



OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Mail Collection Box Management Process - Capital Metro Area

Audit Report

Report Number
DR-AR-17-005

May 9, 2017





OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Highlights

The improper removal of established collection boxes may adversely impact public reaction and prevent area and district management from ensuring proper collection service levels are provided to the public.

Background

Mail collection boxes, first introduced in 1858, are used primarily to collect mail from customers. Nationwide, there were about 153,000 collection boxes at the end of fiscal year (FY) 2016; however, the U.S. Postal Service has been removing under used boxes, with almost 14,000 boxes removed over the past five years. The Postal Service should evaluate under used boxes for relocation and may remove them with Area Manager, Delivery Programs Support approval, and posting a 30-day notice on the box before it is removed.

According to the Collection Point Management System (CPMS), the Capital Metro Area had 13,709 collection boxes on October 1, 2015, and removed 275 collection boxes in FY 2016. Reasons for the removals included multiple boxes at a location, property owners requested their removal, and box tampering.

The CPMS also indicated there were 467 out-of-service collection boxes for more than a week, as of September 30, 2016. Collection boxes are typically placed out-of-service for less than a week when the box is being replaced or repaired, or is temporarily inaccessible.

Our objective was to assess the process used to remove collection boxes or to place them out-of-service in the Capital Metro Area.

What the OIG Found

The Capital Metro Area and its eight districts had not established an adequate process for removing or placing collection boxes in an out-of-service status to ensure all collection box removal decisions were properly approved by area management and adequate public notice was given to customers. In FY 2016, 255 of 275 collection boxes were deleted from the CPMS without evidence of Capital Metro Area approval. In addition, 418 of 467 collection boxes listed in the CPMS as out-of-service as of September 30, 2016 had been permanently removed from the street without evidence of area approval and 305 of 418 out-of-service boxes were removed permanently without evidence of public notification to customers.

These conditions occurred because there was limited area and district oversight to approve and validate collection box removals. In addition, there were no procedures to consistently monitor collection boxes reported as out-of-service longer than seven days.

The improper removal of established collection boxes may adversely impact public reaction and prevent area and district management from ensuring proper collection service levels are provided to the public. In addition, improper removals may reduce the Postal Service's brand awareness.



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What the OIG Recommended

We recommended management revise their collection box removal process to ensure written approval is obtained from area management prior to all collection box removals and

supporting documentation is maintained for removal decisions. We also recommended management establish a process to monitor out-of-service collection boxes, including obtaining approvals and public notification.



255 collection boxes were deleted from the CPMS without evidence of Capital Metro Area approval.



418 collection boxes listed in CPMS as out-of-service had been permanently removed without evidence of Capital Metro Area approval.



305 out-of-service collection boxes were removed permanently without evidence of public notification to customers.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

May 9, 2017

MEMORANDUM FOR: LINDA M. MALONE
VICE PRESIDENT, CAPITAL METRO AREA

E-Signed by Janet Sorensen
VERIFY authenticity with eSign Desktop

A handwritten signature in cursive script, appearing to read "Janet Sorensen", written over a light gray background.

FROM: Janet M. Sorensen
Deputy Assistant Inspector General
for Retail, Delivery, & Marketing

SUBJECT: Audit Report – Mail Collection Box
Management Process – Capital Metro Area
(Report Number DR-AR-17-005)

This report presents the results of our audit of the mail collection box management process in the Capital Metro Area (Project Number 17RG007DR000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Rita F. Oliver, director, Delivery, or me at 703-248-2100.

Attachment

cc: Vice President, Delivery Operations
Corporate Audit Response Management

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Findings

The Capital Metro Area and its eight districts had not established an adequate process for removing or placing collection boxes in an out-of-service status to ensure all collection box removal decisions were properly approved by area management and adequate public notice was given to customers.

Introduction

This report presents the results of our self-initiated audit of the mail collection box management process in the Capital Metro Area (Project Number 17RG007DR000). Our objective was to assess the process used to remove collection boxes or to place them out-of-service in the Capital Metro Area. See [Appendix A](#) for additional information about this audit.

Mail collection boxes, first introduced in 1858, are used primarily to collect mail from customers. Nationwide, there were about 153,000 collection boxes at the end of fiscal year (FY) 2016; however, the U.S. Postal Service has been removing under used boxes, with almost 14,000 boxes removed over the past five years. The Postal Service should evaluate under used boxes for relocation and may remove them with Area Manager, Delivery Programs Support approval, and posting a 30-day notice on the box before it is removed.

According to the Collection Point Management System (CPMS), the Capital Metro Area had 13,709 collection boxes on October 1, 2015, and removed 275 collection boxes in FY 2016. Reasons for the removals included multiple boxes at a location, property owners requested their removal, and box tampering.

The CPMS also indicated there were 467 out-of-service collection boxes for more than a week, as of September 30, 2016. Collection boxes are typically placed out-of-service for less than a week when the box is being replaced or repaired, or is temporarily inaccessible.

Summary

The Capital Metro Area and its eight districts had not established an adequate process for removing or placing collection boxes in an out-of-service status to ensure all collection box removal decisions were properly approved by area management and adequate public notice was given to customers. In FY 2016, 255 of 275 collection boxes were deleted from the CPMS without evidence of Capital Metro Area approval. In addition, 418 of 467 collection boxes listed in the CPMS as out-of-service as of September 30, 2016 had been permanently removed from the street without evidence of area approval and 305 of 418 out-of-service boxes were removed permanently without evidence of public notification to customers.

These conditions occurred because there was limited area and district oversight to approve and validate collection box removals. In addition, there were no procedures to consistently monitor collection boxes reported as out-of-service longer than seven days.

The improper removal of established collection boxes may adversely impact public reaction and prevent area and district management from ensuring proper collection service levels are provided to the public. In addition, improper removals may reduce the Postal Service's brand awareness.

234 of the 275 deletions from the CPMS (85 percent) were for collection boxes that had been placed out-of-service more than 60 days before any documented requests were made to the area for approval to remove the box.

Collection Box Removal Management

Of the 275 Capital Metro Area collection boxes deleted from the CPMS during FY 2016, there was insufficient evidence to show that 255 (93 percent) were approved for removal by the Capital Metro Area, as required by policy (see Table 1). Postal Service guidance states, “There can be no collection point removals, relocations, or changes in the last pickup time without written approval from each Area Manager, Delivery Programs Support.”¹ In addition, Postal Service policy was updated on December 24, 2015, to also state, “If, after a collection box has been vandalized or tampered with, the location is determined to be unsecured by the Area Manager, Delivery Programs Support, the box may be removed immediately without notice” and that the “Area Manager, Delivery Programs Support, must authorize all collection box removals.”²

Table 1. Capital Area Removed Collection Boxes

District	Collection Box Deletions From CPMS ³	Insufficient Evidence of Area Approval	Percentage of Unsupported Removals
Atlanta	20	19	95%
Baltimore	41	29	71%
Capital	200	198	99%
Greater South Carolina	0	0	0%
Greensboro	2	0	0%
Mid-Carolinas	5	4	80%
Northern Virginia	2	1	50%
Richmond	5	4	80%
Capital Metro Area Total	275	255	93%

Source: U.S. Postal Service Office of Inspector General (OIG) analysis of Enterprise Data Warehouse (EDW) CPMS Blue Box Count Report and documentation of Capital Metro Area approvals.

While management was able to provide some documentation to show they had approved 72 of the collection boxes deleted from the CPMS, our analysis indicates most of these collection boxes had been physically removed and placed out-of-service well before the box was deleted from the CPMS. For example, 234 of the 275 deletions from the CPMS (85 percent) were for collection boxes that had been placed out-of-service more than 60 days before any documented requests were made to the area for approval to remove the box. On average, the 275 collection boxes had been physically removed and out-of-service for 544 days, prior to their deletion from the CPMS (see Table 2). Management stated that after a collection box has been physically removed, the district should submit a request in the CPMS to delete the box record. Postal Service policy requires the information recorded in the CPMS to be accurate and complete, and must be reviewed at least annually to ensure accuracy.⁴

¹ *Collection Point Guidebook, March 2012.*

² *Postal Operations Manual Issue 9, July 2002, updated with Postal Bulletin revisions through December 24, 2015, Section 315.4.*

³ This represents collection boxes deleted from the CPMS during FY 2016.

⁴ *Postal Operations Manual Issue 9, July 2002, updated with Postal Bulletin revisions through December 24, 2015, Section 314.1.*

We found 418 (90 percent) of these out-of-service boxes were permanently removed from the street without evidence of Capital Metro Area approval.

Table 2. Analysis of Removed Collection Boxes in an Out-of-Service Status

District	Collection Box Removals From the CPMS	Average Number of Days Collection Boxes Were Out-of-Service Prior to Removal	Collection Boxes Out-of-Service More Than 60 Days Before Removal	Percentage of Collection Boxes Out-of-Service More Than 60 Days Before Removal
Atlanta	20	13	1	5%
Baltimore	41	210	30	73%
Capital	200	688	194	97%
Greater South Carolina	0	0	0	0%
Greensboro	2	33	0	0%
Mid-Carolinas	5	300	4	80%
Northern Virginia	2	62	1	50%
Richmond	5	152	4	80%
Total	275	544	234	85%

Source: OIG analysis of EDW CPMS Blue Box Count Report and CPMS out-of-service data.

Further, analysis of collection boxes listed in the CPMS as out-of-service as of September 30, 2016, indicated there were 467 Capital Metro Area collection boxes that were listed as out-of-service for more than a week.⁵ According to Postal Service Headquarters, collection boxes are typically placed out-of-service for less than a week when the box is being replaced or repaired, or is temporarily inaccessible. A collection box out-of-service longer than a week may indicate the box is being relocated or permanently removed.

We found 418 (90 percent) of these out-of-service boxes were permanently removed from the street without evidence of Capital Metro Area approval (see Table 3). In addition, management could not provide evidence of 30 day public notice for 305 (73 percent) of these removals. After our inquiries of the out-of-service collection boxes, district management took corrective action and immediately returned to service eight of the 467 collection boxes that had mistakenly been left out-of-service. Postal Service policy states, “If a collection box will be removed or relocated, a notice to that effect for customers must be placed on the box 30 days prior to the removal or relocation showing the locations and collection schedules for other collection points in the vicinity.”⁶

Collection Boxes Places Out-of-Service

The Capital District routinely places collection boxes out-of-service for parades or events by physically removing them or placing a locking bar on the box opening (see Figure 1).

Figure 1. Collection Box Places Out-of-Service



Source: Photo taken by the Capital District and provided to the OIG.

⁵ The Postal Service does not have a national policy for out-of-service collection boxes. We plan to conduct a separate review of out-of-service collection boxes in a future audit.

⁶ Postal Operations Manual Issue 9, July 2002, updated with Postal Bulletin revisions through October 15, 2015, Section 315.4.

Table 3. Analysis of Days Collection Boxes Placed in an Out-of-Service Status

District	Total Collection Boxes Out-of-Service More Than a Week	Average Number of Days Collection Boxes Were Out-of-Service⁷	Collection Boxes Improperly Removed Without Area Approval⁸	Percentage of Improper Removals
Atlanta	4	19	0	0%
Baltimore	128	246	117	91%
Capital	143	447	133	93%
Greater South Carolina	72	578	71	99%
Greensboro	14	68	0	0%
Mid-Carolinas	87	686	87	100%
Northern Virginia	10	177	4	40%
Richmond	9	190	6	67%
Total	467	431	418	90%

Source: OIG analysis of the CPMS out-of-service data and responses provided by Capital Metro Area district officials.

The conditions occurred for the following reasons:

- Area and district management provided limited oversight of the collection box removal process. Specifically, the Capital Metro Area and district officials primarily used email and the CPMS notifications to manage box removals, but 93 percent of the removals had insufficient evidence of Area Manager, Delivery Programs Support approval. The CPMS could not provide adequate support for area level approval, as most of the CPMS approvals occurred more than 60 days after the boxes had been physically removed. Furthermore, a review of the CPMS access levels indicated six non-Capital Metro Area officials had the ability to approve removal of collection boxes from the CPMS. Management took immediate corrective action after our inquiries and revoked the CPMS area and district administrator rights to 31 employees that no longer required that level of access. Postal Service policy states that prompt, economical, and efficient services should be provided which are responsive to the needs of the communities⁹ served and management must follow an established process to implement change.¹⁰
- Area and district management had not established procedures to adequately monitor collection boxes placed into an out-of-service status for more than a week to ensure they were promptly returned to service or properly approved for removal or relocation. With the exception of the Atlanta and Greensboro districts, area and district officials did not adequately monitor out-of-service boxes to ensure they were returned to service within a week. Management stated that a number of these out-of-service boxes were emergency removals that were meant to be temporary; however, management no longer plans to return them to service. In addition, several of the districts indicated the Capital Metro Area directed them to evaluate locations with multiple boxes to determine whether one or more of the boxes could be removed. However due to administrative oversight,

⁷ This calculation includes only Capital Metro Area collection boxes out of service more than a week as of September 30, 2016, and represents the number of days a collection box was out of service from the time it was placed out of service until the listing was generated on September 30, 2016.

⁸ This calculation includes collection boxes that were physically removed several years earlier, but were left in an out-of-service status in the CPMS.

⁹ *Postal Operations Manual Issue 9, July 2002, updated with Postal Bulletin revisions through December 24, 2015*, Section 313.11.

¹⁰ *Collection Point Guidebook, March 2012*.

these districts physically removed the unneeded boxes they identified and placed them out-of-service, without obtaining area approval to remove the specific boxes.

The improper removal of established collection boxes may cause adverse public reaction and prevent area and district management from ensuring proper collection service levels are provided to the public while minimizing the cost of this service and maximizing productivity. In addition, beyond just collecting mail, collection boxes have value as a marketing tool and serve as a visual reminder of the Postal Service. Improper reductions in the number of collection boxes may come at the cost of reducing the Postal Service's brand awareness.

Recommendations

We recommend management revise their collection box removal process and establish a process to monitor out-of-service collection boxes, including obtaining approvals and public notification.

We recommend the Vice President, Capital Metro Area:

1. Revise their collection box removal process to ensure written approval from area management prior to all collection box removals and require that area and district officials maintain supporting documentation for the removal decisions for a minimum of two years.
2. Establish a process to monitor out-of-service collection boxes, including obtaining approvals and public notification.

Management's Comments

Management disagreed with the finding, partially agreed to recommendation 1, and agreed with recommendation 2. Management did not agree that the Capital Metro Area and its districts had not established an adequate process for removing collection boxes. Management stated the single point initiative allowed for the removal of collection boxes from a point with multiple boxes as long as at least one remained. Management stated of the 275 boxes removed from the CPMS during FY 2016 in the Capital Metro Area, 120 of them fell under this initiative. Further management did not agree with the methodology used throughout the audit, as it relied to a large degree upon interviews of various personnel about events that took place, in many cases, more than a year prior.

Management also stated that to ensure customers have sufficient locations available to deposit mail, any box that was removed or put out of service in 2016 that was not part of the single point initiative or removed at the customer's request, due to construction, vandalism or safety reasons is being placed back on the street. Management stated these boxes will be subject to evaluation and potential removal after a suitable period of time.

In response to recommendation 1, management stated they do not agree with the establishment of a specific retention period for the documentation, however a standard work and request form has been developed and approval, either written or electronic, must be obtained from area management prior to the permanent removal of any collection box. The target implementation date was April 30, 2017.

In response to recommendation 2, management stated a standard work and request form has been developed to request placement of boxes to out-of-service. Area management stated they will monitor out-of-service boxes, ensure compliance with the approval process and provide public notification whenever possible. The target implementation date was April 30, 2017.

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

Evaluation of Management's Comments

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

Regarding management's disagreement that they had not established an adequate process for removing collection boxes, our analysis supports the conclusions in our report. We agree the removal of collection boxes under a single point initiative would be allowed under previous manuals and headquarters directives. The process for removing these boxes, however, would be no different than the process used to remove collection boxes that receive an average of fewer than 25 pieces of mail a day, or had been vandalized, or that represented a safety concern. These are all acceptable reasons to remove a collection box, with the

approval of the Area Manager, Delivery Programs Support. Unfortunately, only 20 of the 275 collection boxes removed from the CPMS during FY 2016 had sufficient documentation showing Capital Metro Area approval to remove the box. In the case of the boxes removed under the single point initiative, management was able to provide a listing of addresses sent to the Districts in January 2014 that identified locations with multiple boxes and instructions on how to submit a request to the area to remove one or more boxes from the locations. An adequate process for removing collection boxes would have ensured these collection boxes had been evaluated and approved for removal from the CPMS in FY 2014, rather than two years later in FY 2016.

Regarding management's disagreement with the audit methodology to interview various personnel about the circumstances that led to collection box removals, the lack of available documentation maintained by the area or districts contributed to the need to interview area and district personnel to understand the process used to remove or place collection boxes in an out-of-service status. As stated in the report, management was able to provide some documentation to show they had approved 72 of the 275 collection boxes deleted from the CPMS. However, our analysis indicated most of these collection boxes had been physically removed and placed out-of-service well before the box was deleted from the CPMS. As such, the deletion from the CPMS was not adequate support for area level approval, when the decision to physically remove the box was made months, sometimes years earlier.

Regarding management's partial agreement with recommendation 1, management's proposed action to implement a standard work order and request form requiring area approval before the permanent removal of any collection box, satisfies the intent of our recommendation. We note that in absence of additional guidance, this form falls under existing document retention guidelines.

On May 4, 2017, management provided the OIG with the new area instructions outlining the process and required approvals for mail collection box removal and out of service status. This was distributed to all Capital Metro Area district managers. Therefore, the OIG considers these recommendations closed with the issuance of this report.

Appendices

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to the right to navigate
to the section content.*

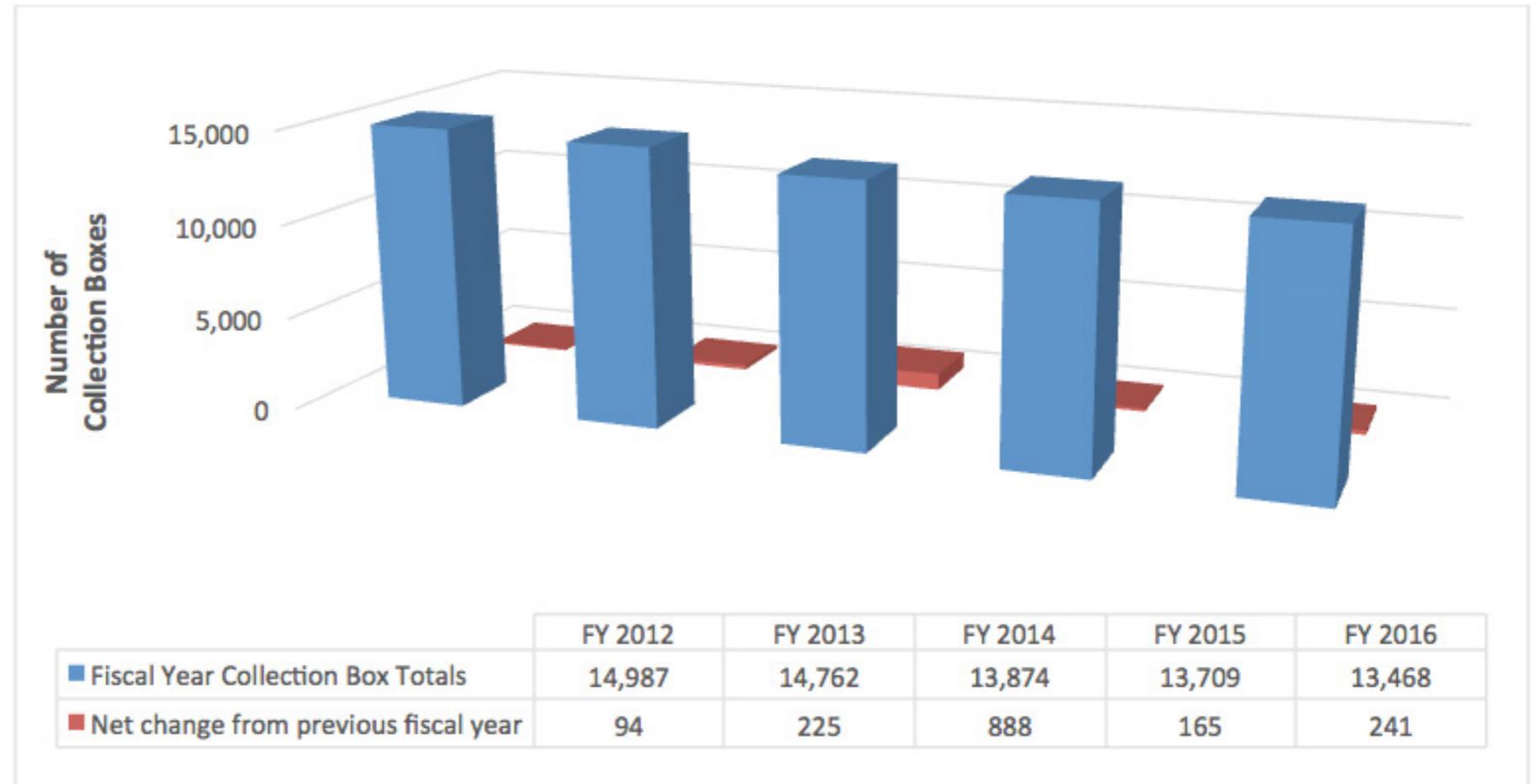
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Appendix A: Additional Information

Background

Collection boxes were first introduced in 1858. The boxes originally had a number of purposes including serving as storage for carriers who made their rounds on foot, holding items such as rain gear and coats. However, now that most carriers have vehicles, these items are kept in the delivery vehicle and the mailboxes are used primarily to collect mail. In the Capital Metro Area the number of collection boxes has declined by about 1,600 over the past five years. The following table shows the net change¹¹ in the number of Capital Metro Area collection boxes for the past five fiscal years (see Figure 2).

Figure 2. Capital Metro Area Collection Box Totals



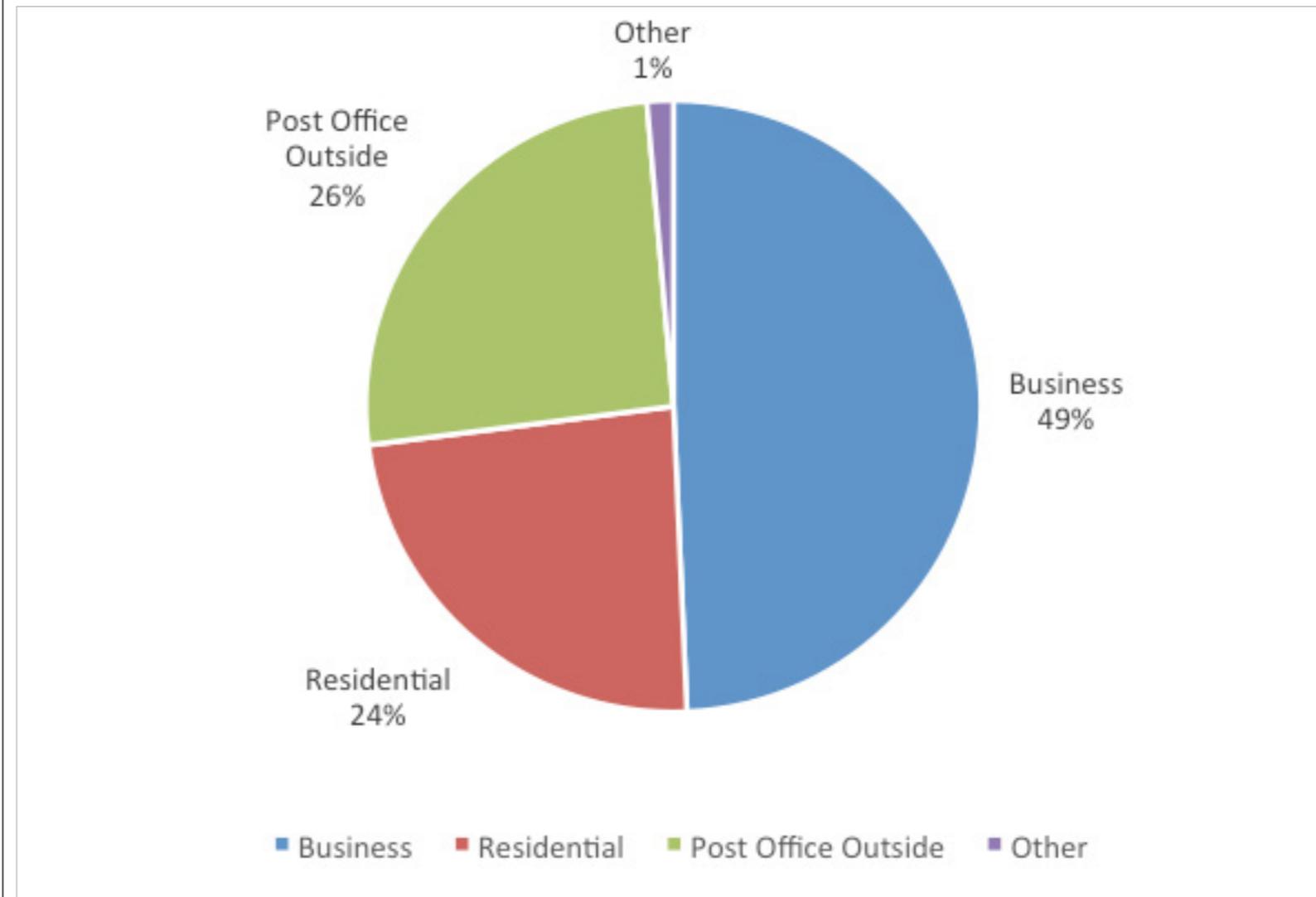
Source: EDW-CPMS Capital Metro Blue Box reports for each fiscal year end date.

Collection points are locations where a customer drops off mail for collection by the Postal Service. These boxes are an important access channel for single-piece First-Class Mail. They can include collection boxes, mail chutes, firm pickups, self-service kiosks, lobby drops, and mail collection racks. Each district is required to enter all collection points within its boundaries into the CPMS, a database that includes collection point addresses, location types (such as business, residential, or Post Office lobby), box types (such as standard, jumbo, or snorkel), days of the week the point is accessed, and the times it is accessed, including the final collection time. Collection boxes are a subset of collection points.

¹¹ Net change includes both collection box additions and removals.

Our analysis of Capital Metro Area collection boxes identified 13,468 collection boxes as of September 30, 2016. About 26 percent (3,454 boxes) were located outside of a post office. The remaining 74 percent (10,014 boxes) were located throughout the communities, mostly in business areas (49 percent) and residential locations (24 percent) (see Figure 3).

Figure 3. Capital Metro Area Collection Box Locations



Source: Postal Service EDW CPMS Blue Box Count Report.

The CPMS is a nationwide database that manages information pertaining to all collection points, including Postal Service regular and Express Mail collection points. The CPMS provides a user interface that facilitates the entry and modification of data in the database while providing other services such as printing collection box labels. The national database is a major source of information for management review and analysis of trends affecting collection boxes throughout the Postal Service. It is also available as a resource for auditing firms that perform independent audits of Postal Service customer service. The basic building block of the national database is the information provided by each district.

To identify which boxes are underperforming, a Postal Service employee conducts a density check that involves counting pieces of mail per day over a period of two weeks. According to the *Postal Operations Manual*, if a mailbox is not receiving an average of 25 pieces per day, the Postal Service should evaluate it for relocation within the neighborhood or community to a potentially higher volume location and may remove it with Area Manager, Delivery Programs Support approval after reviewing potential relocation options. The Postal Service is required to post a 30-day notice on the box before it is removed, and customers are invited to comment.

If a collection box is temporarily unable to be collected from, the Postal Service can place the box into an out-of-service status, until collection services are restored. For example, the Greensboro District has purchased custom secured canvas bags for collection boxes that have to be taken out-of-service due to weather emergencies (see Figure 4).

Figure 4. Out-of-Service Collection Box



Source: Photo taken by the Greensboro District and provided to the OIG.

Objective, Scope, and Methodology

Our objective was to assess the process used to remove collection boxes or to place them out-of-service in the Capital Metro Area. To accomplish our objective, we:

- Reviewed and evaluated criteria and procedures related to mail collection box removals.
- Selected the Capital Metro Area for review, based on the results of the most recent nationwide collection box density test conducted during a two week period in September 2016, which indicated the number of Capital Metro Area collection box removals and out-of-service boxes were representative of the other Postal Service areas of operation.

- Interviewed the Postal Service Headquarters senior delivery specialist, and the Capital Metro Area Manager, Delivery Programs Support to gain a better understanding of National and Capital Metro Area collection box removal process.
- Obtained, reviewed, and analyzed mail collection box data from CPMS to identify Capital Metro Area collection boxes removed and relocated in FY 2016 and collection boxes in an out-of-service status for seven days or more as of September 30, 2016.
- Reviewed CPMS Area and District Administrative users, as these two roles have significant responsibilities associated with collection box removals and record changes, to assess appropriate access.
- Conducted site visits to the Capital Metro Area and the Capital District and interviewed each of the eight Capital Metro Area districts about their collection box processes. We obtained supporting documentation, and reviewed district and local management’s analysis of removal/relocation decisions and out-of-service collection boxes.
- Discussed results of the audit with Postal Service management, including the Vice President, Capital Metro Area and the Capital Metro Area Manager, Delivery Programs Support.

We conducted this performance audit from November 2016 through May 2017 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management on April 5, 2017, and included their comments where appropriate.

We assessed the reliability of the CPMS data by interviewing agency officials knowledgeable about the data and conducting limited data testing. Specifically, we requested and reviewed supporting documentation for all FY 2016 Capital Metro Area collection boxes removed, relocated, or placed out-of-service, as well as, supporting documentation for a statistical sample of under used boxes. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Collection Box Removal Process – Eastern Area</i>	To assess the collection box removal process in the Eastern Area.	DR-AR-16-007	8/22/2016	\$3.5 million

Appendix B: Management's Comments

AREA VICE PRESIDENT
CAPITAL METRO AREA OPERATIONS



April 28, 2017

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Mail Collection Box Management Process
DR-AR-17-DRAFT

Thank you for providing the Postal Service with the opportunity to review and comment on the subject draft Management Advisory. Management greatly appreciates the opportunity to provide feedback and collaborate during the development of the advisory to ensure the highest level of accuracy possible.

We do not agree that the Capital Metro Area and its eight districts had not established an adequate process for removing collection boxes. Previous manuals and HQ directives had, under the single point initiative, allowed for the removal of collection boxes from a point with multiple boxes as long as at least one remained. An analysis of the 275 boxes removed from Collection Point Management System (CPMS) during FY 2016 in the Capital Metro Area reveals that 120 of them fell under this initiative.

We also do not agree with the methodology used throughout this audit. The audit relies to a large degree upon interviews of various personnel about events that took place, in many cases, more than a year prior.

Data was taken from the CPMS system which is used to manage the collection points. Any record, once removed from the system, is no longer available for retrieval. Removal of a collection point from CPMS cannot occur until after the physical removal of the collection box from the street.

To ensure that our customers have sufficient locations available to deposit mail, any box that was removed or put out of service in 2016 that was not part of the single point initiative or removed at the customer's request, due to construction, vandalism or safety reasons is being placed back on the street. These boxes will be subject to evaluation and potential removal after a suitable period of time.

Recommendation 1:

Revise their collection box removal process to ensure written approval from area management prior to all collection box removals and require that area and district officials maintain supporting documentation for the removal decisions for a minimum of two years.

Management Response/Action Plan:

Management partially agrees with this recommendation. We do not agree with the establishment of a specific retention period for the documentation. A standard work and request form has been developed regarding removal of collection boxes from the street and the CPMS system. Approval, either written or electronic, must be obtained from area management prior to the permanent removal of any collection box.

MAILING ADDRESS:
16501 SHADY GROVE ROAD
GAITHERSBURG MD 20898-9998
301-548-1410
FAX: 301-548-1434

Target Implementation Date:

April 2017

Responsible Official:

Manager Delivery Programs Support, Capital Metro Area

Recommendation 2:

Establish a process to monitor out-of-service collection boxes, including obtaining approvals and public notification.

Management Response/Action Plan:

Management agrees with this recommendation. A standard work has been developed to request placement of boxes to out-of service. Area management will monitor boxes that are out-of-service and ensure compliance with the approval process. Public notification will occur whenever possible, but, in many cases, is impossible to provide due to emergency removals for circumstances such as vandalism and safety issues.

Target Implementation Date:

April 2017

Responsible Official:

Manager Delivery Programs Support, Capital Metro Area



Linda M. Malone
Vice President, Capital Metro Area

cc: R. Stines
S. Vacca
J. Atherly
M. Wong
E. Simmons



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