Service Performance of Election and Political Mail During the 2024 General Election

AUDIT REPORT
Report Number 24-143-R25 | April 21, 2025

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Highlights

Background

The U.S. Postal Service is responsible for processing, transporting, and delivering the nation's Election and Political Mail. The Postal Service has specific policies and procedures on the proper acceptance, processing, delivery, and documentation of Election and Political Mail.

What We Did

Our objective was to evaluate the service performance and visibility of Election and Political Mail during the 2024 general election. For this audit, we reviewed Election and Political Mail policies and mail tracking methods, analyzed service performance data, and judgmentally selected and conducted observations at 68 mail processing facilities and 947 delivery units during the 2024 general election season.

What We Found

Overall, the Postal Service significantly exceeded service performance goals for Election and most Political Mail, but opportunities existed for the Postal Service to improve tracking of Ballot Mail within its network. The Postal Service applied its "extraordinary measures" to expedite handling of Ballot Mail. In fact, we found the Postal Service provided service above rates charged for certain ballots and late arriving Political Mail. The Postal Service could have potentially received $15.4 million more in revenue if it charged rates in line with the service provided on these ballots. When we observed non-compliance with Election and Political Mail policies and procedures, we found it was caused by confusion in the field over new, electronic processes or temporary changes in the mail flow due to the election. We did not see widespread instances of delayed Election or Political Mail in delivery units before or after the election, but better controls could lead to more accurate daily reporting on the status of Election and Political Mail from delivery operations.

In addition, the Postal Service estimated that just under 40 million ballots mailed to and from voters did not have performance tracking data. The Postal Service's inability to track ballots negatively impacts its and other interested parties' visibility into the status of ballots in the postal network.

Recommendations and Management's Comments

We made nine recommendations in the report. Postal Service management agreed with six and disagreed with three. Management's comments and our evaluation are at the end of each finding and recommendation. The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the six agreed recommendations as corrective actions should resolve the issues identified. We will work with management through the audit resolution process on the remaining three recommendations. See Appendix D for management's comments in their entirety.

Transmittal Letter

OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

April 21, 2025

MEMORANDUM FOR: STEVEN MONTEITH
CHIEF CUSTOMER AND MARKETING OFFICER AND EXECUTIVE VICE PRESIDENT

DANE COLEMAN
VICE PRESIDENT, PROCESSING OPERATIONS

JOHN MORGAN
VICE PRESIDENT, DELIVERY OPERATIONS

JENNIFER VO
VICE PRESIDENT, RETAIL AND POST OFFICE OPERATIONS

MARGARET PEPE
EXECUTIVE DIRECTOR, PRODUCT SOLUTIONS

GREGORY WHITE
DIRECTOR, OPERATIONS INTEGRATION AND PERFORMANCE EXCELLENCE

ADRIENNE MARSHALL
DIRECTOR, ELECTION AND GOVERNMENT MAIL SERVICES

FROM: Kelly Thresher
Deputy Assistant Inspector General for Field Operations

SUBJECT: Audit Report – Service Performance of Election and Political Mail During the 2024 General Election (Report Number 24-143-R25)

This report presents the results of our audit of Service Performance of Election and Political Mail During the 2024 General Election.

All recommendations require U.S. Postal Service Office of Inspector General (OIG) concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. All 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.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact John Littlejohn, Director, Seasonal Performance and Postal Regulatory Commission, or me at 703-248-2100.

Attachment

cc: Postmaster General
Chief Processing and Distribution Officer and Executive V.P.
Chief Retail and Delivery Officer and Executive V.P.
Chief Logistics and Infrastructure Officer and Executive V.P.
Chief Performance Officer and Executive V.P.
General Counsel and Executive V.P.
Logistics V.P.
Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the Service Performance of Election and Political Mail During the 2024 General Election (Project Number 24-143). Our objective was to evaluate the U.S. Postal Service's performance during the 2024 general election and the visibility of Election and Political Mail in the Postal Service's network. See Appendix A for additional information about this audit.

Background

The United States is characterized by a highly decentralized election administration system. The Constitution explicitly gives each state the power to administer federal congressional elections as they see fit, which states typically carry out through boards of election.[1] The number of boards of election varies in each state and can range from one office to over a thousand offices. There are about 8,000 boards of election offices throughout the United States and U.S. Territories.[2]

Postal Service Management of Election and Political Mail

The Postal Service is responsible for processing, transporting, and delivering the nation's Election and Political Mail. Election Mail is any item mailed to or from authorized election officials that enables citizens to participate in the voting process. Election Mail includes mail-in ballots, balloting materials, voter registration cards, mail-in ballot applications, and polling place notifications.[3] Political Mail is any material mailed for campaign purposes by a registered political candidate, campaign committee, committee of a political party, or a political action committee or organization engaging in issue advocacy or voter mobilization.

The Postal Service established an Election and Government Mail Services (EGMS) team that is responsible for coordinating Election Mail policies, resources, and preparedness. The team leads cross-functional collaboration with the Chief Processing and Distribution Office (CPDO) and Chief Retail and Delivery Office (CRDO) to develop election and government mail policy. This team educates postal employees and election officials on the Postal Service's policies and procedures for the proper handling of Election and Political Mail and monitors related activity to resolve issues as they arise.

To help Postal Service employees understand their role in the timely processing, special handling, and delivery of Election and Political Mail, EGMS developed the 2024 Election Mail and Political Mail Guidebook (2024 Guidebook). The 2024 Guidebook includes the Processing Operations Management Order (POMO)[4] and standard work instructions.

Election and Political Mail Observations

From September 16 through November 6, 2024, we conducted a total of 1,022 observations at 68 mail processing facilities[5] and 947 delivery units in all 50 states and the District of Columbia.[6] We focused our observations and inquiries to evaluate the mail processing facilities' and delivery units' compliance with specific processes that are relevant to ensuring proper handling and timely processing and delivery of Election and Political Mail. We also incorporated oversight of initiatives created as part of the Postal Service's ten-year strategic plan, Delivering for America, into our selection methodology for mail processing facilities and delivery units (see Appendix A for details of our observation methodology). We provided the Postal Service with our observations on a weekly basis so that issues could be corrected in real time, rather than after the election. When applicable, we included corrective actions taken by the Postal Service as a result of our observations throughout this report.

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1   See more at *States and Election Clause*, Constitution Annotated, States and Elections Clause | Constitution Annotated | Congress.gov | Library of Congress.
2   U.S. Territories include Puerto Rico, American Samoa, U.S. Virgin Islands, and Guam.
3   Throughout this report, we reference Ballot Mail as a subset of all Election Mail.
4   The POMO provides the guidance, procedures, and instructions related to processing and distribution for the Election Mail and Political Mail cycle.
5   We visited seven mail processing facilities on two occasions, resulting in 75 observations conducted at mail processing facilities.
6   We also conducted a review of delivery units to assess ballots in the network after Election Day. For full results, see Appendix B.

Findings Summary

For the mail that could be tracked for service performance, the Postal Service significantly exceeded timeliness targets for the processing and delivery of Election Mail and most Political Mail. In some cases, the Postal Service processed Marketing Mail at a service level above what was paid for. Opportunities exist to improve communication and reporting, especially as changes to the network roll out in advance of the next election. There are also opportunities for the Postal Service to improve visibility of Ballot Mail to increase transparency for the Postal Service, voters, and boards of election.

Finding #1: Election and Political Mail Service Performance During the 2024 General Election

The Postal Service processed full-service[7] Election and Political Mail on time during the 2024 general election cycle. The Postal Service also advanced Marketing Mail ballots and late-arriving Political Mail to ensure timely delivery.

Mail delivery performance is measured based on processing performance. The Postal Service measures performance for Election and Political Mail based on the number of days from the first postal scan, when the Postal Service receives the mailpiece, to the last postal scan on mail processing equipment.[8] For our analysis of Election and Political Mail, the First-Class Mail service standard ranged from 1-5 days, and the Marketing Mail service standard ranged from 2-25 days, depending on how far the piece had to travel.[9]

Election Mail

The Postal Service processed and tracked service performance for 59.4 million pieces of Ballot Mail from September 1 through November 15, 2024, with an overall on-time score of 97.3 percent, well above targets. Specifically, for this period, the Postal Service processed 43.7 million outgoing ballots to voters and 15.7 million incoming ballots from voters. In addition, non-ballot Election Mail met service standards 97.5 percent of the time (see Table 1).

Table 1. Election Mail Volume and Service Performance From September 1 to November 15, 2024

Mail Class Type	Ballot Mail Volume	Ballot Mail On-Time Score	Non-Ballot Election Mail Volume	Non-Ballot Election On-Time Score	On-Time Target
First-Class Mail	4,785,520	96.5%	6,237,929	94.3%	88.0%
Marketing Mail	38,949,616	97.8%	46,095,889	97.9%	94.0%
Return Ballots to Boards of Election*	15,698,263	96.3%	–	–	88.0%
Total	**59,433,399**	**97.3%**	**52,333,818**	**97.5%**	**–**

Source: OIG analysis of Postal Service data from Informed Visibility.
*Note: This volume includes First-Class Mail categories such as Business Reply Mail.

Overall, the Postal Service processed more Ballot Mail compared to the 2022 mid-term election cycle, and its percentage of all Ballot Mail delivered on time improved. Specifically, the volume of Ballot Mail during the 2024 general election increased by 8.8 percent compared to the 2022 mid-term election.[10] The on-time percentage for ballots going to voters improved from 96.7 percent during the 2022 mid-term election to 97.6 percent this election cycle. The on-time percentage for return ballots declined slightly from 97.5 percent on time during the 2022 mid-term election to 96.3 percent during this election cycle.

The Postal Service processed around 34.2 million more ballots sent as Marketing Mail than First-Class Mail, from September 1 through November 15, 2024. Despite the longer service standard for Marketing Mail ballots, these ballots were processed and delivered at speeds similar to First-Class Mail. The average processing time for Marketing Mail ballots was 1.96 days, which was slightly longer than the First-Class Mail ballots' average of 1.8 days.

The Postal Service's policy is to prioritize Election Mail regardless of how much the sender pays or what class of mail the sender uses. Specifically, Election Mail entered as Marketing Mail is advanced ahead

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7   Full-service mail includes visibility tools that allow the Postal Service to track its progress through the network.

8   Throughout this report, "on-time score" refers to the on-time processing performance percentage. Mail is assumed to be delivered within a day of the last processing scan.

9   The range for Marketing Mail ballots was 2-18 days, and the range for non-ballot Election and Political Mail was 2-25 days. For example, there was a piece of Marketing Mail that traveled from Juneau, Alaska, to the U.S. Virgin Islands, with a service standard of 25 days. In contrast, Marketing Mail sent from and bound for Metro Atlanta, Georgia, had a 2-day service standard.

10   During the period from September 1 to November 15, 2022, the total volume of Ballot Mail was 54,643,179. Of this total, 39,427,035 were outgoing ballots to voters and 15,216,144 were return ballots to the boards of election.

of all other USPS Marketing Mail and is expected to be processed so that it is generally in line with First-Class Mail delivery standards. The Domestic Mail Manual (DMM) allows mailers to send Ballot Mail going to voters as First-Class Mail or Marketing Mail.[11] The Postal Service is granted the specific power to prescribe the amount of postage collected for mail.[12] Augmenting the DMM to only allow Ballot Mail going to voters to be sent as First-Class Mail could enable the Postal Service to recoup more of its costs for the special handling given Ballot Mail.

While the prioritization of ballots helps ensure they are processed and delivered on time or early, this can impact revenue for the Postal Service. Mailers do not have an incentive to pay for First-Class Mail service if the less expensive Marketing Mail product will arrive in roughly the same amount of time; only 11 percent of ballots mailed to voters were sent as First-Class Mail. The Postal Service receives about 31 cents less in revenue per piece for Marketing Mail than it does for First-Class Mail. Therefore, the Postal Service could have potentially earned an additional $15.4 million in revenue for the ballots classified as Marketing Mail that received expedited processing during the election cycle.[13]

Political Mail

The Postal Service exceeded service performance goals for most Political Mail. Specifically, for the period from September 1 to November 15, 2024, the Postal Service processed almost 1.5 billion pieces of Political Mail with on-time processing scores ranging from 85.1 percent to 97.3 percent. While First-Class Political Mail was below processing targets, it accounted for less than one percent of Political Mail volume overall (see Table 2).

Table 2. Political Mail Volume and Service Performance From September 1 to November 15, 2024

Mail Class Type	Volume	On-Time Score	On-Time Target
First-Class Mail	13,196,980	85.1%	88.0%
Marketing Mail	1,472,265,483	97.3%	94.0%
Total	1,485,462,463	97.2%	–

Source: OIG analysis of Postal Service data from Informed Visibility.

While conducting our field observations, we saw the Postal Service used extra efforts to deliver late arriving Political Mail before the election. During the week of the election, we observed Political Marketing Mail drop shipments[14] at two mail processing facilities. One facility received a drop shipment of about 48,000 pieces of Political Mail on the afternoon of November 4, 2024. In another facility, we observed a drop shipment of about 222,000 pieces of Political Mail on the morning of November 5, 2024 (Election Day). Personnel at both locations completed the required Late Arriving Political Mail Report and immediately processed the mail for delivery. Although the service standard for Marketing Mail is from 3 to 27 days, both mail processing facilities expedited the processing of this mail on the same day it arrived, which upgraded the service standard for these mailpieces.

The Postal Service policy[15] states staff should notify mailers that every effort will be made to deliver Marketing Political Mail by Election Day. This guidance identifies Political Mail as late arriving when a customer drops it off the weekend before the election, on the day of or after the election, after acceptance hours, and anytime the mail is found unattended on a dock. However, the policy does not include a requirement or provision for recovery of

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11   Domestic Mail Manual, Section 703.8.2.1.
12   See 39 U.S.C. § 404(a)(2).
13   Specifically, if the Postal Service had charged First-Class Mail prices on the 50.0 million ballots sent from September 1 to November 30, 2024, as Marketing Mail ballots, it would have earned an additional $15,400,055.
14   The movement of a mailer's product on private (non-postal) transportation from the point of production to a postal facility located closer to the destination of that product.
15   *United States Postal Service Election Mail and Political Mail Guidebook 2024*, Completing the Late Arriving Political Mail Report.

costs associated with the expedited handling of late arriving Political Mail.

Processing, transporting, and delivering mail dropped with the Postal Service so close to a federal election can create an undue burden, especially when facilities are already prioritizing timely Ballot Mail delivery, consistent with policy. The Postal Service could identify ways to limit delivery expectations for Political Mail within a certain period or generate additional revenue for late arriving Political Mail.

Recommendation #1

We recommend the **Chief Customer and Marketing Officer and Executive Vice President** charge First-Class Mail rates for Ballot Mail because service is comparable to or exceeds First-Class Mail service.

Recommendation #2

We recommend the **Executive Director, Product Solutions**, assess options to charge for the premium service provided for late arriving Political Mail or clarify policy around delivery expectations for this mail.

Postal Service Response

Management agreed with this finding, disagreed with recommendation 1, and agreed with recommendation 2. Regarding the monetary impact, management disagreed, and stated the approach used to calculate monetary impact assumed there would not be a change in volume if the price of Ballot Mail increased.

Regarding the finding, while management agreed that it processed Election and Political Mail on time during the 2024 general election cycle, it expressed environmental and political concerns that could arise from a requirement to use First-Class Mail standards for outbound Ballot Mail.

Regarding recommendation 1, management stated the Postal Service delivers Ballot Mail entered as Marketing Mail within timeframes comparable to First-Class Mail. Management argued the delivery speed is not the only distinction between the two products as First-Class Mail offers other benefits, such as mail forwarding and return, that can incentivize the use of the service. Management stated this recommendation also failed to recognize that implementation is much more complicated than changing the rate. Management also indicated the recommendation could mean the Postal Service should retroactively charge and collect the difference in rates for Ballot Mail entered as Marketing Mail but receives First-Class Mail standards.

Regarding recommendation 2, management did not agree with assessing options to charge for the premium service provided for late arriving Political Mail but agreed to remove any ambiguous language in documentation and clarify policy around delivery expectations for Political Mail that is deemed late arriving. The target implementation date is August 30, 2025.

OIG Evaluation

The OIG does not consider management's comments responsive to recommendation 1 and views the disagreement as unresolved and will pursue it through the audit resolution process. The OIG considers management's comments responsive to recommendation 2.

Regarding recommendation 1, we acknowledge First-Class Mail service includes other features that could incentivize its use, as insinuated in management's comments, but we maintain that mailers do not have an incentive to pay for First-Class Mail service if the less expensive Marketing Mail product will arrive in roughly the same amount of time. Additionally, our recommendation does not imply the Postal Service should retroactively charge and collect the difference in rates for Ballot Mail entered as Marketing Mail but received First-Class Mail service. If the Postal Service expects to continue to provide First-Class Mail

treatment for Ballot Mail entered as Marketing Mail, we maintain they should charge for that service provided.

Regarding the monetary impact, we calculated how much the Postal Service would have made in this election, if all ballots had been sent as First-Class Mail. We did not project future potential revenue or recommend the Postal Service retroactively charge this postage. We acknowledge that cost is a factor in decisions made by boards of elections but maintain that mailers do not have an incentive to pay for First-Class Mail service if the less expensive Marketing Mail product will arrive in roughly the same amount of time. The Postal Service received about 31 cents less in revenue per piece for ballots sent as Marketing Mail compared to First-Class Mail. For this election cycle, only 11 percent of ballots mailed to voters were sent as First-Class Mail.

Finding #2: Non-Compliance With Election and Political Mail Policies and Procedures

The Postal Service did not always comply with Election and Political Mail policies and procedures. Specifically, management at mail processing facilities did not always meet the requirements to complete the all clear certifications, audit checklist, and Election and Political Mail Log. Personnel at delivery units did not always meet the requirements to complete all clear certifications and the Election and Political Mail Log. There is a risk of improper handling, untimely processing, and late delivery of Election and Political Mail when policies and procedures are not followed.

Mail Processing Facility Compliance

During our observations, we found that management was confused over how and when to report Election and Political Mail in Postal Service facilities. Specifically, USPS moved its all clear certification, audit checklist, and Election and Political Mail Logs online either directly before or during the election cycle, and some facility managers did not understand what was expected of them in the new process.

During our observations, we found issues with the all clear certification, audit checklist, and Election and Political Mail Log.

- **All clear certification:** Management in 45 of 68 (66 percent) mail processing facilities did not correctly complete all clear certifications according to policy.[16] Further, 36 of the 45 facilities had committed[17] Election and/or Political Mail in the facility after management completed the all clear certification, incorrectly indicating it was clear of committed Election and Political Mail.[18]

- **Audit checklist:** We found eight of 68 (12 percent) mail processing facilities visited were not in compliance with the audit checklist requirements.

The checklist items included completion of daily all clear checks after each tour, designation of Election and Political Mail staging areas, and provision of service talks and POMO guidance with all employees. Some of these facilities had several compliance issues within the checklist.

- **Election and Political Mail Log:** We found six of 68 (9 percent) mail processing facilities visited were not in compliance with the requirements to record Election and Political Mail.[19] Some of these facilities had several issues of compliance with the requirements.

According to the POMO,[20] all processing facilities are required to certify daily, on each tour, that the facility is clear of committed Election and Political Mail from September 1 to November 26, 2024. This certification incorporates the Clean Sweep Process checklist to verify all key processing areas are clear of mail. According to the POMO, processing facilities must complete a self-audit daily, using the Election Mail and Political Mail Audit Checklist. The POMO further requires mail processing facilities to log all Election Mail and Political Mail in various areas throughout the facility. A copy of the mailpiece is also required to be retained.

These issues occurred due to a lack of management oversight and unclear communication, leaving facility management unaware of, or confused by changing requirements. Specifically, in this election cycle, the Postal Service changed the reporting for all three items to a new, online process. Some facilities did not complete the online report correctly or make the transition to the online reporting process. There was also conflicting information about the all clear certification and whether all volume or just committed volume should be documented.[21]

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16 Of the 45 facilities, two facilities were visited twice, and, on both occasions, we found that they were not in compliance. Specifically, these facilities were found to have committed Election and Political Mail after management completed the all clear certification.
17 All types of First-Class Mail, Priority Mail and Priority Mail Express are always committed for delivery on the day of receipt.
18 For example, at seven of the 36 facilities, we identified 572 ballots in the Postal Automated Redirection System (PARS) operation that were not reported in the all clear certification. PARS is where mail is directed when it's identified as undeliverable as addressed during processing.
19 Some facilities have multiple issues related to the Political Mail Log.
20 Processing Operation Management Order, updated August 30, 2024.
21 When we asked headquarters for clarification on what volume should be documented, we received two conflicting responses. First, that all Election and Political Mail in a facility should be documented, and then, that all committed Election and Political Mail should be documented.

Postal management did not clearly communicate expectations or user information for these online tools.

Delivery Unit All Clear Certifications

Postal Service standard work instructions[22] require all delivery units to certify twice a day that their unit is clear of Election and Political Mail committed for delivery that day. The AM all clear certifications are due by 2 p.m. local time, and PM all clear certifications are due after the units' retail and/or delivery operations are completed for the day. Our observations demonstrated some offices did not conduct a thorough sweep before submitting the all clear. Specifically, there were 56 (5.9 percent) delivery units that were not clear of committed Election and Political Mail.

We conducted a stratified attribute sampling[23] to determine whether the facilities were completing their certifications twice a day in accordance with instructions. We concluded that at least 69.3 percent of the 8,083 delivery units with six or more routes had either an AM or PM certification failure.[24]

Delivery units did not comply with all clear certification requirements due to a lack of management oversight. Local management did not complete the certifications correctly because it did not certify by the required time, or it certified the unit was all clear before carriers had left or returned for the day. In addition, we observed some local managers did not complete thorough sweeps of the unit.

Undeliverable Bulk Business Mail

When a piece of Marketing Mail is undeliverable, carriers place it in an Undeliverable Bulk Business Mail (UBBM) container for eventual recycling. Election and Political Mail placed into UBBM has special handling, verification, and documentation requirements to ensure it was correctly placed in UBBM and is recorded before being recycled.[25] During our first two weeks of observations, 23 of the 144 (16 percent) delivery units were non-compliant with UBBM procedures. Specifically, we found mail in UBBM that did not belong, including two ballots; improper handling of Election UBBM; and unrecorded Political UBBM.

The delivery units did not comply with UBBM policies and procedures due to a lack of management oversight and training. Management at some facilities did not know there was a separate process for Election UBBM mail. For example, management did not verify that Election and Political Mail in UBBM was properly placed in UBBM tubs and logged, as required.

During our weekly notification of the observation results, the Postal Service conducted additional training specific to Election and Political Mail that included the UBBM process. After the training, non-compliance with UBBM procedures decreased to 4.7 percent (37 of the 792 delivery units we visited). As a result, we will not be making a recommendation on this issue.

There is an increased risk of improper handling, untimely processing, and late delivery of Election and Political Mail when policies and procedures are not followed at processing facilities, delivery units, and regarding UBBM. This may also adversely affect the Postal Service's brand. In addition, failing to log in Election or Political Mail can put the Postal Service at risk if delivery concerns arise. See Table 3 for an overview of the Election and Political Mail we identified throughout our observations.

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22 *All Clear Certification for Delivery Units for Political Mail and Election Mail Standard Work Instructions*, February 16, 2024.
23 For a full overview of our sample, see Appendix C.
24 We can make this conclusion with 95 percent confidence.
25 Standard Work Instruction: *Handling Undeliverable Bulk Business Mail for Election Mail and Political Mail*, February 1, 2024.

Table 3. Delayed Mail Found in Postal Facilities During OIG Observations

Mail Type	Mail Location	Volume	Days Delayed
Ballot Mail	Processing Facilities	1,229	1-64
	Delivery Units	141	1-129
Non-Ballot Election Mail	Processing Facilities	972	1-21
	Delivery Units	245	1-63
Political Mail	Processing Facilities	6,648	1-6
	Delivery Units	11,900	1-20
Total		**21,135***	

Source: Results of OIG observations September 16 – November 6, 2024.
*Note: This total accounts for less than 0.01% of all Ballot Mail, Non-Ballot Election Mail, and Political Mail processed by the Postal Service from September 1 to November 15, 2024.

During the audit, the OIG presented weekly, facility-specific results for delivery units and processing facilities. We also reported trends in non-compliance to the Postal Service. In addition, the OIG visited some processing facilities — such as the Regional Processing and Distribution Centers — responsible for aggregating an entire region's mail twice, once at the beginning of the election season and then closer to election day. This enabled the Postal Service to take steps to correct deficiencies. The deficiencies we found did not materially impact the nationwide timely processing of Election and Political Mail nationwide.

Recommendation #3

We recommend the **Vice President, Processing Operations**, and the **Vice President, Delivery Operations**, finalize electronic Election and Political Mail reporting tools, written expectations for their use, and user guides in advance of the next federal election season.

Recommendation #4

We recommend the **Vice President, Delivery Operations**, use carrier data to prohibit managers from completing the delivery all clear certification before carriers leave and arrive back from their delivery duties.

Postal Service Response

Management agreed with the finding and the associated recommendations.

Regarding recommendation 3, management stated it would provide proper guidance on the use of all Election and Political Mail reporting tools in advance of the next federal election. Furthermore, the Postal Service stated it will socialize tools, provide additional training and guidance, and require certification in advance of the next federal election cycle. The target implementation date is April 30, 2026.

Regarding recommendation 4, management stated it will continue to ensure all clear certifications are not completed until all carriers have arrived back from their delivery duties. Furthermore, management will explore the possibility of utilizing available systems to validate carriers' departure from the office and returns prior to all clear certifications. The target implementation date is March 31, 2026.

OIG Evaluation

The OIG considers management's comments responsive to recommendations 3 and 4.

Finding #3: Extra Measures and Response During Election Period

Hurricane Preparedness and Response

Two major hurricanes swept the Southeastern part of the country in the weeks leading up to the 2024 general election. The Postal Service prepared for hurricanes Helene[26] and Milton[27] by sending out Industry Alerts with temporary closures and moving operations; suspending facility operations in impacted areas; and coordinating with local election officials before and after the storms to discuss volume, scheduled drop dates, and drop locations for ballots. In response to the hurricanes' impacts, the Postal Service deployed 17 mobile retail units (MRU) throughout the North Carolina District and the Southern Area and remained in close contact with the respective boards of election during the storms' aftermath.[28]

We conducted observations at eight judgmentally selected MRUs in hurricane-impacted areas. We identified issues at four of the units where we conducted observations. Specifically:

- Two MRUs were closed when observations were conducted. Local management at one unit stated it did not properly schedule clerks to be at the MRU that morning. The other unit's local management stated there were issues with faulty equipment in the MRU, but did not report this to district management.

- The other two MRUs were closed because operations had moved back into the original delivery unit. The postmasters at both delivery units were told by Hazmat officials that their buildings were safe to be occupied, but the units had not been cleared for occupancy by the Postal Service.

According to the Hurricane Preparedness Guide,[29] the Postal Service is required to identify and monitor any campaigns or elections that could be affected by a hurricane, set a strategy for handling Election and Political Mail, and confirm that next-level management provides a standard method for processing and tracking Election and Political Mail.

While headquarters management followed its hurricane guidance, the issues we identified occurred due to a lack of management oversight and communication. Local management should have properly scheduled clerks to work at the facility and should have communicated the faulty equipment issues to district management. Additionally, postmasters should have communicated with district management before moving back into their regular facility and closing their MRU.

On October 22, 2024, we notified the Postal Service of the issues we observed. As a result, the Postal Service took corrective action to ensure the two closed MRUs resumed operations October 23, and the two units that moved into their original delivery unit were relocated back into the MRU. District leadership provided onsite verifications at all four facilities to ensure the units were fully operational by October 24, 2024. As a result, we are not making a recommendation associated with this issue.

Extraordinary Measures and Local Transportation Optimization Key Activities

The Postal Service implemented extraordinary measures to accelerate delivery of ballots about two weeks before the general election day. For example, offices were allowed to use the Priority Mail Express network to expedite the delivery of completed ballots returned by voters the week of the election. The Extraordinary Measures Memorandum[30] was issued nationwide September 26, 2024, and they began October 21, 2024.

In addition, as part of the Delivering for America ten-year plan, the Postal Service developed the Local

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26   Hurricane Helene occurred from September 26 – 27, 2024. This hurricane affected various areas in Florida, Georgia, North Carolina, South Carolina, and Tennessee.
27   Hurricane Milton occurred from October 8 – 10, 2024. This hurricane affected multiple areas in Florida.
28   In addition to our oversight of MRUs, we also analyzed data around ballots that were accidentally returned to voters when the board of election was deemed temporarily undeliverable during a hurricane. This occurred because of a misunderstanding and was not a widespread issue in hurricane-impacted states.
29   *Hurricane Preparedness Guide*, updated May 2024.
30   2024 General Election Extraordinary Measures Memorandum, September 26, 2024.

Transportation Optimization (LTO) initiative,[31] which reduces the number of transportation trips to and from select delivery units from two to three trips per day to one trip per day. As of the election, LTO offices were in 18 regions across the country. LTO offices are select delivery units over 50 miles from a processing facility. During the general election, LTO units were provided a list of key activities, detailing how to postmark and expedite ballots being sent locally and nationwide.[32] The LTO Key Activities Memorandum[33] was issued nationwide September 26, 2024. The Postal Service provided requirements to LTO offices and centralized LTO hubs, which were to be established throughout LTO impacted areas.

We consistently found facility personnel did not have correct information about extraordinary measures. During observations the week of October 28, 2024, we found that multiple units were not following extraordinary measures in the Oregon, Idaho, Montana (OR-ID-MT) District and Pennsylvania 1 (PA-1) District. Local management in both districts reported that it was told by district management extraordinary measures should start the first week of November. Additionally, in the weeks leading up to the general election, management at 22 out of 43 (51 percent) mail processing facilities did not know when extraordinary measures started. During the extraordinary measures period, we visited 78 delivery hubs, which are responsible for the collection and delivery of ballots from nearby post offices. Unit personnel at 10 of these units did not know they were a hub or were not completing hub activities.

LTO offices in the OR-ID-MT District were operating normally instead of sending ballots to a hub, as required. In addition, we found that unit personnel[34] at 10 out of 31 (32.3 percent) delivery units that were designated as LTO sites did not know that they were LTO sites, and at 20 delivery units, personnel stated that their offices were LTO sites when they were not. We also found over 100 ballots in five mail processing

facilities that should have been sent from LTO offices to their assigned delivery hub, rather than the mail processing facility.

These conditions occurred due to a lack of communication and planning. While the memorandums detailing key activities and extraordinary measures were sent in September, the extraordinary measures and LTO key activities mandatory stand-up talks for staff were not provided to the field until October 23 and October 25, 2024, respectively, after these measures and key activities should have started.

Without adequate communication and planning, there is a risk that extraordinary measures and LTO Key Activities will not be followed, which could lead to delayed processing and delivery of ballots. After we notified the Postal Service of our observations, OR-ID-MT and PA-1 District management corrected their instructions and clarified that units should begin extraordinary measures.

Recommendation #5

We recommend the **Vice President, Delivery Operations**, and **Vice President, Retail and Post Office Operations**, work with **District Managers** to develop a plan to identify hub and spoke locations, including Regional Transportation Optimization sites, and communicate operational expectations in advance of the extraordinary measures period.

Postal Service Response

Management agreed with this finding and the associated recommendation.

Regarding recommendation 5, the Postal Service stated it would continue to provide communication, detailing expectations, to all identified hub and spoke and Regional Transportation Optimization locations, ahead of the extraordinary measures period. Management

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31   This initiative is evolving into Regional Transportation Optimization (RTO), and it will be rolled out nationwide.
32   This guidance was separate from and in addition to the Extraordinary Measures.
33   2024 Local Transportation Optimization (LTO) Key Activities Memorandum, September 26, 2024.
34   We spoke with the highest ranking official present at every unit.

added that training will be provided through stand-up talks and certification will be required. The target implementation date is March 31, 2026.

OIG Evaluation

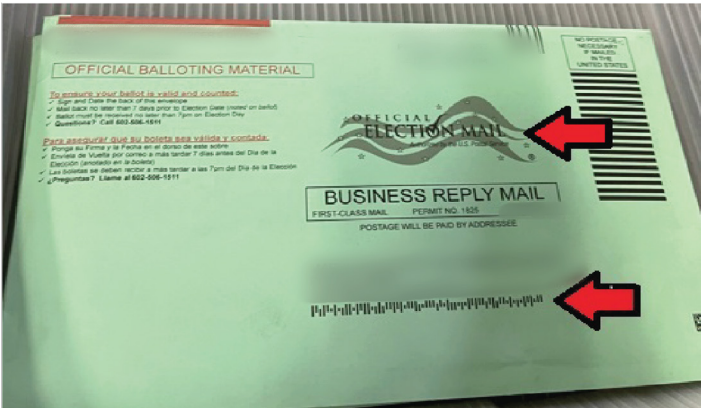The OIG considers management's comments responsive to recommendation 5.

Finding #4: Ballot Visibility in the Postal Service Network

In addition to the 59.4 million ballots tracked with service performance measurement discussed in Finding 1, the Postal Service estimates an additional 39.8 million ballots went through the network without tracking. Mailers are responsible for adding tracking barcodes and other tools to mailpieces, and the Postal Service has some methods to incentivize the use of these tools. Tracking data on each ballot mailpiece provides mailers and voters with additional visibility and helps the Postal Service identify and react to service or scanning issues. We found the Postal Service could increase pieces with visibility by further incentivizing the use of mail visibility tools, creating more controls for local turnaround ballots, and working with Ballot Mail service providers to track more pieces.

Ballot Mail Visibility Tools

Ballots sent to voters do not always include mail visibility tools that enable USPS service performance tracking. The Postal Service has several tools that provide visibility into Election Mail throughout the mailstream. The visibility tools available on mailpieces include the Intelligent Mail barcode (IMb) with a Service Type Identifier (STID) and Official Election Mail Logo, all shown in Figure 1. Election officials and the Postal Service also use Green Tag 191, shown in Figure 2, to identify Ballot Mail.

Figure 1. Example of Ballot Mail With Election Logo and IMb

Source: OIG photo taken November 4, 2024.

Figure 2. Example of Green Tag 191

Source: OIG photo taken November 4, 2024.

For a description of these tools and how they support visibility for Election Mail (see Table 4).

Table 4. Types of Visibility Tools Available for Election Mail

Type of Visibility Tool	Tool Description
Uniquely serialized IMb	An IMb is a 65-bar Postal Service barcode used to sort and track individual letters and flats.
STID	A STID is a unique three-digit code that is part of the IMb that indicates the service type for an individual mailpiece. The STID can set apart a mailpiece as a ballot.
Official Election Mail Logo	The Official Election Mail Logo is a unique registered trademark, exclusively for inclusion in the design of official Election Mail. Its use helps postal employees distinguish ballots quickly.
Green Tag 191	Green Tag 191 is a tag to identify trays and sacks that contain Ballot Mail. It also helps postal employees distinguish ballots quickly.

Source: USPS 2024 Official Election Mail Kit 600 and Publication 631, Official Election Mail – Graphic Guidelines and Logo.

The IMb and STID enable the Postal Service to measure service performance as well as identify potential delays in its network. For mailers, the IMb and STID provides visibility at the piece level for ballots as they flow through the network. Some mail service providers[35] use IMb data to provide boards of election and voters with the tracking data for

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35 Mail service providers help entities that send mailings prepare and present mail to the Postal Service.

individual ballots, showing them when a ballot was mailed and the receipt of the subsequent return ballot. In addition, some states use IMb data as evidence that the Postal Service had a ballot in its possession before election day. This is important, as past reporting found that facilities have not always postmarked ballots, as required.[36] In exchange for putting IMbs on mailpieces, the Postal Service offers mailers lower rates.

The Postal Service was unable to provide visibility or track the service on mailpieces that do not use an IMb within the postal network, and the STID is the only way the Postal Service can distinguish Ballot Mail from other mail for service performance tracking. The Postal Service works closely with election officials at all levels of government to provide recommendations on mailpiece design, mailing preparation and entry, and delivery timing. It strongly encourages election officials to use the visibility tools to increase visibility of Election Mail throughout the mailstream, but there are no requirements for these tools to be used (see Figure 3 for an example of Ballot Mail with no IMb, found at a mail processing facility).

Figure 3. Example of Ballot Mail Without an IMb
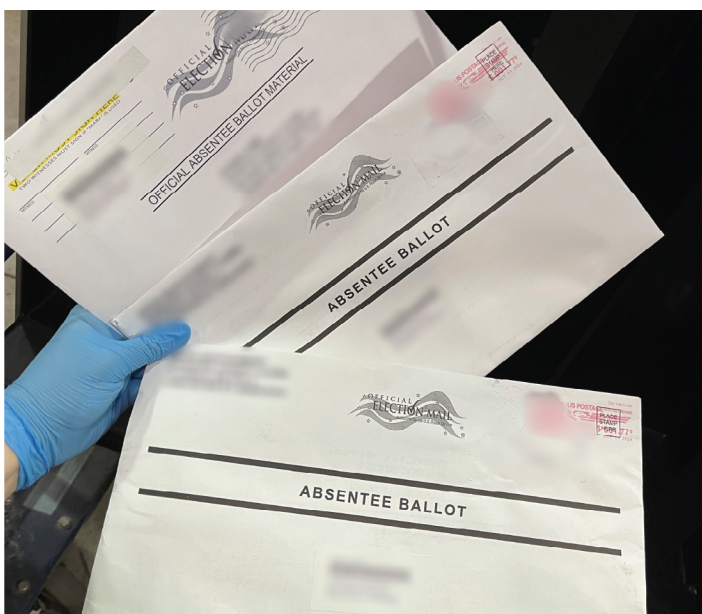
Source: OIG photo taken October 17, 2024.

An additional discount for the use of IMb plus a ballot STID could incentivize more ballot mailers to use visibility tools. There is a risk that the Postal Service would not be able to identify and address issues that might occur with Election Mail whose senders do not use visibility tools, which can harm the reputation of the Postal Service. In addition, boards of election cannot provide mail visibility information from the Postal Service to voters without using the IMb.

Local Turnaround Ballots

In this election cycle, like previous federal election cycles, post offices servicing a board of election were required to retrieve Ballot Mail destined for that board of election office from collection mail, postmark it at the post office, and arrange hand-off with the board of election. Some post offices were also required to bypass processing operations and send ballots directly to a nearby hub post office that delivered mail to a board of election. Both instances are referred to as "local turnaround." This year, the use of local turnaround started October 21, 16 days before the election. This was earlier than the 2020 general election, when local turnaround started nine days before the election. Local turnaround ballots do not receive any scans, even if they have IMb barcodes. The Postal Service sent out surveys to delivery unit management to identify the number of ballots that went through local turnaround. The survey results showed 2.5 million previously unmeasured mailed ballot envelopes, including from states and territories that might employ the use of an IMb. In the future, enabling scanning for local turnaround ballot envelopes would provide complete data, and it would also give visibility to boards of election and voters as ballots go through the Postal Service's network.

Exclusions From Measurement

In addition to Election Mail without an IMb or handled via local turnaround, another type of mail that is not included in service calculations are mailpieces excluded from measurement. Mail that does not meet mail preparation requirements or comply with certain business rules, such as missing key scan data, is excluded from service performance

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36 See *Election Mail Readiness for the 2024 General Election*, USPS OIG, Report #24-016-R24, dated July 30, 2024, https://www.uspsoig.gov/reports/audit-reports/election-mail-readiness-2024-general-election.

measurement. Nearly a quarter of all mail-in ballots sent to voters with IMbs were not counted toward service performance during this election cycle. We did not report on the 13.2 million[37] ballots that were removed from service performance measurement for purposes of calculating the on-time scores shown in Table 1.

There are numerous reasons why mail would be excluded from measurement. For example, during the period of September 1 through November 15, 2024, the Postal Service processed about 204,000 ballots going from boards of election to voters and about 5,800 ballots going to the boards of election from voters in the PARS operation. PARS mail is excluded from service performance measurement. PARS mail goes through a system that relabels it, and then it must re-start its processing journey with the new label, without a service standard. We saw Ballot Mail in PARS in seven of 68 mail processing facilities we visited.[38]

Another reason for exclusion from measurement stems from mail and preparation issues by ballot mailers. Of the 13 million ballots sent to voters excluded from measurement, over 9 million ballots (82 percent) came from one of five mailers (see Table 5). Out of the five mailers, Ballot Mailer One[39] had 4.3 million ballots that were excluded from measurement.

Table 5. Top Five Mailers With Ballots Sent to Voters Excluded From Measurement

Mailer Number	Ballots Sent to Voters Excluded From Measurement
1	4,284,070
2	1,937,532
3	1,472,285
4	869,759
5	704,327
Total	9,267,973

Source: OIG analysis of Postal Service data from Informed Visibility.

We sought to better understand why the mail did not have tracking information and how the Postal Service was holding the mailer accountable. We conducted observations on October 16, 2024, at six processing facilities that had received drop shipments of ballots from Ballot Mailer One. The Postal Service had not scanned the dropped ballots as of October 15, 2024. According to local management at one of the processing facilities, the mailer entered pallets of ballots at the incorrect facility, and as a result, an extra trip was used to move those pallets to the correct processing facility. Analyzing shipping data for Ballot Mailer One, we found it misshipped 190 containers of mail[40] in September and October 2024. The Postal Service did not collect fees from Ballot Mailer One for these misshipped containers because the Postal Service's threshold for mailer errors is 5 percent of a mailers' total volume, and the total assessment of additional postage due, if under $500, is not collected.

The Postal Service knew about the Ballot Mailer One exclusions throughout the election cycle, and management reported staff turnover at Ballot Mailer One led to the issues that caused the exclusions. Mail service providers preparing Ballot Mail for the Postal Service would benefit from specific training, provided by the Postal Service, tailored to reduce common service performance exclusions. Providing a file with this information could help mailers who have new staff working on Ballot Mail preparation.

A ballot mailer can be responsible for printing and preparing millions of ballots across multiple states. When ballot mailers enter ballots at the wrong facility, the Postal Service faces additional costs to transport the unanticipated volume, and it slows down delivery of Ballot Mail to recipients. However, for mailers with high volume, like Ballot Mailer One in the example above, they face no penalties. Additionally, when ballots are excluded from service performance measurement, especially at high levels like the

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37 From September 1 to November 15, 2024, about 13.05 million ballots sent to voters and about 140,000 ballots sent back from voters were excluded from service performance measurement.

38 We are not making a recommendation related to PARS because this was addressed in a nationwide audit of PARS. See *Postal Automated Redirection System*, USPS OIG, Report #25-029-R25, April 10, 2025.

39 Mailer's name changed to maintain anonymity.

40 2.3 million ballots from this mailer were excluded from measurement for an invalid entry facility.

mailers in Table 5, the Postal Service does not have accurate service performance scores across the network.

Recommendation #6

We recommend the **Chief Customer and Marketing Officer and Executive Vice President** consider additional incentives for using serialized Intelligent Mail barcodes and service type identifiers for mail service providers that mail ballots.

Recommendation #7

We recommend the **Vice President of Delivery Operations** create a method for scanning local turnaround ballots at delivery units.

Recommendation #8

We recommend the **Executive Director, Product Solutions**, in conjunction with the **Director, Election and Government Mail Services,** implement specific training for Ballot Mail service providers tailored to reducing common service performance exclusions.

Recommendation #9

We recommend the **Executive Director, Product Solutions**, set specific exclusion thresholds for Ballot Mail.

Postal Service Response

Management disagreed with the finding, agreed with recommendations 6 and 8, and disagreed with recommendations 7 and 9.

Regarding the finding, management disagreed with the suggestion that offering election officials an additional price discount for use of Full Service IMb and ballot STID will protect the reputation of the Postal Service by incentivizing the use of recommended visibility tools. Management also disagreed with the impact of service performance measurement exclusions on Ballot Mail visibility, stating that tracking information is still available for mailpieces that are excluded from measurement.

Regarding recommendation 6, management stated it will continue to evaluate options to provide additional incentives for mail service providers that mail ballots to utilize serialized IMb and ballot STIDs. The target implementation date is August 30, 2025.

Regarding recommendation 7, management stated it does not have the equipment or capability to capture IMb scans at delivery facilities. Additionally, management stated the time associated with capturing scans on the millions of pieces of locally turned around Ballot Mail could result in untimely delivery of this volume to the designated boards of elections, and the cost of workhours to complete scanning is not built into the cost of First-Class or Marketing Mail postage.

Regarding recommendation 8, management stated it will include training material tailored to limiting Service Performance Measurement exclusions to its current Election Mail Service Provider training curriculum. The target implementation date is August 30, 2025.

Regarding recommendation 9, management stated there is an existing process that it will continue to follow, and Ballot Mail will continue to be included in that process.

OIG Evaluation

The OIG considers management's comments responsive to recommendations 6 and 8. The OIG does not consider management's comments responsive to recommendations 7 and 9, viewing those disagreements as unresolved. We will pursue them through the audit resolution process.

Regarding management's disagreement with the finding, we maintain that an additional discount for the use of IMb plus a ballot STID could incentivize more ballot mailers to use visibility tools. The IMb and STID enable the Postal Service to measure service performance as well as identify potential delays in its network. For mailers,

the IMb and STID provides visibility at the piece level for ballots as they flow through the network.

A risk exists that the Postal Service would not be able to identify and address issues that might occur with Election Mail whose senders do not use visibility tools. In addition, boards of election cannot provide mail visibility information from the Postal Service to voters without using the IMb. The Postal Service was unable to provide visibility or track the service on mailpieces that do not use an IMb within its network, and the STID is the only way the Postal Service can distinguish Ballot Mail from other mail for service performance tracking.

Regarding recommendation 7, the Postal Service already has the capability to scan mailpieces at delivery facilities; clerk and carrier scanners currently perform scans of flats' and letters' IMbs during the Postal Service's sampling process. Regarding the time it would take to scan, during the 2024 general election cycle the Postal Service sent out surveys to delivery unit management to identify the number of ballots that went through local turnaround during the extraordinary measures period. Local management was asked to manually count and record all local turnaround ballots. We believe the time associated with manually counting and recording this volume would equal, if not exceed, the potential time it would take to scan the pieces. Regarding the cost of scanning, in a past report[41] we recommended the Postal Service develop a plan to analyze costs associated with the processing and delivery of Election Mail. This recommendation is currently in resolution – if it were implemented, it could help the Postal Service more accurately assess the cost of counting local turnaround volume through various methods.

Regarding recommendation 9, we maintain that when ballots are excluded from service performance measurement, especially at high levels by individual mailers, the Postal Service can incentivize better preparation by setting exclusion thresholds specific to Ballot Mail. Individual, large mailers were responsible for most preparation issues in this election, but they are not held accountable under the current system because Ballot Mail accounts for a small percentage of their total mail volume in a given month.

Looking Forward

The Postal Service plays a critical role as a steward of ballots, election information, and campaign materials in election cycles. While the Postal Service generally processed Election and Political Mail timely and in line with policy, it can provide clear communications, both internally and externally, to improve compliance and provide more transparency in future elections. This will be increasingly important as the Postal Service continues to adjust operations in regions of the country opening new regional processing facilities that handle large volume that will often cross state lines. In addition, the Postal Service's evolution of LTO into its RTO initiative, creates the need for a strong hub and spoke network for delivery units so ballots move efficiently through the network in the days leading up to elections. Even as the Postal Service changes mail flows and operations, its role in processing, transporting, delivering, and providing tracking information for the nation's Election and Political Mail in future elections will remain.

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41   See recommendation 1 in Service Performance of Election Mail For the 2022 Mid-Term Elections.

Appendices

Appendix A: Additional Information

Scope and Methodology

The scope of our audit was the Postal Services' service performance of Election and Political Mail during the 2024 General Election and the visibility of Election and Political Mail. To accomplish our objective, we:

- Reviewed the Postal Service's Election and Political Mail processing and delivery policies, procedures, and related documents.

- Judgmentally selected and conducted 75 unannounced observations at 68 mail processing facilities and 947 unannounced observations at delivery units from September 16 through November 6, 2024. We selected facilities in every state and the District of Columbia. Observations included Delivering For America-impacted facilities. We included 10 Regional Processing and Distribution Centers, two LPCs, 28 Sorting and Delivery Centers, and 31 LTO facilities.

- Conducted observations at mail processing facilities to determine if they:

  - Performed daily all clears to validate that committed Election and Political Mail had been processed and was not delayed.

  - Completed the daily Election and Political Mail Audit Checklist.

  - Properly completed the electronic Election and Political Mail Log.

- Conducted observations at delivery units to determine if they:

  - Performed AM and PM daily all clears to validate committed Election and Political Mail had been delivered and was not delayed.

  - Properly completed the Election and Political Mail Log.

  - Appropriately handled UBBM Mail.

- Conducted a review of all clear certifications at 203 delivery units nationwide to determine if the

facilities were certifying they were all clear prior to carriers departing the unit for their delivery route or before all carriers completed their deliveries and returned to the unit.

- Conducted observations post-election from November 6 to November 8, 2024, at 154 delivery units to assess Ballot Mail volume remaining in the Postal Service network.

- Communicated with Postal Service Headquarters officials to identify key practices and extraordinary measures implemented for the general election.

- Identified visibility tools that were available to election officials and the Postal Service to determine how they support visibility of Election Mail in the mailstream.

- Analyzed Postal Service data on Election and Political Mail service performance, including volume excluded, from September 1 to November 15, 2024.

We conducted this performance audit from July 2024 through April 2025 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 objectives. We discussed our observations and conclusions with management on March 21, 2025, and included its comments where appropriate.

In planning and conducting the audit, we obtained an understanding of Election and Government Mail Services, Processing, and Retail Delivery Operations' internal control structure to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the program and mitigating associated

risks. Additionally, we assessed the internal control components and underlying principles, and we determined that control environment, control activities, and information and communication components were significant to our audit objective.

We developed audit work to ensure that we assessed these controls. Based on the work performed, we identified internal control deficiencies related to control activities and information and communication that were significant within the context of our objectives. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of Election Mail and Political Mail volume and on-time scores data in Informed Visibility by reviewing existing information, comparing summarized data to the underlying source data, and validating the underlying data with Postal Service officials knowledgeable about the data. We also assessed the reliability of Volume Arrival Profile data by reviewing existing information and comparing data from other sources. 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
Election Mail Readiness for the 2024 General Election	To evaluate the U.S. Postal Service's readiness for timely processing and delivery of Election and Political Mail for the 2024 general election.	24-016-R24	July 30, 2024	None
Service Performance of Election Mail for the 2022 Mid-Term Elections	To evaluate the Postal Service's service performance of Election during the November 2022 mid-term elections.	22-187-R23	March 27, 2023	$23,033,770
Election Mail Readiness 2022 Mid-term Election	To evaluate the Postal Services readiness for timely processing of Election Mail for the 2022 mid-term election to be held Tuesday November 8, 2022.	22-093-R22	September 26, 2022	None
International Election Mail Observations for the 2020 General and 2021 Georgia Senate Runoff Elections	To evaluate the Postal Service's international mail operations during the 2020 general election and the state of Georgia Senate runoff elections.	21-007-R21	April 29, 2021	None
Service Performance of Election and Political Mail During the November 2020 General Election	To evaluate the U.S. Postal Service's service performance of Election and Political Mail during the November 2020 general election. We also evaluated the handling of mail for the Georgia Senate runoff election held on January 5, 2021.	20-318-R21	March 5, 2021	None
Processing Readiness of Election and Political Mail During the 2020 General Elections	To evaluate the U.S. Postal Service's readiness for timely processing of Election and Political Mail for the 2020 general election.	20-225-R20	August 31, 2020	None
Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area	To determine the cause of delayed Ballot Mail in the Milwaukee, WI P&DC service area for the spring election and presidential preference primary of April 7, 2020.	20-235-R20	July 7, 2020	None
Service Performance of Election and Political Mail During the 2018 Midterms and Special Elections	To evaluate the Postal Service's performance in processing Election and Political Mail for the 2018 midterm and special elections.	19XG010NO000-R20	November 4, 2019	None
Processing Readiness for Election and Political Mail for the 2018 Midterm Elections	To evaluate the Postal Service's readiness for timely processing of Election and Political Mail for the 2018 Midterm Elections.	NO-AR-18-007	June 5, 2018	None

Appendix B: Post-Election Ballot Sweeps

After election day, we conducted observations at 154 delivery units across 39 states between November 6 and November 8, 2024, to assess Ballot Mail remaining in the postal network. We identified a total of 2,058 ballots in 17 of the 154 units.[42]

Forty-seven of these ballots were bound for states that had an election day deadline, and four of the ballots were missing postmarks, making them ineligible to be counted in states whose deadlines were after election day (see Table 6).

Table 6: Post Election Delivery Unit Sweep Results

Will Postmarked[43] Ballots Be Counted After Election Day?	# of Ballots Identified	# of Ballots Postmarked	# of Ballots That Would Not Be Counted	# of Units Visited
Yes	2,011	2,007	4	76
No	47	-	47	78
Total	**2,058**	**2,007**	**51**	**154**

Source: OIG Observations conducted between November 6 and November 8, 2024, and an analysis of state ballot laws.

Without compliance, implementation, and clear communication of the Election and Political Mail policies and procedures, there is a risk of improper handling, untimely processing, and late delivery of Election and Political Mail. This can increase the risk of negative publicity regarding the Postal Service's practices and conduct that may adversely affect the Postal Service brand and reputation. In addition, failing to log in Election or Political Mail can put the Postal Service at risk if delivery concerns or legal issues arise.

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42 One post office servicing a board of election accounted for 95.6 percent of the ballots identified. This was in a state where if ballots had a postmark, they would be counted, and all the ballots had a postmark. The pieces found at this post office had all arrived from a single processing facility. The OIG immediately notified the Postal Service.

43 Eighteen states and the District of Columbia accept ballots after election day if they are postmarked by election day.

Appendix C: All Clear Certifications

We conducted a review of all clear certifications on October 16, 2024, at 203 delivery units[44] nationwide to determine if the facilities were certifying they were all clear after carriers departed the unit for their delivery route by 2 p.m., or after all carriers completed their deliveries and returned to the unit. We found management at 144 out of 203 (70.9 percent) delivery units had improperly completed their certifications. Specifically, 98 units (48.3 percent) had an AM all clear certification failure, and 102 units (50.2 percent) had a PM all clear certification failure (see Table 7).[45]

Table 7. Nationwide All Clear Certification Failures by Area on October 16, 2024

Area	Sample Number	AM Certification Failures	AM Failure Rate	PM Certification Failures	PM Failure Rate	Total Failures	Total Failure Rate
Atlantic	60	33	55.0%	29	48.3%	46	76.7%
Central	52	17	32.7%	27	51.9%	33	63.5%
Southern	50	27	54.0%	32	64.0%	39	78.0%
WestPac	41	21	51.2%	14	34.1%	26	63.4%
Total	**203**	**98**	**48.3%**	**102**	**50.2%**	**144**	**70.9%**

Source: Volume Arrival Profile and Rural Management Support System.

Based on the methodology of our stratified attribute sampling, we concluded that at least 69.3 percent of the 8,083 delivery units with six or more routes had either an AM or PM certification failure.[46]

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44 We selected a stratified attribute sample of 203 delivery units with six or more routes across the country.
45 Units with both an AM and a PM failure were counted as only one failure.
46 We can make this conclusion with 95 percent confidence.

Appendix D: Management's Comments

UNITED STATES POSTAL SERVICE

April 9, 2025

BRIAN NEWMAN
ACTING DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Service Performance of Election and Political Mail
During the 2024 General Election (24-143)

Thank you for providing the Postal Service an opportunity to review and comment on the findings and recommendations contained in the draft audit report, *Service Performance of Election and Political Mail During the 2024 General Election.*

The Postal Service generally agrees with the findings of the audit, which concludes that the Postal Service successfully prioritized the timely processing and delivery of Election Mail and Political Mail during the 2024 General Election. Our success was due to the extensive operational and organizational preparation leading up to the General Election, our ongoing utilization of procedures to expedite the processing and delivery of Ballot Mail entered close to or on Election Day (as we have done in prior federal election cycles), and our strong working relationships with election officials. These established processes have produced strong results. On average, during the 2024 General Election, we delivered ballots to and from voters in less than two days.

That said, we have identified some areas in the draft report where the OIG could more accurately describe the Postal Service's work to support our Election Mail and Political Mail customers.

Finding #1: Election and Political Mail Service Performance During the 2024 General Election

The Postal Service agrees with the initial aspect of this finding in that that we successfully processed Election and Political Mail on time and that overall performance for Ballot Mail was strong during the 2024 General Election Cycle.

However, we note that the OIG's observation that the Postal Service should require the use of First-Class Mail for outbound Ballot Mail is focused on the additional revenue the Postal Service could gain but fails to consider or reflect the broader environment and the political realities. For example, forcing Boards of Election to use First-Class Mail, rather than Marketing Mail, will almost certainly provoke extensive concerns from election officials and other stakeholders who are cost constrained, including the potential for litigation over whether we must allow outbound ballots to be sent as non-profit Marketing Mail.

It is also not necessarily the case that mailers lack an incentive to pay for First-Class Mail service if the less expensive Marketing Mail product will arrive in roughly the same amount of time. While it is true that the difference in service standards is a clear

distinction between the two products that is to some degree minimized by our treatment of Ballot Mail that is sent via Marketing Mail, First-Class Mail service includes other features and benefits that can incentivize the use of the service. For example, First-Class Mail postage includes forwarding and return services enabling customers to plan for and predict total mailing cost and avoid fees associated with undeliverable as addressed and returned Marketing Mail pieces. The Postal Service has always recommended that outbound ballots be sent as First-Class Mail and will continue to do so.

<u>Finding #2: Non-Compliance With Election and Political Mail Policies and Procedures</u>

The Postal Service acknowledges that there were instances of our employees failing to follow our Election Mail Policy and Procedures as there could be when considering the scope, size, and scale of our Election Mail efforts, and therefore we agree with this aspect of this finding. That said, there are aspects of the findings that do not accurately reflect our policies depending on the facts and circumstances. For example, regarding the all-clear process, finding Election Mail and/or Political Mail in the facility after management completed an all-clear certification does not necessarily mean that the certification was incorrect. Election Mail and Political Mail identified in the plant may not be committed for delivery that day (which is what the certification represents).

The Postal Service would like to emphasize that we appreciate the OIG's ongoing communication of observed deficiencies throughout the audit period and the acknowledgment that the deficiencies found did not materially impact the nationwide timely processing of Election Mail and Political Mail.

<u>Finding #3: Extra Measures and Response During Election Period</u>

Regarding the Hurricane Preparedness and Response section of the finding, the Postal Service is proud that, due to our hurricane recovery efforts and the deployment of extraordinary measures in the weeks before Election Day, voters in the areas affected by hurricanes Helene and Milton who chose to use the mail to vote received performance comparable to the service we provided to the rest of the nation. Experience and preparation, combined with the Postal Service's robust processing and delivery network and our experience in dealing with natural disasters over the course of our history, minimized the impact of the hurricanes on the processing, transport, and delivery of mail, including Election Mail, in affected locations.

As to the Extraordinary Measures and LTO Key Activities section of the finding and as previously stated, management acknowledges that there were instances of our employees failing to follow our Election Mail Policy and Procedures. While we can agree with this portion of the finding, there are attributes that are potentially misleading. For example, the Postal Service has concerns with the assertion that the conditions detailed in the finding occurred due to a lack of communication and planning. This conclusion is based on memorandums detailing LTO key activities and Extraordinary Measures being sent in September and the mandatory stand-up talks not being provided until later in October. Lacking further context, this gap can appear concerning at first blush;

however, the memorandums themselves are a communication to all employees and include the instructions that, upon receipt, management is to fully explain to all direct reports the measures contained within. Further mandatory training sessions on both extraordinary measures and LTO key activities were also conducted from October 3rd through October 25th. Ultimately, performance was strong, and it is important to note that, as a general matter, our employees are following our processes and procedures.

Finding #4: Ballot Visibility in the Postal Service Network

The Postal Service disagrees with multiple aspects of the finding. We disagree with the suggestion that offering election officials an additional price discount for use of Full Service IMb and ballot STID will protect the reputation of the Postal Service by incentivizing use of our recommended visibility tools. Current discounts exist for all mailers who prepare their mailings as Full-Service mailings. We remind the OIG that it is the mailer's option to utilize the visibility tools currently available to "increase transparency for the Postal Service, voters, and boards of election." We strongly recommend that mailers use these tools, but it is ultimately up to the mailer whether to accept our recommendation.

The Postal Service also has concerns with the report to the extent it is misleading about the impact of Service Performance Measurement exclusions on Ballot Mail visibility that is erroneously detailed in the exclusions from measurement section. While we agree to implement the related recommendation, we believe it is critical to clarify that tracking information is still available for mail pieces that are excluded from measurement.

Monetary Impact

Finally, Management notes that the monetary impact analysis performed by the OIG is focused on the amount of estimated lost revenue experienced by the Postal Service by providing First-Class Mail delivery speeds to Ballot Mail pieces that paid Marketing Mail prices. This approach assumes that the number of outbound ballots mailed to voters would remain constant in the face of significantly higher prices, but in fact it is unknown how such a price increase would impact election officials' decisions on how to use the mail. Furthermore, as previously mentioned, although increasing the price of outbound ballots may generate additional revenue, this approach overlooks the near certainty of significant concerns from election officials and other stakeholders who are cost constrained and the potential for lawsuits regarding whether we are required to accept outbound ballots at Marketing Mail rates.

Recommendation 1:

OIG recommends the Chief Customer and Marketing Officer and Executive Vice President charge First-Class Mail rates for Ballot Mail because service is comparable to or exceeds First-Class Mail service.

Management Response/Action Plan:

Management disagrees with this recommendation. As an initial matter, and as explained elsewhere, while it may be true that the Postal Service delivers Ballot Mail entered as Marketing Mail within timeframes comparable to First-Class Mail, the delivery speed (or service standard in terms of days to deliver) is not the only distinction between the two products: First-Class Mail service includes other features and benefits that incentivize the use of the service. For example, First-Class Mail postage includes forwarding and return services enabling customers to plan for and predict total mailing cost and avoid fees associated with undeliverable as addressed and returned Marketing Mail pieces. The rate difference between the two products addressed more than just delivery speeds, which the OIG recommendation does not address. In other words, while the OIG may be correct that the Postal Service revenue may increase if we charge First-Class Mail rates for Ballot Mail, it does not acknowledge that Ballot Mail entered as Marketing Mail does not receive the other features of First-Class Mail. This recommendation also fails to recognize that implementation is much more complicated than simply changing the rate. For example, a decision to charge more for Ballot Mail entered as Marking Mail by the Postal Service would almost certainly provoke extensive concerns from election officials and other stakeholders who are cost constrained, including the potential for litigation over whether we must allow outbound ballots to be sent as non-profit Marketing Mail. Moreover, the OIG does not acknowledge the limitations in the Postal Service's ability to implement the recommendation. As drafted, the recommendation could mean that the OIG recommends that the Postal Service should somehow collect the difference in rates for Ballot Mail that is entered as Marketing Mail but receives First-Class Mail delivery speeds. However, the Postal Service does not have the authority to retroactively charge and collect higher rates in that manner. Alternatively, the OIG recommendation could be that the Postal Service should not allow Ballot Mail to be entered as Marketing Mail. However, unless Ballot Mail entered as Marketing Mail (rather than First-Class Mail) were treated as nonmailable, the Postal Service would still need to accept and process that mail. It would not stop mailers from choosing to enter Ballot Mail as Marketing Mail but would then put the Postal Service in the untenable position of treating some Ballot Mail differently than other Ballot Mail. Furthermore, implementation of this recommendation could be interpreted to require the Postal Service to amend current mailing standards in such a way as to disallow mailed content that by current mailing standards meets all requirements for Marketing Mail but for the mail contains ballots, and to do so to only a specific group of customers, which raises concerns from both a customer service and legal perspective. It could also be interpreted in a manner that would require the Postal Service to further differentiate between Ballot Mail for use in specific types of elections (as many of the Postal Service's Election Mail practices apply to only nationwide federal elections, for example).

Target Implementation Date:

Not Applicable

Responsible Official:

Not Applicable

Recommendation 2:

OIG recommends the Executive Director, Product Solutions assess options to charge for the premium service provided for late arriving Political Mail or clarify policy around delivery expectations for this mail.

Management Response/Action Plan:

Management agrees with this recommendation insofar as we agree to remove any ambiguous language in our documentation and ensure that we clarify our policy around delivery expectations for Political Mail that is deemed late arriving.

Target Implementation Date:

August 30, 2025

Responsible Official:

Executive Director, Product Solutions & Director, Election and Government Mail Services

Recommendation 3:

OIG recommends the Vice President, Processing Operations, and the Vice President, Delivery Operations, finalize electronic Election and Political Mail reporting tools, written expectations for their use, and user guides in advance of the next federal election season.

Management Response/Action Plan:

Management agrees with this recommendation and will ensure that proper guidance is provided on the use of all Election and Political Mail reporting tools in advance of the next federal election. CRDO will socialize tools and provide additional training and guidance and require certification in advance of the next federal election cycle.

Target Implementation Date:

April 30, 2026

Responsible Official:

CPDO – Sr. Director, Strategic Planning and Implementation
CRDO – Vice President, Delivery Operations

Recommendation 4:

OIG recommends that the Vice President, Delivery Operations, use carrier data to prohibit managers from completing the delivery all clear certification before carriers leave and arrive back from their delivery duties.

Management Response/Action Plan:

Management agrees with this recommendation and will continue to ensure that all-clear certifications are not completed until all carriers have arrived back from their delivery duties. Management will explore the possibility of utilizing available systems (TACS & DMS) to validate carriers' departure from the office and returns prior to all-clear certifications.

Target Implementation Date:

March 31, 2026

Responsible Official:

Vice President, Delivery Operations

Recommendation 5:

OIG recommends the Vice President, Delivery Operations, and Vice President, Retail and Post Office Operations, work with District Managers to develop a plan to identify hub and spoke locations, including Regional Transportation Optimization sites, and communicate operational expectations in advance of the extraordinary measures period.

Management Response/Action Plan:

Management agrees with this recommendation and will continue to provide communication, detailing expectations, to all identified Hub and Spoke locations, ahead of the extraordinary measures period.
Training will be provided through stand-up talks and requiring certification.

Target Implementation Date:

March 31, 2026

Responsible Official:

Vice President, Delivery Operations

Recommendation 6:

OIG recommends the Chief Customer and Marketing Officer and Executive Vice President consider additional incentives for using serialized Intelligent Mail barcodes and service type identifiers for mail service providers that mail ballots.

Management Response/Action Plan:

Management agrees with this recommendation and will continue to evaluate options to provide additional incentives for mail service providers that mail ballots to utilize serialized Intelligent Mail barcodes and Ballot Service Type Identifiers.

Target Implementation Date:

August 30, 2025

Responsible Official:

Chief Customer and Marketing Officer and Executive Vice President

Recommendation 7:

OIG recommends the Vice President of Delivery Operations create a method for scanning local turnaround ballots at delivery units.

Management Response/Action Plan:

Management disagrees with this recommendation. We do not currently have the equipment or capability to capture IMb scans at our delivery facilities. The time associated with capturing scans on the millions of pieces of locally turned around Ballot Mail could result in untimely delivery of this volume to the designated Boards of Elections.

Additionally, the associated cost of workhours required is not built into our costing model for First-Class or Marketing Mail postage.

Target Implementation Date:

Not Applicable

Responsible Official:

Not Applicable

Recommendation 8:

OIG recommends the Executive Director, Product Solutions, in conjunction with the Director, Election and Government Mail Services, implement specific training for ballot mail service providers tailored to reducing common service performance exclusions.

Management Response/Action Plan:

Management agrees with this recommendation and will include training material tailored to limiting Service Performance Measurement (SPM) exclusions to our current Election Mail Service Provider training curriculum.

Target Implementation Date:

August 30, 2025

Responsible Official:

Director, Election and Government Mail Services

Recommendation 9:

OIG recommends the Executive Director, Product Solutions, set specific exclusion thresholds for Ballot Mail.

Management Response/Action Plan:

Management disagrees with this recommendation. There is an existing process that we will continue to follow, and Ballot Mail will continue to be included in that process.

Target Implementation Date:

Not Applicable

Responsible Official:

Not Applicable

E-SIGNED by ISAAC.S CRONKHITE
on 2025-04-10 09:41:08 EDT

Isaac S. Cronkhite
Chief Logistics and Processing Operations Officer & Executive Vice President

E-SIGNED by ELVIN MERCADO
on 2025-04-09 18:10:22 EDT

Elvin Mercado
Chief Retail and Delivery Officer & Executive Vice President

E-SIGNED by JOSHUA.D COLIN
on 2025-04-09 20:27:01 EDT

Dr. Joshua D. Colin, PhD.
Chief Performance Officer & Executive Vice President

E-SIGNED by Steven.W Monteith
on 2025-04-09 18:27:35 EDT

Steven W. Monteith
Chief Customer & Marketing Officer & Executive Vice President

cc: *Manager, Corporate Audit Response Management*

Contact us via our Hotline and FOIA forms. Follow us on social networks. Stay informed.

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