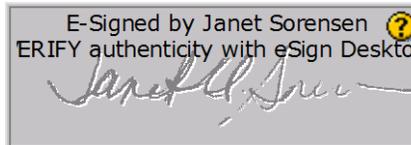




March 17, 2015

MEMORANDUM FOR: JEFFREY C. WILLIAMSON
CHIEF HUMAN RESOURCES OFFICER AND EXECUTIVE
VICE PRESIDENT

JAMES COCHRANE
CHIEF INFORMATION OFFICER AND EXECUTIVE VICE
PRESIDENT



FROM: Janet M. Sorensen
Deputy Assistant Inspector General
for Revenue and Resources

SUBJECT: Management Alert – 911 Emergency Services Policy
(Report Number HR-MA-15-003)

This management alert presents concerns regarding the U.S. Postal Service's 911 Emergency Services Policy (Project Number 15RG012HR000). This issue came to our attention during our review of a November 2014 news agency investigative report on an incident that occurred at a Postal Service facility in the Bay-Valley District of California.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Monique P. Colter, director, Human Resources and Support, or me at 703-248-2100.

cc: Corporate Audit and Response Management

Attachment

Introduction

This management alert presents concerns with regard to the U.S. Postal Service's 911 Emergency Services Policy (Project Number 15RG012HR000). The nation's 911 system, which has become the backbone of emergency reporting and response, was designed to provide a universal, easy-to-remember number for people to use to reach police, fire, or emergency medical assistance. People can dial the number from any telephone in any location, without having to look up a specific phone number, and the system routes calls to the nearest public safety agency communications center, thereby facilitating a quick and accurate response to emergencies.

The Postal Service also established the Occupational Health Service (OHS) program to address the health and safety of all Postal Service employees. The program consists of administrative activities and wellness initiatives. The Postal Service has about 31,600 facilities but only 21 facilities have postal police, only 56 facilities have security personnel and only 67 facilities have OHS personnel (see Table 1.)

Table 1. Summary of Facilities With Emergency Services Support

Emergency Services Support	Total Facilities
Postal Police	21
Security Personnel	56
OHS Personnel	67

Source: U.S. Postal Inspection Service and the Payroll Application System.

While on duty on August 8, 2014, a Postal Service employee sustained a head injury at a Bay-Valley District Postal Service facility in California.¹ Two employees notified their supervisors of the incident and one supervisor called the postal police once other managers arrived at the scene. It took about 12 minutes from the time the injured employee was found until the supervisor notified the postal police and 11 additional minutes for the postal police to initiate the call to 911 emergency services. The employee later died from his injuries.

According to the Postal Service's national emergency services policy, when a medical emergency occurs the recommended procedure is to notify Postal Service security or another designee, who will then call 911. The Bay-Valley District facility policy required a supervisor or an employee (if the supervisor is not in the immediate area) to call the postal police.

¹ Based on a Postal Service Serious Accident Review Board report dated August 29, 2014.

Conclusion

The Postal Service’s emergency services procedures are inconsistent and need revision to ensure there is clear and consistent guidance for handling medical emergencies. Current policies could lead to delayed communication with emergency services that may result in longer response times, confusion, and delayed medical treatment, possibly resulting in more serious injury or death. In addition, these practices could lead to grievances and lawsuits against the Postal Service.

911 Emergency Services Policy

We found the following Postal Service policies regarding medical emergencies are inconsistent:

- According to the Postal Service’s national emergency services policy,² the recommended procedure for handling medical emergencies is to notify Postal Service security or a designee to have them initiate a 911 emergency services call.



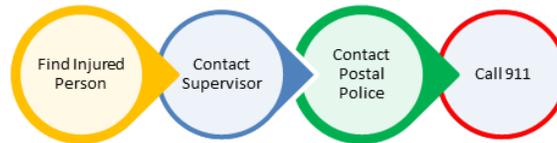
- Supervisor Safety Handbook³ requires all facilities to have a way for employees to call local emergency services from inside the building.



² *Employee and Labor Relations Manual (ELM) 37*, September 2014.

³ Handbook EL-801, *Supervisor’s Safety Handbook*, June 2008.

- The local policy for the Bay-Valley District facility required the supervisor or an employee (if the supervisor was not in the immediate area) to call postal police when someone needed emergency medical treatment. The local policy specified that only the postal police were allowed to call 911.⁴



Inconsistent policies could lead to delayed communication with emergency services, which may result in longer response times, confusion, and delayed medical treatment. For example, at some large Postal Service facilities, postal police officers or security may be at the entrance of the building, with work areas located on a different floor or up to three city blocks away. When a 911 call is made, the dispatcher normally asks a series of standard questions about the situation, such as the type of injury sustained and whether the person is conscious. Postal Service security personnel have to relay the questions back to the supervisor who is with the employee in a different location, which could result in lost time and miscommunication.

Additional Information

On November 21, 2014, the director, Industrial Relations for the American Postal Workers Union (APWU), sent a letter to the Postal Service’s vice president, Labor Relations, requesting information regarding the Postal Service’s emergency services policies and procedures.

The Postal Service’s response dated January 12, 2015,⁵ acknowledged its headquarters is responsible for establishing national emergency medical assistance policies and procedures. In its response, the Postal Service reported that it relies on ELM Section 866.2, Emergency Procedures, and “they do not prohibit an employee from contacting 911 at their discretion as it relates to an emergency. The nationally established procedures are to ensure quick and proper medical treatment for postal employees working in various sized facilities throughout the country.”

However, we identified national policies and procedures inconsistent with this statement and the local policy in the Bay-Valley District specified that only postal police should contact 911. In addition, according to district and information technology managers, it

⁴ *Emergency Medical Treatment/Calling-911*, dated January 2013.

⁵ The response was provided by the manager, Contract Administration, APWU (CA2015-10).

is not possible to dial 911 from some telephones within the Bay-Valley District facility. The Postal Service's response stated that "postal police officers and OHS personnel are trained in emergency cardiopulmonary resuscitation and first aid." The U.S. Department of Transportation's [911.gov website](#) advises that, in a medical emergency,⁶ someone should call 911 immediately from any wired or wireless phone. We identified two additional government agencies⁷ with policies that instruct employees to call 911 immediately in the event of a medical emergency and then notify security personnel.

Requiring calls for medical assistance to flow through a chain of command could cause miscommunication and delayed medical services. Delays in communicating with emergency services may result in a longer response time, confusion, and delayed medical treatment. The delays could result in more serious injury or death. In addition, these practices could lead to grievances and lawsuits against the Postal Service.

During the course of our review, management issued a revised local facility policy⁸ for the Bay-Valley District instructing everyone to immediately call 911 in an emergency without going through a chain of command. In addition, management initiated a review of the national policy related to medical emergencies and began the process to revise the ELM to instruct employees to call 911, immediately, in the event of a medical emergency; therefore, we are not making a specific recommendation to revise the national policy at this time.

Recommendations

We recommend the chief human resources officer and executive vice president:

1. Communicate interim guidance to all employees to call 911 immediately in the event of a medical emergency.
2. Require all areas and districts to make their emergency services policy consistent with the revised national policy.

We recommend the chief information officer and executive vice president:

3. Require all information technology managers to review telephone system access to emergency services and modify the telephone system to give employees the ability to call 911.

⁶ When someone is unconscious, gasping for air or not breathing, experiencing an allergic reaction, having chest pain, having uncontrollable bleeding, or exhibiting any other symptoms that requires immediate medical attention.

⁷ U.S. Department of Agriculture and the Office of Emergency Management.

⁸ *Emergency Medical Treatment/Calling-911*, dated January 2015.

Management's Comments

Management generally agreed with the findings and partially agreed with the recommendations.

Regarding recommendation 1, management stated that they communicated interim guidance to specified districts instructing employees to call 911 in a medical emergency. Management communicated this information to districts identified in the report as not having such a policy in place currently. However, management did not agree to issue interim guidance on this matter but plans to include it in the ELM revision. The target date for completion is April 30, 2015.

Regarding recommendation 2, management stated that they agreed with the finding and that incorporating the revised 911 policy into the ELM will ensure that all areas and districts have emergency services policies that are consistent with the revised national policy. The revision is currently being reviewed under article 19 of the collective bargaining agreements with all unions. The target implementation date is May 30, 2015.

Regarding recommendation 3, management stated that they agreed to inform all IT managers of the revised 911 policy and have all telephone systems checked and updated, if needed, to conform to the revised policy. The target implementation date is June 30, 2015.

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

Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendations in the report.

Regarding recommendation 1, while we continue to believe that interim guidance regarding emergency procedures would be beneficial, we believe that management's proposed action to include emergency instructions in the revised ELM to be issued by April 30, 2015, is sufficient to address our recommendation. Therefore, we will not pursue this through the audit resolution process.

The OIG considers all recommendations significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These 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.

Appendix A. Management's Comments



March 16, 2015

Lori Lau Dillard
Director, Audit Operations
1735 North Lynn Street
Arlington, VA 22209-2020

SUBJECT: Management Alert – 911 Emergency Services Policy
(Report Number HR-MA-15-DRAFT)

Thank you for the opportunity to respond to the recommendations contained in the Management Alert – 911 Emergency Services Policy (Report Number HR-MA-15-Draft) recently conducted by the office of the Inspector General. Following is the response to your recommendations to the chief human resources officer and executive vice president.

Recommendation 1

Communicate interim guidance to all employees to call 911 immediately in the event of a medical emergency

Management Response:

We communicated with the Districts identified whose policies did not instruct employees to call 911. Our national policy does not prohibit employees from calling 911. An interim memorandum containing guidance to all employees to call 911 in the event of an emergency would not be an effective action that would result in a clear message to Postal employees. The re-write of the current Employee, Labor Relations Manual on this matter is in process and will be implemented consistent with our contractual obligations found in article 19 of our Collective Bargaining Agreement. We expect that this review will be completed by April 30, at which time the guidance will be communicated to all employees.

Target Implementation date: April 30, 2015

Responsible Management Official: Vice President, Employee Resource Management

Recommendation 2

Require all Areas and Districts to make their emergency services policy consistent with the revised national policy.

Management Response:

Management agrees with this finding. By incorporating the revised policy that is currently being reviewed under article 19 of the collective bargaining agreements with all unions into the Employee, Labor Relations handbook, all Areas and Districts will have their emergency services policy consistent with the revised national policy.

Target Implementation date: May 30, 2015

Responsible Management Official: Vice President, Employee Resource Management

Recommendation 3

Require all information technology managers to review telephone system access to emergency services and modify the telephone system to give employees the ability to call 911.

Management Response:

Management agrees with this finding. Management will ensure all IT Managers are informed of the 911 policy and all PBXs (telephone systems) are checked and updated if needed to the 911 policy.

Target Implementation Date:

The necessary updates will be developed and implemented NLT June 30, 2015.

Responsible Management Official:
Manager, Enterprise Access Infrastructure


Jeffrey C. Williamson
Chief Human Resources Officer
and Executive Vice President


James P. Cochrane
Chief Information Officer
and Executive Vice President

cc: Mr. Cochrane
Mr. Godlewski
Ms. Haring
Corporate Audit and Response Management