



Office of Inspector General | United States Postal Service

Audit Report

Service Performance of Election and Political Mail During the 2018 Midterm and Special Elections

Report Number 19XG010NO000-R20 | November 4, 2019



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Highlights

Objective

Our objective was to evaluate the U.S. Postal Service's performance in processing Election and Political Mail for the 2018 midterm and special elections. The Postmaster General requested this audit. We previously reviewed the Processing Readiness for Election and Political Mail for the 2018 Midterm Elections and issued a report in June 2018. Midterm and general elections are held in the U.S. every two and four years, respectively. Special elections are held outside of this cycle for specific purposes, often to fill a vacant office. The next general election will be held on Tuesday, November 3, 2020.

Election Mail is a mailpiece that an authorized election official creates for voters participating in the election process. Election Mail is generally First-Class Mail and its service standard ranges from 1-3 days. Service standards specify timeliness targets for delivering mail after receiving it from a customer. Management determines service standards based on the class of mail, where it originates, and where it is going, or destined. Generally, the farther the mail must travel, the more days for the service standard. The Postal Service measures its mail service performance against these service standards. The service performance goal for First-Class Mail is 96 percent.

Political Mail is any mailpiece mailed for political campaign purposes by a registered political candidate, a campaign committee, or a committee of a political party to promote political candidates, referendums, or political campaigns. Political Mail is Marketing Mail and its service standard ranges from 3-10 days within the Continental U.S. The target for Political Mail is 91.80; however, based on our work, we found that facilities typically process Political Mail as First-Class Mail.

After evaluating the Postal Service's performance for processing Election and Political Mail for the period January through October 2018, we conducted interviews with Postal Service plant officials at the highest and lowest performing

sites in each of the seven Postal Service areas based on service performance. In addition, we interviewed headquarters officials and area and district Political and Election Mail coordinators.

High-performing sites — the Seattle Priority Mail Annex, WA; and the Oklahoma City, OK; Knoxville, TN; Norfolk, VA; Southern ME; Bakersfield, CA; and Madison, WI, Processing & Distribution Centers (P&DC) were the seven highest performing locations for Election and Political Mail and averaged 99.6 percent on-time performance.

Low-performing sites — the Eau Claire, WI; Royal Palm, FL; Cleveland, OH; Suburban, MD; Dominick V. Daniels, NJ; Anaheim, CA; and Fox Valley, IL, P&DCs were the seven lowest performing locations for Election and Political Mail and averaged 84.2 percent on-time performance.

What the OIG Found

We found that the Postal Service's nationwide service performance score for Election and Political Mail was 95.6 percent, or slightly below its goal of 96 percent. However, we also determined that 70 percent of Postal Service facilities with Election and Political Mail volume greater than two million mailpieces met or exceeded the service performance goal and averaged 98.3 percent on-time performance.

Management at the seven high-performing sites attributed their success to the following critical factors:

- Three had timely and frequent communication with all levels of plant staff. For example, Political and Election Mail coordinators communicated with mail processing plant, post office, and area managers to discuss potential problem areas.
- Four had personnel separate and identify Election and Political Mail from other mail in the facility to improve processing in compliance with the Election and Political mail standard operating procedures.

Management at the seven low-performing sites attributed poor performance to the following factors:

- Six did not reassign mail processing staff to accommodate peak Election and Political Mail volume periods.
- Six encountered mailpiece design issues such as improper mailpiece size and barcodes.
- Four were unsure how to track Election and Political Mail service performance using the new Informed Visibility application.

Not meeting mail service performance goals increases the risk of customer dissatisfaction, which could lead to reduced business for the Postal Service and a

potential loss of revenue. In addition, timely delivery of Election and Political Mail is necessary to ensure the integrity of the U.S. election process.

What the OIG Recommended

We recommended management:

- Ensure sufficient mail processing staff are assigned to appropriately process peak Election and Political Mail volume.
- Ensure continued outreach to mailers and election officials on proper mailpiece design.
- Provide training and guidance to applicable staff on obtaining Election and Political Mail service performance in the Informed Visibility application.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

November 4, 2019

MEMORANDUM FOR: DR. JOSHUA D. COLIN
ACTING VICE PRESIDENT, PROCESSING
AND MAINTENANCE

E-Signed by Inspector General
VERIFY authenticity with eSign Desktop
Darrell E. Benjamin, Jr.

FROM: Darrell E. Benjamin, Jr.
Deputy Assistant Inspector General
for Mission Operations

SUBJECT: Audit Report – Service Performance of Election and Political
Mail During the 2018 Midterm and Special Elections
(Report Number 19XG010NO000-R20)

This report presents the results of our audit of the Service Performance of Election and Political Mail During 2018 Midterm and Special Elections (Project Number 19XG010NO000).

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
Vice President, Sales

Results

Introduction/Objective

This report responds to a request from the Postmaster General to review the Service Performance of Election and Political Mail During 2018 Midterm and Special Elections (Project Number 19XG010NO000). We previously reviewed the Processing Readiness for Election and Political Mail for the 2018 Midterm Elections and issued an audit report in June 2018.¹ The scope of this audit was January through October 2018 while the previous audit covered the period October 2016 through December 2017. The objective of our report was to evaluate the U.S. Postal Service's performance in processing Election and Political Mail for the 2018 midterm and special elections. See [Appendix A](#) for additional information about this audit.

Background

Midterm and general elections are held in the U.S. every two and four years, respectively. Special elections are held outside of this cycle for specific purposes, often to fill a vacant office. The next general election will be held on Tuesday, November 3, 2020.

Election Mail is a mailpiece that an authorized election official creates for voters participating in the election process. Election Mail is generally First-Class Mail and its service standard ranges from 1-3 days. Service standards specify timeliness targets for delivering mail after receiving it from a customer and are determined based on the class of mail, where it originates, and where it is going, or destined. Generally, the farther the mail must travel, the more days for the service standard. The Postal Service measures its mail service performance against these service standards.

Political Mail is any mailpiece mailed for political campaign purposes by a registered political candidate, a campaign committee, or a committee of a political party to promote a political candidate, referendum, or political campaign. Political mail is generally marketing mail and its service standard ranges from 3-10 days

within the Continental U.S. The target for Political Mail is 91.80; however, based on our work, we found that facilities typically process Political Mail as First-Class Mail. The service performance goal for First-Class Mail is 96 percent.

After evaluating the Postal Service's performance for processing Election and Political Mail for the midterm election period January through October 2018, we interviewed headquarters and area officials, as well as area and district political and election mail coordinators to determine challenges, causes for poor performance, lessons learned, and best practices. The Postal Service processed over 1.2 billion Election and Political mailpieces nationwide during this period.

“The Postal Service processed over 1.2 billion Election and Political mailpieces nationwide during this period.”

We also interviewed Postal Service plant officials at the highest and lowest performing sites in each of the seven Postal Service areas based on service performance to determine challenges, lessons learned, and best practices in processing Election and Political Mail for the 2018 midterm and special elections.

Finding #1: Election and Political Mail Service Performance

The Postal Service's nationwide service performance score for Election and Political Mail was 95.6 percent, or slightly below its goal of 96 percent.² However, we also determined that 70 percent of Postal Service facilities with Election and Political Mail volume greater than two million mailpieces met or exceeded the service performance goal and averaged 98.3 percent on-time performance.³

We interviewed Postal Service plant officials at the highest and lowest performing sites in each of the seven Postal Service areas based on service performance (see [Table 1](#) and [Table 2](#)).

¹ *Processing Readiness for Election and Political Mail for the 2018 Midterm Elections* (Report Number NO-AR-18-007, dated June 5, 2018).

² The United States Postal Service Office of Inspector General (OIG) was unable to separate Election and Political Mail data provided by the Postal Service; hence, we used the First-Class Mail goal of 96 percent based on how facilities typically process Election and Political Mail as First-Class Mail.

³ Service performance for the remaining 30 percent of the mail processing facilities is 91.6 percent.

Election and Political Mail Service Performance Scores



Table 1. Election and Political Mail Service Performance Scores for High-Performing Facilities

Site	Processing Score (percent)	First-Class Mail National Goal (percent)	Difference (percent)
Bakersfield P&DC	99.5	96.0	3.5
Knoxville P&DC	99.7	96.0	3.7
Madison P&DC	99.5	96.0	3.5
Norfolk P&DC	99.5	96.0	3.5
Oklahoma City P&DC	99.7	96.0	3.7
Seattle Priority Mail Annex	99.8	96.0	3.8
Southern ME P&DC	99.5	96.0	3.5
Average	99.6	96.0	3.6

Source: IV Election and Political Mail performance data for the period January through October 2018.

Table 2. Election and Political Mail Service Performance Scores for Low-Performing Facilities

Site	Processing Score (percent)	First-Class Mail National Goal (percent)	Difference (percent)
Anaheim P&DC	83.8	96.0	-12.2
Cleveland P&DC	79.4	96.0	-16.6
Dominic V. Daniels P&DC	90.9	96.0	-5.1
Eau Claire P&DC	86.6	96.0	-9.4
Fox Valley P&DC	88.8	96.0	-7.2
Royal Palm P&DC	75.7	96.0	-20.3
Suburban MD P&DC	84.2	96.0	-11.8
Average	84.2	96.0	-11.8

Source: IV Election and Political Mail performance data for the period January through October 2018.

Management at the seven high-performing sites attributed their success to the following critical factors:

- Three (the Knoxville and Oklahoma City P&DCs and the Seattle Annex) identified timely and frequent communication with all levels of plant staff as the key to success. For example, the Knoxville P&DC stated that Election and Political Mail coordinators⁴ communicated with mail processing plant, post office, and area managers to discuss potential problem areas. The Seattle Annex sent out emails to the facility staff to ensure they are aware of the current policies and procedures for Election and Political Mail.

“Three identified timely and frequent communication with all levels of plant staff as the key to success.”

- Four (the Norfolk, Southern ME, and Oklahoma P&DCs and the Seattle Annex) had personnel identify and separate Election and Political Mail from other mail at the facility to improve processing in accordance with standard operating procedures. For example, the Southern Maine P&DC placed a laminated placard on containers of Election and Political Mail while the Norfolk P&DC used bright red signage in its political mail staging area to identify Election and Political Mail.

Management at the seven low-performing sites attributed poor performance to the following factors:

- Six did not reassign mail processing staff during peak Election and Political Mail volume periods. In addition, managers at several P&DCs indicated that even after reallocating resources and using overtime hours, they were still unable to adequately handle the Election and Political Mail volume.

- Six encountered mailpiece design issues such as improper mailpiece size and illegible barcodes and addresses, which impacted the ability to process these mailpieces.
- Four were unsure how to track Election and Political Mail service performance using the new Informed Visibility (IV) application. Managers at these sites indicated that they did not understand what made up their service performance score or how IV service performance is calculated; therefore, they were unable to properly track and understand their performance during the Election and Political Mail processing season.

Not meeting mail service performance goals increases the risk of customer dissatisfaction, which could lead to reduced business for the Postal Service and a potential loss of revenue. In addition, timely delivery of Election and Political Mail is necessary to ensure the integrity of the election process.

Recommendation #1

The **Acting Vice President, Processing and Maintenance**, ensure sufficient mail processing staff are appropriately assigned to process peak Election and Political Mail volume.

Recommendation #2

The **Acting Vice President, Processing and Maintenance**, ensure continued outreach to mailers and election officials on proper mailpiece design.

Recommendation #3

The **Acting Vice President, Processing and Maintenance**, provide training and guidance to applicable staff on obtaining Election and Political Mail service performance in the Informed Visibility application.

⁴ There are seven area coordinators for each of the seven Postal Service areas and 67 district lead coordinators. District lead coordinators are responsible for ensuring that meetings occur with every Election Board official in their district and mitigating any potential issues.

Management's Comments

Management generally agreed with the findings and agreed with the recommendations but disagreed with the OIG comparing service performance of Election and Political Mail against the First-Class Mail goal of 96 percent. Management stated that comparing all Election and Political Mail against the First-Class Mail goal of 96 percent doesn't take into account the large portion of Election and Political Mail that is sent as Marketing Mail and has a different service performance goal. Management added that mail is processed in accordance with the level of service for which postage has been paid. Management stated that since most Election and Political Mail is mailed and processed as Marketing Mail, the First-Class Mail goal should not be used to measure performance.

Regarding recommendation 1, management stated that the Postal Service has established processes to align workforce to workload. Management stated that they have put additional resources in place in locations with increased Election and Political Mail volume and they will continue to adjust staffing levels as needed.

Regarding recommendation 2, management stated that Election and Political Mail coordinators are required to contact mailers and election officials prior to an election and provide information on mailpiece design. On October 2, 2019, Postal Service management advised Election and Political Mail coordinators to continue ongoing outreach efforts with mailers and election officials. In addition, a mailpiece design analyst participated in the meeting and provided the coordinators with additional information on the design process and contact information to share with mailers and election officials. Management implemented this recommendation on October 2, 2019.

Regarding recommendation 3, management stated that they provided a demonstration on how to use IV to view Election and Political Mail processing scores to the Election and Political Mail coordinators on October 2, 2019.

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.

Regarding the measurement of Election and Political Mail against the First-Class Mail goal of 96 percent, the Election and Political Mail data the Postal Service provided did not separate service performance scores by class of mail. Further, per our discussions with management at seven facilities and in one Postal Service area, they stated that they treat Election and Political Mail as First-Class Mail. Since the remaining seven facility managers did not object to us comparing Election and Political Mail against the First-Class Mail goal, we concluded that this was how this mail was generally handled. Accordingly, we compared Election and Political Mail against the First-Class Mail goal.

Regarding recommendation 1, the Postal Service did not provide support for its stated actions and did not provide an implementation date; therefore, we will keep this recommendation open until adequate support is provided to close it.

All recommendations require OIG concurrence before closure. The OIG requests written confirmation when corrective actions are completed. Recommendation 1 should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed. Based on the documentation provided by Postal Service management, we consider recommendations 2 and 3 closed with the issuance of this report.

Appendices

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Appendix A: Additional Information

Scope and Methodology

The scope of our audit was Election and Political Mail processing for the 2018 midterm and special elections. To accomplish our objective, we:

- Evaluated and analyzed Postal Service data on Election and Political Mail service performance from January through October 2018.
- Identified the highest and lowest performing facilities in each of the seven Postal Service areas based on their Election and Political Mail service performance scores as shown in Table 3. We selected these facilities for site visits to identify best practices and opportunities for improvement.
- Interviewed Postal Service Headquarters, area officials, and members of the Political Mail Strike Team,⁵ Political Mail Steering Committee,⁶ and the Democracy Works Association;⁷ and identified challenges, lessons learned, and best practices in the processing of Election and Political Mail.
- Requested and evaluated documentation from Postal Service area and district officials regarding action taken in preparation of the 2018 midterm and special elections to include communication amongst facility staff (e.g., facility managers and employees, area/district coordinators, etc.).

Table 3. Facilities Selected for Review

Postal Service Area	Mail Processing Facility
Cap Metro	Norfolk, VA (Top) Suburban MD (Bottom)
Eastern	Knoxville, TN (Top) Cleveland, OH (Bottom)
Great Lakes	Madison, WI (Top) Fox Valley, IL (Bottom)
Northeast	Southern ME (Top) Dominick V. Daniels, NJ (Bottom)
Pacific	Bakersfield, CA (Top) Anaheim, CA (Bottom)
Southern	Oklahoma City, OK (Top) Royal Palm, FL (Bottom)
Western	Seattle Annex, WA (Top) Eau Claire, WI (Bottom)

Source: IV system and OIG analysis.

We conducted this performance audit from April through November 2019 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 finding and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective. We discussed our observations and conclusions with management on September 25, 2019, and included their comments where appropriate.

We assessed the reliability of computer-generated data from IV application by interviewing agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

⁵ Works closely with Postal Service operations and major mailers and communicates and shares information with customers at the federal, state, and local levels.

⁶ A cross-functional team that began in 2012 to address concerns from members of Congress, state election officials, mailers, and customers about network rationalization and its perceived impact on Election and Political Mail.

⁷ A voter-oriented nonpartisan 501(c)(3) organization dedicated to the idea that voting should fit the way we live. They are a team of software developers, public policy wonks, and civic organizers building the tools that improve the voting experience for voters and election officials.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Processing Readiness for Election and Political Mail for the 2018 Midterm Elections</i>	Evaluate the Postal Service's readiness for timely processing of Election and Political Mail for the 2018 Midterm Elections.	NO-AR-18-007	6/5/2018	None

Appendix B: Management's Comments

JOSHUA D. COLIN PhD.
VICE PRESIDENT
PROCESSING AND MAINTENANCE OPERATIONS/A



October 28, 2019

TO: Lazerick C. Poland
Director, Audit Operations

SUBJECT: Service Performance of Election and Political Mail During the 2018
Midterm and Special Elections
(Report Number: NO-AR-19-DRAFT)

Thank you for the opportunity to review and comment on the Office of Inspector General (OIG) *Service Performance of Election and Political Mail During the 2018 Midterm and Special Elections* audit. This audit found that timely delivery of Election and Political Mail is necessary to ensure the integrity of the U.S. election process. The OIG found that, while the Postal Service's nationwide service performance score for Election and Political Mail (at 95.6 percent) was slightly below the First-Class Mail goal of 96 percent, 70 percent of Postal Service facilities with Election and Political Mail volume greater than two million mailpieces met or exceeded the service performance goal and had an average on-time performance of 98.3 percent. Meeting service performance goals is important to avoiding the risk of customer dissatisfaction and revenue loss.

The Postal Service largely agrees with OIG's findings, but does not agree with the implication that the service performance for all Election and Political Mail volume should be measured against the First-Class Mail goal of 96 percent. In selecting the First-Class Mail goal as the appropriate standard, OIG did not take into account that a large portion of Election and Political Mail is sent as Marketing Mail, which has a different service performance goal than First-Class Mail. For Election Mail, the Postal Service encourages election officials to use First-Class Mail and create automation-compatible mailpieces, but election officials may send certain materials at the Non-Profit Marketing Mail rate as permitted by law. In order to provide greater visibility to Election Mail as it is being processed, the Postal Service encourages election officials to use Tag 191, Domestic and International Mail Ballots, but this is not a guarantee of First-Class Mail service. Political Mail is also usually sent as Marketing Mail, and the Postal Service encourages mailers to use Tag 57, Political Campaign Mailing to provide greater visibility to the mailing, but this is not a guarantee of First-Class Mail service. The mail is processed in accordance with the level of

475 L'ENFANT PLAZA SW RM 7015
WASHINGTON, DC 20260-7607
202 268-3096

service for which postage has been paid. Because most Election and Political Mail is mailed and processed as Marketing Mail, the First-Class Mail goal should not be used for measuring that volume's performance.

The Postal Service agrees with the OIG's recommendations. As part of our commitment to the Nation's election process, the Postal Service has already established a comprehensive Election and Political Mail outreach program. The Postal Service has an Election and Political Mail Steering Committee that meets on a regular basis to coordinate outreach strategies, best practices, and other educational efforts for election officials, political candidates, and mailers, and addresses issues with Election and Political Mail should they arise. Postal Service officials regularly meet with election community leaders and organizations. The Postal Service also has Election and Political Mail Coordinators in each Area and District who conduct ongoing outreach with local election officials and mailers to discuss upcoming elections, mailpiece design, and other customer concerns. Additionally, the Postal Service hosts webinars on Election and Political Mail, and provides employee service talks on standard operating procedures for processing Election and Political Mail and common processing concerns. As specifically related to OIG's recommendations, the Postal Service already has processes in place to ensure proper staffing based on volume and other factors. We have reviewed the Election and Political Mail Coordinators' duties, and provided them with additional resources regarding mailpiece design services. We have also held a training on how to use Informed Visibility (IV) as a tool to generate reports on Political Mail service performance scores, which are different from service performance goals.

Recommendation [1]:

The Acting Vice President, Processing and Maintenance, ensure sufficient mail processing staff are appropriately assigned to process peak Election and Political Mail volume.

Management Response/Action Plan:

The Postal Service agrees with the intent of this recommendation. The Postal Service has established processes to align workforce to workload. Consistent with this process, in locations with increased volume, including Election and Political Mail, resources are allocated to keep the network fluid. The Postal Service will continue to adjust staffing levels as needed.

Target Implementation Date:

Completed.

Responsible Official:
N/A

Recommendation [2]:

The Acting Vice President, Processing and Maintenance, ensure continued outreach to mailers and election officials on proper mailpiece design.

Management Response/Action Plan:

The Postal Service agrees with this recommendation. As explained above, the Postal Service has a robust Election and Political Mail outreach program. Election and Political Mail Coordinators are required to contact mailers and election officials prior to an election and are able to provide information on mailpiece design. On October 2, 2019, during a regularly scheduled internal biweekly Political and Election Mail teleconference, Management advised Election and Political Mail Coordinators to continue ongoing outreach efforts with mailers and election officials. A Mailpiece Design Analyst participated in the call and provided the Coordinators with additional information on the mailpiece design process and contact information to share with mailers and election officials.

Target Implementation Date:
Completed October 2, 2019.

Responsible Official:
N/A

Recommendation [3]:

The Acting Vice President, Processing and Maintenance, provide training and guidance to applicable staff on obtaining Election and Political Mail service performance in the IV application.

Management Response/Action Plan:

The Postal Service agrees with this recommendation. Service performance scores are not the same as service performance goals. The Postal Service does not have a separate service performance *goal* for Election and Political Mail. Service performance *scores* are calculated at the mail class level.

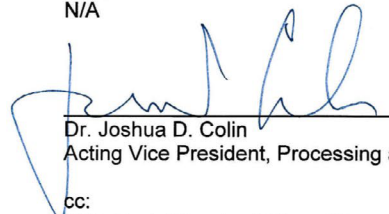
IV is a program designed to provide increased visibility of the mail and provide reporting data within the mailstream. IV can be used as a tool to track service performance scores, including processing scores, for mail that meets the Postal Service's Intelligent Mail Barcode full-service requirements, including using electronic documentation and unique barcodes. While IV calculates service performance scores at the mail class level, it can also be used to isolate the scores for certain volume, including Political Mail, provided unique barcode data and electronic documentation is available.

- 4 -

Management provided a live demonstration to the Election and Political Mail Coordinators on how to use IV to view their Political Mail processing scores during the biweekly teleconference on October 2, 2019.

Target Implementation Date:
Completed October 2, 2019.

Responsible Official:
N/A

A handwritten signature in blue ink, appearing to read "Joshua D. Colin", is written over a horizontal line.

Dr. Joshua D. Colin
Acting Vice President, Processing and Maintenance

cc:
U.S. Postal Service Office of Inspector General's Audit Tracking Mailbox
[REDACTED] *Manager, Corporate Audit Response*



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1735 North Lynn Street
Arlington, VA 22209-2020
(703) 248-2100

For media inquiries, contact Agapi Doulaveris
Telephone: 703-248-2286
adoulaveris@uspsoig.gov