monitors the status of problems they accept and schedules work completion. Area Maintenance will reissue the proper reporting procedures to all District Managers for their redistribution to all SOMs and Postmasters on September 8, 2017. In addition, all Postmasters and Managers of Field Maintenance will review the Postmaster's Guide to



Housekeeping and Maintenance webinar by September 30, 2017. Topics covered will be key sections of the MS-110, Associate Office Postmaster Facility Maintenance Guidelines, and the MS-47, Housekeeping Postal Facilities.

Target Implementation Date:
September 30, 2017

Responsible Official:
Area Manager Maintenance Operations

Recommendation 4

Direct district maintenance managers to ensure that retail facilities with Postal Service provided custodial services complete and submit Postal Service Form 4851, Housekeeping Inspections, quarterly as required.

Management Response / Action Plan:

Management agrees with this recommendation. The Area Vice President's memo directs District Managers, Managers Operations Programs Support, and Managers Field Maintenance to continue to communicate to all Postmasters of their need to complete their PS Form 4851, Housekeeping Inspection, per the MS-47 guidelines. Their requirement will be to forward those PS Form 4851s to the District Maintenance Manager for review at the LLT, and for filing.

Target Implementation Date:
September 30, 2017

Responsible Official:
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 relation 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.



Western Area Safety will communicate to District Managers of the need for installation heads to conduct monthly inspections of portable fire extinguishers and annotate on Form 4705 according to MS-56, Section 480. The oversight mechanism to ensure compliance will be the Fire Inspection Completion report that will be populated during the periodic fire inspections as outlined in ELM 824. Current unit closeout procedures include a Postmaster certification process to ensure that "VEHICLES ARE FREE OF MAIL, TRASH, & ARE LOCKED & SECURED DAILY."

The daily oversight mechanism is the unit submitting a "POST" indicating that all areas of the closeout are in compliance. If a unit does not submit, Districts will see the office did not "POST", and should contact the unit to determine the cause.

Target Implementation Date:
September 1, 2017

Responsible Official:
Area Human Resource Department
Area Manager Maintenance Operations

Recommendation 6

Provide safety inspection training to district safety personnel and local management.

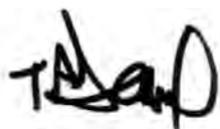
Management Response / Action Plan:

Area Safety will work with District Human Resource Managers to ensure each facility Installation Head and/or Facility Safety Coordinator (FSC) is assigned to conduct inspections per ELM 824 guidelines. The Installation Head and/or FSC along with district safety personnel will complete the required safety and health inspections timely using the appropriate checklist provided by Safety Toolkit. Quarterly reports will be sent to the district tracking compliance to ensure 100% by the end of FY 2018.

Target Implementation Date:
September 1, 2017

Responsible Official:
Western Area Human Resources


Gregory G. Graves
Vice President
Western Area Operations


Tom A. Samra
Vice President
Facilities

cc: Manager, Corporate Audit Response Management



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