



Office of Inspector General | United States Postal Service

Audit Report

Delayed Mail Reporting in the Great Lakes Area

Report Number NO-AR-18-005 | May 17, 2018

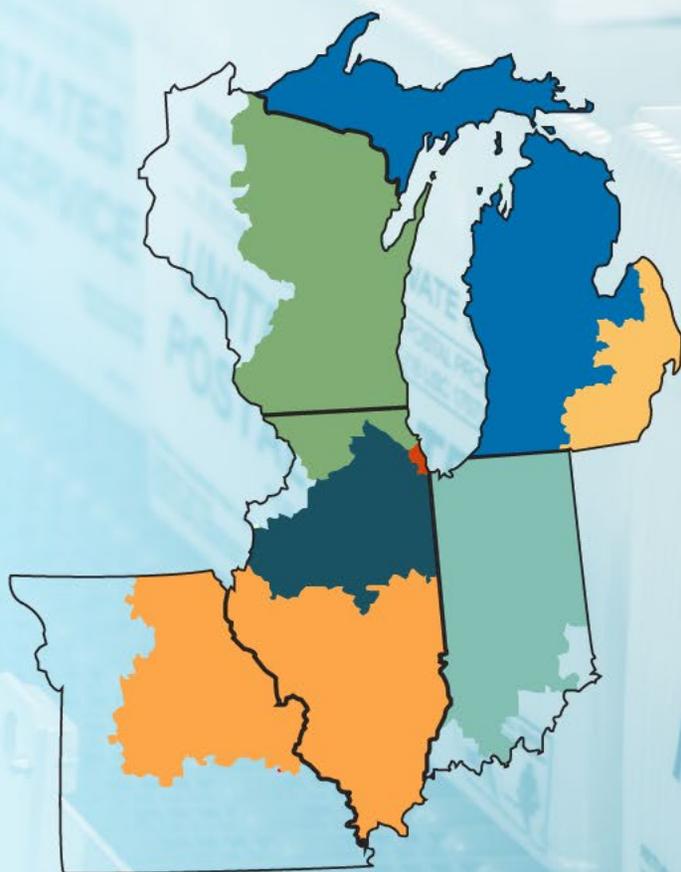


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Highlights

Objective

The objective of our audit was to determine the accuracy of delayed mail reporting at three selected facilities in the Great Lakes Area.

The U.S. Postal Service considers mail to be delayed when it is not processed in time to meet the established delivery day. Mail processing facilities are required to complete daily mail counts and self-report on-hand mail, delayed mail, late-arriving mail, and mail processed after the cut-off time and enter the information into the Web Mail Condition Reporting System (MCRS).

Mail processing facilities use the MCRS to report their daily mail count, providing the Postal Service with a standardized national view of mail conditions at processing facilities. MCRS information is available to management officials at all levels for analysis, forecasting, and planning.

We selected the Detroit Network Distribution Center (NDC) in Allen Park, MI, the Michigan Metroplex Processing and Distribution Center (P&DC) in Pontiac, MI, and the Lansing, MI, P&DC for review based on allegations received regarding facilities not accurately reporting delayed mail. We conducted three unannounced site visits on March 6, 2018, at the selected facilities to determine if delayed mail was being accurately reported.

What the OIG Found

We found the facilities accurately reported their delayed mail and there was no significant difference between our counts and Postal Service's reported delayed

mail volumes on the day of our observations. Specifically, there was a difference of 1,062 pieces, or about 0.31 percent, between our count and the amount reported in MCRS for the three facilities.

However, the Michigan Metroplex and Lansing P&DCs did not include all late arriving mail and plan failure mail (mail processed after the established cut-off time for completing mail processing) in their MCRS reports. According to the Mail History Tracking System and the Enterprise Data Warehouse, the P&DCs had about 5,500 pieces of late arriving mail and over 690,000 pieces of plan failure mail on the date of our observations; however, the facilities reported no late arriving mail and only 83,000 pieces (or about 12 percent) of the plan failure in their MCRS reports. Management at both facilities said they were not aware of the requirement to include late arriving and plan failure mail in their MCRS reports.

A prior U.S. Postal Service Office of Inspector General report identified these issues at other mail processing facilities across the nation and we have an open recommendation to correct the issue. When mail condition reports are not accurate, management uses incorrect information to make decisions on staffing, mail processing equipment use, transportation of mail, and preventive maintenance. This can ultimately affect performance goals and service standards.

We also inspected parked trailers at the three facilities for unaccounted mail and found a trailer at the Detroit NDC with 1,841 pieces of First-Class Mail and two pieces of Priority Mail dated as old as November 2017 mixed in with the Undeliverable Bulk Business Mail (UBBM) mail for recycling. These mailpieces did not have any markings showing they were undeliverable or to be returned to sender and they were processed for delivery. We determined which delivery units were responsible for some of these mailpieces and referred this information to our Office of Investigations.

“The objective of our audit was to determine the accuracy of delayed mail reporting at three selected facilities in the Great Lakes Area.”

UBBM is mail the Postal Service cannot deliver because of an expired change of address; or an incorrect, incomplete, or illegible address. By agreement, the Postal Service does not return UBBM to the business mailer, but recycles it. The Detroit NDC is a recycling center for other facilities to send their UBBM mail for compacting.

Management was unaware that deliverable mail was mixed in with the UBBM for over a month. They said the delivery units are responsible for inspecting the mail to ensure there is no deliverable mail included before it is sent to them for recycling.

Management took immediate action when we notified them of the mail we found in the trailer. All of the mail was sorted and any mail that was considered deliverable was taken to mail processing. When Postal Service staff does not verify that UBBM does not contain deliverable mail, there is a risk deliverable mail could be destroyed.

In addition, the three facilities did not have accurate operating plans that reflected current mail processing operations. Specifically:

- The Detroit NDC's operating plan dated January 2012 did not list start and end times for sorting Priority Mail.
- The Michigan Metroplex P&DC's operating plan dated September 2016 had scheduled mail arriving at the facility past the critical start and end times.
- The Lansing P&DC's operating plan dated December 2003 did not reflect that mail cancellation is no longer performed at this facility.

Great Lakes Area management agreed that they should review and update operating plans annually. They said the next review would be in the spring of 2018, but have not set a specific date. Postal Service policy requires accurate operating plans to assist management in the scheduling, processing, and delivery of mail volume. When operating plans are not accurate, there is an increased risk that mail will not be processed in time to meet its service performance goal.

What the OIG Recommended

We recommended management ensure that:

- Staff responsible for daily MCRS reporting are trained so they are aware of the requirement to include late arriving and plan failure mail;
- Delivery unit staff in the Great Lakes Area are following standard operating procedures for handling UBBM;
- Plant management at the Detroit NDC develop a standard operating procedure to verify deliverable mail is not mixed in with UBBM when it is received at the facility; and
- All Great Lakes Area mail processing facilities have accurate operating plans that reflect current mail processing operations.

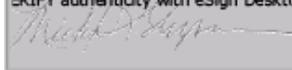
Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

May 17, 2018

MEMORANDUM FOR: Erica A. Brix
Acting Vice President, Great Lakes Area

E-Signed by Michael Thompson
VERIFY authenticity with eSign Desktop


FROM: Michael L. Thompson
Deputy Assistant Inspector General
for Mission Operations

SUBJECT: Audit Report – Delayed Mail Reporting in the
Great Lakes Area (Report Number NO-AR-18-005)

This report presents the results of our audit of Delayed Mail Reporting in the Great Lakes Area (Project Number 18XG011NO000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Margaret McDavid, Director, Network Processing, or me at 703-248-2100.

Attachment

cc: Postmaster General
Corporate Audit Response Management
Chief Operating Officer and Executive Vice President
Vice President, Network Operations

Results

Introduction/Objective

This report presents the results of our self-initiated audit of Delayed Mail Reporting in the Great Lakes Area (Project Number 18XG011NO000). The objective of our audit was to determine the accuracy of delayed mail reporting at three selected facilities in the Great Lakes Area.

Background

The U.S. Postal Service considers mail to be delayed when it is not processed in time to meet the established delivery day. Mail processing facilities are required to complete daily mail counts and self-report on-hand mail,¹ delayed mail, late-arriving mail,² mail processed after the established cut-off time for completing mail processing (plan failure)³ and enter the information into the Web Mail Condition Reporting System (MCRS). Mail processing facilities use MCRS to report their daily mail count, providing the Postal Service with a standardized national view of mail conditions at processing facilities. MCRS information is available to management officials at all levels for analysis, forecasting, and planning.

“Mail processing facilities use MCRS to report their daily mail count, providing the Postal Service with a standardized national view of mail conditions at processing facilities.”

On March 6, 2018, we conducted three unannounced visits at the following facilities to determine if delayed mail was being accurately reported:

- The Detroit Network Distribution Center (NDC) in Allen Park, MI;
- The Michigan Metroplex Processing and Distribution Center (P&DC) in Pontiac, MI; and
- The Lansing, MI, P&DC.

We based our site selection on allegations received by the U.S. Postal Service Office of Inspector General’s (OIG) Office of Investigations regarding facilities not accurately reporting delayed mail. We conducted daily mail counts to determine if these facilities were accurately counting and reporting delayed mail for all classes of mail.

Finding #1: Late Arriving and Plan Failure Mail Not Reported

We found the facilities accurately reported their delayed mail and there was no significant difference between our counts and Postal Service’s reported delayed mail volumes on the day of our observations (see Table 1).

Table 1: OIG Count of Delayed Mail Compared to MCRS Report

Facility	OIG Count	MCRS Report	Difference	Percentage Difference
Michigan Metroplex P&DC	327,600	327,763	-163	-0.05%
Lansing P&DC	15,591	15,591	0	0.00%
Detroit NDC	1,447	2,346	-899	-62.13%
Total	344,638	345,700	-1,062	-0.31%

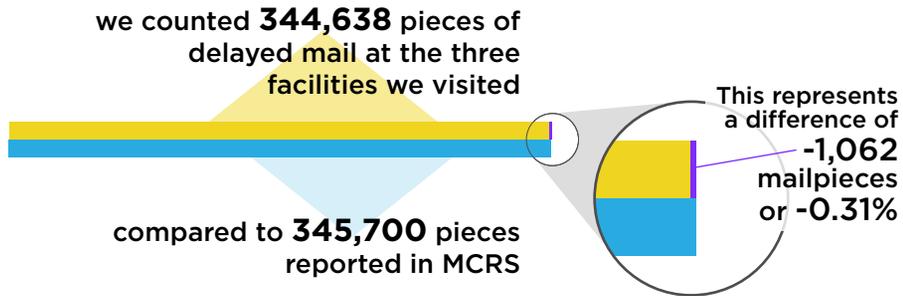
Source: MCRS and OIG observations and analyses.

¹ Total inventory of all available mail.

² Volume of mail received after the latest time facilities can process it to meet service standards.

³ Occurs when mail is entered into an operation prior to the latest time it can be processed, but is completed after the processing cut-off time.

OVERALL



Overall, we counted 344,638 pieces of delayed mail at the three facilities we visited compared to 345,700 pieces reported in MCRS. This represents a difference of minus 1,062 mailpieces, or -0.31 percent. At the Detroit NDC, we counted 899 fewer mailpieces, or about 62 percent less than what was reported in MCRS. Detroit NDC management said there could have been a difference between how the OIG accounted for less-than-full containers of mail compared to how Postal Service personnel accounted for these containers in MCRS. For example, a hamper counted as a quarter full by OIG auditors may have been counted as half full by Postal Service personnel.

The Michigan Metroplex and Lansing P&DCs did not include all late arriving mail and plan failure mail in their MCRS reports. According to the Mail History Tracking System (MHTS)⁴ and the Enterprise Data Warehouse (EDW)⁵, the P&DCs had about 5,500 pieces of late arriving mail (see Table 2) and over 690,000 pieces

of plan failure mail (see Table 3) on the date of our observations; however, the facilities reported no late arriving mail and only 83,000 pieces (or about 12 percent) of the plan failure in their MCRS reports. Management at both facilities said they were not aware of the requirement to include late arriving and plan failure mail in their MCRS reports. Postal Service policy directs that all mail volume, regardless of the amount, must be counted for recording and reporting in MCRS.⁶ This includes plan failure mail and all delayed volume categories of mail, including late arriving mail.

“Postal Service policy directs that all mail volume, regardless of the amount, must be counted for recording and reporting in MCRS.”

Table 2: Late Arriving Mail

Facility	Late Arriving Mail Reported in MCRS	Total Late Arriving Mail	Percentage of Late Arriving Mail Reported
Michigan Metroplex P&DC	0	4,332	0%
Lansing P&DC	0	1,193	0%
Total	0	5,525	0%

Source: MCRS and MHTS data for late arriving mail on March 6, 2018.

⁴ An online application that provides diagnostic tracking by individual mailpieces.

⁵ The repository intended for all data and the central source for information on retail, financial, and operational performance.

⁶ *Mail Condition Reporting System User's Guide*, Section 3, MCRS Basics, dated April 2011.

Table 3: Plan Failure Mail

Facility	Plan Failure Reported in MCRS	Total Plan Failure	Percentage of Plan Failure Reported
Michigan Metroplex P&DC	82,978	689,986	12.03%
Lansing P&DC	0	616	0%
Total	0	690,602	12.03%

Source: MCRS and EDW data for plan failure mail on March 6, 2018.

A prior OIG report identified these issues at other mail processing facilities across the nation and we have an open recommendation to correct the issue.⁷ When mail condition reports are not accurate, management uses incorrect information to make decisions on staffing, mail processing equipment use, transportation of mail, and preventive maintenance. This can ultimately affect performance goals and service standards.

Recommendation #1:

The Acting Vice President, Great Lakes Area, ensure staff responsible for daily Mail Condition Reporting System reporting are trained so they are aware of the requirement to include late arriving and plan failure mail.

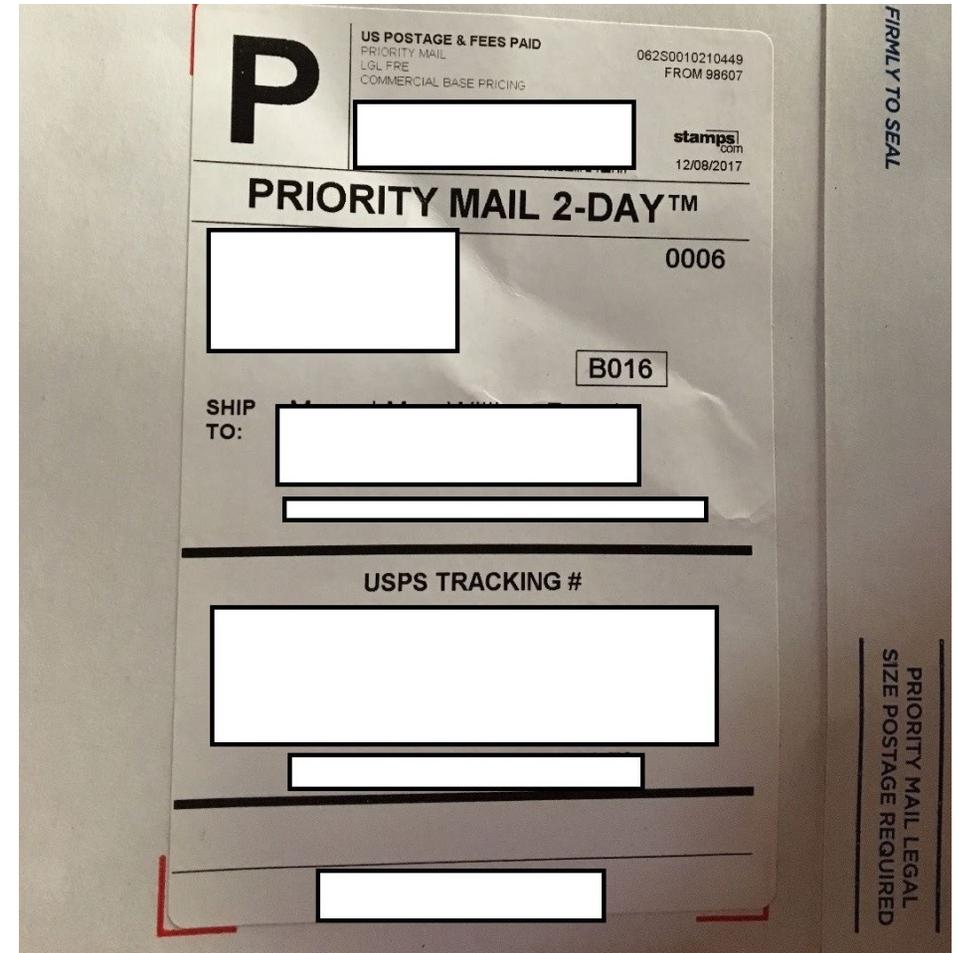
Finding #2: Deliverable Mail Mixed with Undeliverable Bulk Business Mail

We also inspected parked trailers at the three facilities for unaccounted mail and found a trailer at the Detroit NDC with 1,841 pieces of First-Class Mail and two pieces of Priority Mail dated as old as November 2017 mixed in with the Undeliverable Bulk Business Mail (UBBM) mail for recycling. These mailpieces did not have any markings showing they were undeliverable or to be returned

⁷ *Delayed Mail Validation* (Report Number NO-AR-16-011, dated August 10, 2017).

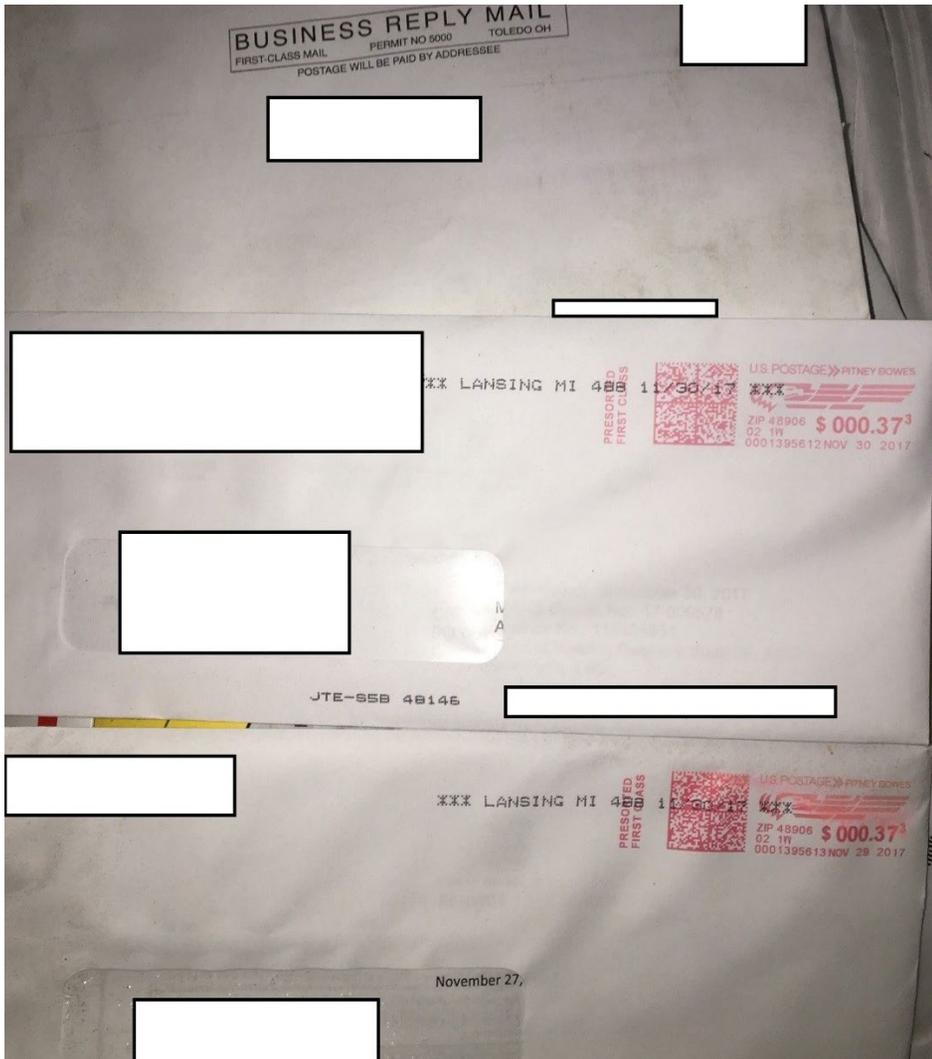
to sender and they were processed for delivery (see Figure 1 and Figure 2). We determined some of the delivery units responsible for some of these mailpieces and have referred this information to our Office of Investigations.

Figure 1. Priority Mail Piece Found Mixed with UBBM



Source: OIG photograph taken March 6, 2018, of a Priority Mail piece dated December 8, 2017, found mixed with UBBM at the Detroit NDC.

Figure 2. First-Class Mail Pieces Found Mixed with UBBM



Source: OIG photograph taken March 6, 2018, of First-Class Mail pieces dated November and December 2017, found mixed with UBBM at Detroit NDC.

On June 21, 1995, the U.S. Environmental Protection Agency issued a ruling that UBBM is considered post-consumer material, enhancing its value as a recycling commodity. UBBM is mail the Postal Service cannot deliver because of an expired change of address; or an incorrect, incomplete, or illegible address. By agreement, the Postal Service does not return UBBM to the business mailer, but recycles it. The Detroit NDC is a recycling center to which other facilities send their UBBM mail for compacting.

“UBBM is mail the Postal Service cannot deliver because of an expired change of address; or an incorrect, incomplete, or illegible address.”

Management was unaware that deliverable mail was mixed in with the UBBM for over a month and said delivery units are responsible for inspecting the mail to ensure there is no deliverable mail included before it is sent to them for recycling.⁸

Management took immediate action when we notified them of the mail we found in the trailer. All the mail was sorted and any that was considered deliverable was taken to mail processing. When Postal Service staff does not verify UBBM mail does not contain deliverable mail, there is a risk deliverable mail could be destroyed.

Recommendation #2:

The Acting Vice President, Great Lakes Area, ensure delivery unit staff in the Great Lakes Area are following the standard operating procedures for handling Undeliverable Bulk Business Mail.

⁸ U.S. Postal Service Management Instruction AS-550-95-14, *Recycling of Discarded Mail and Undeliverable Bulk Business Mail*, September 1, 1995.

Recommendation #3:

The Acting Vice President, Great Lakes Area, ensure plant management at the Detroit Network Distribution Center develop a standard operating procedure to verify deliverable mail is not mixed in with Undeliverable Bulk Business mail when it is received at the facility.

Finding #3: Operating Plans Not Updated

We found that the three facilities selected for visits did not have accurate operating plans that reflected current mail processing operations. Specifically:

- The Detroit NDC's operating plan dated January 2012 did not list start and end times for sorting Priority Mail.
- The Michigan Metroplex P&DC's operating plan dated September 2016 had scheduled mail arriving at the facility past the critical start and end times.
- The Lansing P&DC's operating plan dated December 2003 did not reflect that mail cancellation is no longer performed at this facility.

Great Lakes Area management agreed that they should review and update operating plans annually. They said the next review would be in the spring of 2018, but have not set a specific date. Postal Service policy requires accurate

operating plans to assist management in the scheduling, processing, and delivery of mail.⁹ When operating plans are not accurate, there is an increased risk that mail will not be processed in time to meet the Postal Service's service performance goal.

Recommendation #4:

The Acting Vice President, Great Lakes Area, ensure all the Great Lakes Area mail processing facilities have accurate operating plans that reflect current mail processing operations.

“We found that the three facilities selected for visits did not have accurate operating plans that reflected current mail processing operations.”

Management's Comments

Management generally agreed with our findings and recommendations. Management partially agreed with recommendation 3, but said that it would not be physically possible to verify every single piece of UBBM that arrives at the Detroit NDC. Management agreed to develop standard work instructions to review all UBBM containers upon arrival at the Detroit NDC.

Regarding recommendation 1, management said they agreed with the recommendation and ensured compliance by issuing written instructions to the field on March 16, 2018 on proper MCRS reporting. Management also said additional training was conducted on May 3, 2018. The target implementation date is May 30, 2018.

Regarding recommendation 2, management said they agreed with the recommendation and ensured compliance by re-issuing UBBM guidelines for handling to the managers of Operations Program Support and Customer Service on April 23, 2018. The target implementation date is May 30, 2018.

⁹ Mail Processing Operating Plan System User Guide, May 19, 2009.

Regarding recommendation 3, management said they agreed in part with the recommendation. Management said they re-issued standard work instructions in April 2018 on the proper preparation and disposition of UBBM to the facilities that send UBBM mail to the Detroit NDC. Management also said Detroit NDC employees will review the visible contents of UBBM mail containers prior to placing UBBM volume in the compactor and collect any non-UBBM volume for proper processing and notify the originating office. The target implementation date is May 30, 2018.

Regarding recommendation 4, management said they agreed with the recommendation and will ensure compliance by creating a tracking sheet, conducting training as needed, and requiring all districts to submit updated operating plans. The target implementation date is August 30, 2018.

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 in the report and corrective actions should resolve the issues identified in the report.

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

Appendices

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Appendix A: Additional Information

Scope and Methodology

Our objective was to determine the accuracy of delayed mail reporting at three selected facilities in the Great Lakes Area.

To accomplish our objective, we:

- Conducted unannounced audit observations of daily mail counts at the Detroit NDC in Allen Park, MI, the Michigan Metroplex P&DC in Pontiac, MI, and the Lansing, MI, P&DC on March 6, 2018, to determine if facilities are accurately counting and reporting delayed mail for all classes of mail.
- Determined the amount of mail that was processed after clearance times and determined if it was reported on the MCRS report.
- Determined the amount of mail the facility received late to determine if it was reported on the MCRS report.
- Inspected all trailers in the yard and documented any delayed mail found with photographs, including Mail Transport Equipment Labeler (MTEL) placards and the dates of oldest mail.
- Interviewed local management to determine causes for any mail condition reporting discrepancies found.

- Interviewed local management to determine causes of delayed mail, including corrective actions the facilities have planned or have already taken to mitigate delayed mail.
- Obtained documentation of any communication the facilities have with the area regarding the cause of delayed mail.

We conducted this performance audit from February through May 2018, 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on April 24, 2018, and included their comments where appropriate.

We assessed the reliability of computer-processed data from Enterprise Data Warehouse, Mail History Tracking System, and Mail Condition Reporting System by testing the completeness, reasonableness, accuracy, and validity of these systems. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact (in millions)
<i>Delayed Mail Validation</i>	Determine the accuracy of delayed mail reporting by the Postal Service.	NO-AR-17-011	8/10/2017	None
<i>Timeliness of Mail Processing at the Santa Clarita, CA, Processing and Distribution Center</i>	Determine the cause of delayed mail at the Santa Clarita P&DC.	NO-AR-17-007	4/6/2017	\$1.1
<i>Timeliness of First-Class Mail Flats</i>	Assess the timeliness of First-Class Mail flats.	NO-AR-17-001	10/6/2016	None
<i>Timeliness of Mail Processing at the Queens, NY, Processing and Distribution Center</i>	Determine the cause of delayed mail at the Queens P&DC.	NO-AR-16-010	9/20/2016	\$2.1
<i>Chicago District Processing Facilities' Process for Mail Count and Color-Coding of Standard Mail</i>	Determine if Chicago District Processing Facilities' employees accurately counted mail and applied color code tags to Standard Mail in accordance with policies.	NO-AR-16-007	4/22/2016	None
<i>Management Alert - Timeliness of Mail Processing at the North Houston, TX, Processing and Distribution Center</i>	Determine if the North Houston P&DC was processing mail on time.	NO-MT-16-002	2/29/2016	None
<i>Management Alert - Timeliness of Mail Processing at the Denver Processing and Distribution Center</i>	Determine if the Denver P&DC was processing mail on time.	NO-MT-16-001	12/3/2015	None
<i>Management Alert - Substantial Increase in Delayed Mail</i>	Assess timeliness of mail processing after the January 5, 2015, service standard revisions.	NO-MA-15-004	8/13/2015	None
<i>Management Alert - Mail Processing at the Southern Maine Processing and Distribution Center</i>	Assess mail processing operational changes at the Southern Maine P&DC in response to January 5, 2015, service standard revisions.	NO-MA-15-003	5/11/2015	None

Appendix B: Management's Comments

ERICA A. BRIX
ACTING VICE PRESIDENT, OPERATIONS
GREAT LAKES AREA



May 7, 2018

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Draft Audit Report – Delayed Mail Reporting in the Great Lakes Area
(Report Number NO-AR-18-DRAFT)

Management agrees with the findings in recommendations one, two and four.
Management agrees partially with recommendation number three.

Recommendation number three states that an SOP should be developed to include verification that deliverable mail is not mixed in with Undeliverable Bulk Business Mail (UBBM) when it arrives at the Detroit Network Distribution Center (NDC). Management does agree with the development of standard work instructions to address the issue, however it will not be physically possible to verify every single piece of UBBM mail that arrives at the Detroit NDC. A structured process will be a component of the standard work instructions to review all UBBM containers upon arrival at the Detroit NDC. Single piece verification is required at delivery units and downstream facilities, and this has been reinforced with the reissuance of instructions to these source UBBM sites.

Recommendation #1:

The Acting Vice President, Great Lakes Area, should ensure staff responsible for daily Mail Condition Reporting System reporting are trained so they are aware of the requirement to include late arriving and plan failure mail.

Management Response/Action Plan:

Management agrees with this recommendation and ensures compliance by the issuance of correct reporting procedures to all Great Lakes Plant Managers to instruct employees on proper MCRS reporting. Written instructions were issued to the field on March 16, 2018 with WebEx training for additional training conducted on May 3, 2018.

500 FULLERTON AVENUE
CAROL STREAM IL 60199-1000
630-539-5556
FAX: 630-539-7171

- 2 -

Target Implementation Date:

May 30, 2018

Responsible Official:

Manager, In Plant Support – Great Lakes Area

Recommendation #2:

The Acting Vice President, Great Lakes Area, should ensure delivery unit staff in the Great Lakes Area are following the standard operating procedures for handling Undeliverable Bulk Business Mail.

Management Response/Action Plan:

Management agrees with this recommendation and ensures compliance by the re-issuance of UBBM guidelines for delivery found in the M41 and PO603. These instructions were reissued to the Managers, Operations Program Support and Managers, Customer Service on April 23, 2018.

Target Implementation Date:

May 30, 2018

Responsible Official:

Manager, Delivery Programs Support – Great Lakes Area

Recommendation #3

The Acting Vice President, Great Lakes Area, should ensure plant management at the Detroit Network Distribution Center develop a standard operating procedure to verify deliverable mail is not mixed in with Undeliverable Bulk Business mail when it is received at the facility.

Management Response/Action Plan:

Management agrees in part with this recommendation. UBBM volumes arrive at the Detroit NDC from the delivery units and downstream facilities. Standard work instructions on the proper preparation and disposition of this volume have been reissued to the sites in April of 2018. The Detroit NDC will take the UBBM containers upon arrival to the staging area next to dock #1 which is designated for "Paper Recycling". A review of the visible contents will be performed prior to

- 3 -

the UBBM volume placed in the compactor. Any non-UBBM volumes will be collected and immediately taken to a supervisor for proper processing. The originating office will be notified.

Target Implementation Date:
May 30, 2018

Responsible Official:
Plant Manager, Detroit Network Distribution Center

Recommendation #4:

The Vice President, Great Lakes Area, should ensure all the Great Lakes Area mail processing facilities have accurate operating plans that reflect current mail processing operations.

Management Response/Action Plan:

Management agrees with this recommendation and will ensure compliance by creating a tracking sheet, conduct training as needed, and require all district to submit updated operating plans by August 30, 2018. Operational changes also require operating plan updates and will be tracked for compliance by the Lead OIE at the Great Lakes Area office.

Target Implement Date:
August 30, 2018

Responsible Official:
Manager, In Plant Support – Great Lakes Area

Respectfully submitted,


for Erica A. Brix
Vice President, Area Operations (A)
Great Lakes Area

cc: Sally K. Haring, Manager via email (CARMManager@USPS.GOV)
E-FOIA@uspsog.gov



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